

June 25, 2021

Dear President Hucker and Members of the County Council,

On behalf of the _____ undersigned incorporated municipalities and community organizations across Montgomery County that represent over _____ voters, we are writing to express the seven critical concerns we have about *Thrive Montgomery 2050* (the 'Draft Plan'). We believe that the goals of the Draft Plan – which we support - will have a better chance of being attained, if the County Council makes the following modifications:

- Mandate the use of the traditional master & sector planning processes to specify zoning changes to achieve public buy-in and to avoid a one-size-fits-all approach now prescribed in the Draft Plan.
- Reinstate the concept and value of compatibility as a means of ensuring that such change enhances each individual community for all residents -- new and existing.
- Include detailed strategies for how affordable and attainable housing can be created through adaptive reuse and other means.
- Reinstate a chapter on economic competitiveness that was deleted from the initial draft, in recognition that a holistic vision will be needed to reverse current shortcomings in jobs and wages.
- Include more robust funding methods for needed infrastructure.
- Discuss how the evolution from a car-centric to transit-centric society will be staged and differentiated across the diverse communities of the county.
- Require a 5-year review to document results and impacts as well as modify the Draft Plan as indicated by the results of the review.

We support many of the principles of the Draft Plan, including economic competitiveness and equity, affordable and attainable housing, inclusive and socially connected communities, environmental sustainability and resiliency, and walkable communities. However, before the County Council approves the Draft Plan that will form the basis for long-term large-scale community development and redevelopment, we strongly recommend that careful attention be paid, and revisions be made, based on the suggestions and concerns in this letter, which reflect considerable community input and discussion.

1. The Draft Plan should mandate the use of the traditional master & sector planning processes to specify zoning changes to achieve public buy-in and to avoid a one-size-fits-all approach now prescribed. There is keen interest by some stakeholders for the county to move rapidly to permit higher density near transit. However, our communities do not support the integration of larger than house-scale structures into neighborhoods without retaining naturally occurring affordable housing, examining the impacts on infrastructure capacity and existing area small businesses, and considering the concerns and preferences of residents who want a say in how their neighborhoods evolve and how people will live their lives.

The county has traditionally used the master & sector planning processes to focus on the objectives and needs for a specific area and to allow for more resident input and buy-in. The county ranges from rural areas to urban centers and any one-size-fits-all approach (i.e., as specified by a Zoning Text Amendment) by definition fails to adequately take into consideration local conditions. Using the master & sector planning processes can help ensure that essential and accurate analyses of attainable and affordable housing prospects, concentrated infrastructure capacity studies and investments, improved stormwater regulations to handle increased residential density, targeted economic development strategies, and tax changes are comprehensive, adequate, and communicated.

2. **The Draft Plan should reinstate the concept and value of compatibility as a means of ensuring that such change enhances each individual community for all residents -- new and existing.** The concept of compatibility has been a key component of the county’s zoning policy for decades, was a key concept in the October 1 Planning Board draft of the Draft Plan and has always been a core concept in “Missing Middle Housing”. Compatibility with a neighborhood’s physical characteristics including development and environmental is very important to residents and assurances that it continues to be a key concept in the Draft Plan and in the zoning code are vital.

Yet, the current version of the Draft Plan states that this key concept is “vague” and calls for its removal. If compatibility is too vaguely defined in the zoning code, the solution is to improve its definition, not to remove the concept. The Draft Plan calls for replacing compatibility with “clear standards for form, site layout, setbacks, architecture, and the location of parking”. We endorse clear standards but point out that the purpose of such standards is to ensure compatibility. Ensuring that all new residential buildings in established neighborhoods are compatible with existing houses (meaning that they conform to county or municipal standards for lot coverage, setbacks, height, massing, green space, tree canopy, and parking) makes it much more likely that new residential housing types blend harmoniously with the neighborhood. Continued assurances of compatibility for single-family properties confronting, abutting, or adjacent to CR-zoned properties will also be important if the County Council agrees to the concept of developing “complete communities” along our transit corridors. Compatibility also is an important concept as we consider which uses to allow unconditionally, and which to classify as limited or conditional uses.

Our coalition represents residents in communities throughout the county. Based on extensive outreach efforts we have found that some residents strongly oppose the proposed changes, but many are open to or supportive of some or many of them. However, all agree that such changes must be made in a way that is open and inclusive of their concerns. These include concerns about homes being dwarfed by larger buildings, stormwater management issues, emergency vehicle access problems, and rapid and potentially dramatic changes to the physical characteristics of their neighborhoods that they value. Ensuring compatibility will foster community engagement and relationships and could increase residents’ acceptance of new housing types in their neighborhood.

3. **The Draft Plan should include detailed strategies for how affordable and attainable housing can be created through adaptive reuse and other means.** Other than building multi-family housing in single-family communities, the Draft Plan does not contain any strategies for addressing the need for HUD-defined affordable housing nor does it even contain a definition of attainable housing. According to the National Low Income Housing Coalition, for Maryland residents to afford a two-bedroom rental home without paying more than 30% of their income, they must earn \$27.52 per hour (or \$58,366 per annum). This disconnect should be addressed because according to the Draft Plan, a large proportion of county residents will be earning less than \$50,000 per annum by 2040.

