

PHED Committee #3
July 26, 2021

MEMORANDUM

July 23, 2021

TO: Planning, Housing, and Economic Development (PHED) Committee

FROM: Pamela Dunn, Senior Legislative Analyst
Linda McMillan, Senior Legislative Analyst
Glenn Orlin, Senior Analyst
Elizabeth Olsson, Racial Equity and Social Justice Manager
Gene Smith, Legislative Analyst
Keith Levchenko, Senior Legislative Analyst

SUBJECT: Thrive Montgomery 2050

PURPOSE: Worksession to review the Planning Board Draft Thrive Montgomery 2050 Plan

Councilmembers may wish to bring their copy of the Plan to the meeting.
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This is the Planning, Housing, and Economic Development (PHED) Committee's third worksession on the Planning Board's Thrive Montgomery 2050 draft plan. The first worksession provided contextual information on general plans; what they are, what they contain, and how they differ from area master plans and functional plans. At the second worksession, the Planning Department provided a briefing to the Committee, presenting more detail on the creation of the Plan and a more thorough explanation of the Plan's vision. This worksession will focus on the introductory chapter of Thrive Montgomery 2050, the first chapter in the Plan.

Observations or issues for Committee discussion are presented below, generally following the organization of the Introduction. Following each item, one or more questions are posed for the Committee to consider. Answers to these questions will provide direction to Council staff on possible edits to the draft. Council staff and Planning staff will work together to draft any proposed revisions to the Introduction and include these draft changes in the staff report for the first worksession in September.

The first worksession in September, scheduled for September 20, will cover the chapters on Compact Growth and Complete Communities¹. On September 27 the Committee worksession will cover the chapters on Design, Arts and Culture, and Transportation and Communication Networks. The chapters on Affordable and Attainable Housing, and Parks and Recreation will be the topic of the October 4 worksession. And, on October 11 the Committee will hold a final worksession on the Conclusion and any other remaining or follow up issues².

One last note, in an effort to provide an efficient review of the Plan, Council staff has focused on observations and issues that warrant discussion or acknowledgement by the Committee. This should not be viewed as a comprehensive reflection of all that is in the Plan; there are many commendable elements not noted here.

Introduction to the General Plan

1. Opening Paragraphs

The opening page of the Plan starts with a recognition of the value of the Wedges and Corridor Plan to the County, noting that “Montgomery County prospered under the Wedges and Corridor Plan”. The sentiment is continued on the following page where the Plan mentions “we need to rethink approaches that served us well in the past”. These statements, while well-meaning and accurate for some in the County or when looking at countywide statistics such as median household incomes, do not acknowledge that these approaches have not served everyone well, particularly communities of color. A point noted later in the same paragraph. **These statements should be revised.**

A couple of paragraphs later, the Plan states that the implementation of the Wedges and Corridor Plan had “some unintended consequences such as inequitable investment between the eastern and western parts of the County, excessive reliance on automobiles, and zoning of more than one-third of the county exclusively for single family homes.” It is debatable whether the implementation of Wedges and Corridors resulted in an excessive reliance on automobiles (particularly since auto use in urban and corridor centers fell significantly during this time³), however, if it did, that would certainly seem unintended. What was not unintended was the disparate designations of the western and eastern portions of the County with respect to growth and investment, exacerbating racial and socioeconomic inequity. As for the amount of land zoned exclusively for single family homes, it is more accurate to refer to this as a purposeful part

¹ And a revised draft of the Introduction, draft based on Committee recommendations, will be included in the staff report for the Committee to review.

² A revised draft based on Committee recommendations will be included in the staff report for the Committee to review.

³

Non-Auto-Driver Mode Share in TMDs		
TMD	Initial (Year)	2018
Bethesda	27% (1994)	37%
North Bethesda	15% (1992)	29%
Friendship Heights	34% (1998)	44%
Life Science Center	16% (2010)	18%
Silver Spring	39% (1997)	55%

of the adoption of 1993 plan – not an unintended consequence. This section should be revised to reflect not the unintended consequences of the Wedges and Corridor framework but the expected result of identifying a suburban and residential wedge as well as only one corridor located in the western portion of the County, and the challenges that result.