Residents are concerned that construction of more housing types in single-family neighborhoods will not actually achieve the Draft Plan’s stated goals of affordable or even “attainable housing”. We are concerned that in areas with lower land values, the Draft Plan does not recognize the importance of older housing stock as a means of providing affordable or attainable housing. The Draft Plan should be more explicit as to how such housing can be maintained and/or subsidized rather than torn down for new housing, which will still be expensive in most, if not all, areas. Finally, the County Council should consider including a broader range of specific strategies in the Draft Plan that includes subsidies and subsidized construction, rent vouchers, adaptive reuse of retail buildings, and the identification of appropriate parcels to meet the need for affordable housing.

- 4. The Draft Plan should reinstate a chapter on economic competitiveness that was deleted from the initial draft, in recognition that a holistic vision will be needed to reverse current shortcomings in jobs and wages.** The Draft Plan includes as one of its three underlying objectives the need for improved economic competitiveness. It sets out a compelling case that the county is falling behind its neighbors and peer counties in attracting new jobs, growing wages, and attracting younger residents. Therefore, we urge the County Council to include holistic strategies aimed at building on existing economic strengths (e.g., biotech, federal government, and hospitality) and create an environment for innovation and entrepreneurship. Otherwise, this is an incomplete vision. The county has vast skills and resources but has failed to effectively build on these in growing the economy. We can and need to do better.

The Draft Plan is also based on the concept that “complete communities” will drive job and wage growth. However, exactly the opposite is true. We ask that the County Council invite the Montgomery County Economic Development Corporation to submit comments on the Plan as there needs to be a real discussion of the interrelationship between housing needs and economic development. For example, as the December 2020 Planning Department Report on White Flint determined, unless there are jobs in the area, developers will not build housing there. Only with wage and job growth will the county be able to achieve and pay for “complete communities”. We urge the County Council to have extensive hearings specifically on how to incorporate policies aimed at directly spurring wage and job growth into the Draft Plan.

- 5. The Draft Plan should include more robust funding methods for needed infrastructure.** Because of the lack of clarity regarding what constitutes a “complete community” in rural, suburban, and urban areas, and what elements – schools, government offices, medical facilities, jobs – are necessary to create a “complete community”, it is imperative that some mechanism be included to determine priorities for funding. There is a glaring omission of funding strategies for increasing public revenue to fund the decentralized public facilities, schools, and public transit infrastructure projects that will be needed for “complete communities”. The Draft Plan should identify more robust funding methods for the added pedestrian, bicycle, light rail, bus rapid transit, stormwater, and school infrastructure projects along with other public facilities needed so that the county can provide assurance to residents that incremental infrastructure demands for the many proposed complete communities throughout the county will be appropriately funded. Further, it is equally unclear how the burden of these infrastructure costs will be shared between developers, commercial interests, and residents. Finally, testimony must be obtained from the County Executive and County Departments and Agencies regarding the likely costs for various actions and timelines.
- 6. The Draft Plan should discuss how evolution from car-centric to transit-centric society will be staged and differentiated across the diverse communities of the county.** The Draft Plan does not adequately consider the interim stages between the county’s current transportation situation and the future vision of predominant public transit use. One example of an interim stage, and as reported by the Washington Post, is that “going forward, the expectation is that folks are going to be working perhaps one or two days in the office and the rest from home,” This concept initially translates to many workers who will prefer to live in suburbs rather than urban centers, opt to drive their electric car or use a ride sharing platform rather than public transit to commute to the office, and need more space for a home office.

According to the Washington Post, “Metro’s own projections show rail ridership recovery will take years. The transit agency has based next year’s operating budget on rail ridership growing only to about 35 percent of pre-pandemic levels by June 2022.” With unclear funding schemes and timelines for both BRT and Purple Line, the Draft Plan needs to provide county residents with clarity on how a

sufficient and efficient transit network will be created to get most county residents out of cars and, hence, substantially reduce traffic and vehicle miles traveled.

The desired evolution to a transit-centric society and its associated timing for items such as sidewalk and bicycle route installations or improvements as well as ADUs and infill development's demand for on-street parking are of particular interest given the large investment of public funds that would be needed and the uncertainties in obtaining funding. Also, while the Draft Plan focuses on equity, it does not consider the many senior citizens, physically, intellectually or emotionally challenged residents, or young families who will choose not to take public transit, bike or walk, particularly in inclement weather, to meet their day-to-day needs.

- 7. The Draft Plan should require a 5-year review to document results and impacts as well as modify the Draft Plan as indicated by the results of the review.** The Draft Plan outlines a marked transition for the county as it looks ahead thirty years, setting forth goals that will affect. However, there is a dearth of best practices, near and long-term action items, and accountability steps along the way needed to support them. First, we recommend that the County Council spearhead the development of one or two "complete community" pilot projects so that the concept is proven to work in the county. Second, we recommend that the County Council require that the county prepare a follow-up report in 2026 to measure and document the changes in multi-family versus single-family housing demand and supply, economic growth, development and competitiveness, public revenue, transit and ride sharing use, vehicle miles traveled, affordability metrics, adequate public facility impacts, and environmental factors such as stormwater management efficacy, and finally, recommendations for adjustments to the Draft Plan in order to achieve county goals.

We thank you for the opportunity to express our views and concerns and hope that the County Council will make the fiscally, environmentally, and socially responsible decision to incorporate these changes in the Draft Plan.

Sincerely,