2. What is a General Plan? What is Thrive Montgomery 2050?

On page 4, the Plan provides a sentence stating what a general plan is and the rest of the page explaining what Thrive Montgomery 2050 is⁴. The current general plan, the 1993 General Plan Refinement, spends more than four pages defining a general plan, explaining what the 1993 General Plan Refinement is, how it is implemented, and its relationship to master, sector and functional plans. Similarly, the Public Hearing Draft has a concise explanation of what Thrive Montgomery 2050 is and what it is not. On page 9 it states:

“Unlike an area master plan or a county-wide functional plan, Thrive Montgomery 2050:

- does not address short-term issues through specific land use guidance in targeted geographic areas;
- does not change zoning;
- does address multiple topic areas; and
- does frame issues for further study and action for implementation.”

It also includes a reference to earlier General Plans for context, displaying the land use map of prior plans (as does the 1993 Refinement). **Is there value to future readers in providing a more thorough explanation of the general plan, and its context in land use planning in the County, and should these references be retained for historical context and clarity?**

It has been almost 30 years since last Comprehensive Plan update, and approximately 30 years lapsed from the 1969 General Plan Update to the 1993 Refinement. As we recognize the acceleration of changes in our world – including rapid technological changes (that impact where we live and work, and how we work and travel), growing climate impacts, and unexpected yet presumably significant changes as a result of the COVID-19 pandemic, is 30-years the right timeframe? The average time horizon of the plans included in last week’s staff report (plus that of the Frederick and Prince George’s Counties) is 15-20 years. **Should the Plan set an expectation of review to a shorter timeframe?**

Note: This question was posed at the conclusion the second worksession. And in response, a concern was raised regarding the relevance of the general plan timeframe to master and sector plans, which are modeled on a 20-year time horizon. It’s a great point. It seems incongruous to imagine the general plan with a time horizon shorter than that of a master or sector plan, especially one being written around the same time. However, it may not be necessary for the general plan to have a *longer* time frame – since, as master and sector plans are written and revised on an ongoing basis, there will always be some whose time horizon overlaps two different general plans. The question is whether one believes the policies adopted thru this general plan should have a longevity of 30-years.

⁴ In its Conclusion, Thrive references the role of future master, sector, and functional plans.

3. Overarching Objectives of Thrive Montgomery 2050

According to the Plan, Thrive Montgomery 2050 is about embracing new realities, addressing historic inequities, and shifting the way we think about how the County should grow. It professes to outline strategies that will accommodate growth in ways that not only make room for new residents but also improve the quality of life for the people who are already here. These are commendable and impressive goals. To this end, the recommendations in the plan are organized to achieve three overarching objectives: **economic competitiveness, racial and social equity, and environmental sustainability.**

For context, the goals and objectives of the current general plan are shaped by ten themes “that constitute the philosophical underpinnings of the Plan”. Designated as guiding principles, they are:

- Implement land use patterns that conform to the Wedges and Corridor concept.
- Develop master and sector plans that are consistent with the General Plan.
- Support of physically concentrated centers designed to control sprawl, reduce energy use, provide needed infrastructure needs, and reduce development pressure on rural open space areas and farmland.
- Encourage public and private development whose architecture and design address the need for community identity by incorporating individuality, civic features, and the opportunity for social interaction.
- Encourage land use patterns that can be served effectively by a multi-modal transportation system, with an emphasis on providing opportunities for alternatives to single-occupant auto travel, and the needs of pedestrians.
- Encourage new development that will harmonize with the existing built environment and the natural environment, recognizing that it may be a matter of scale and intensity or a question of location, function, or style.
- Support the concepts of variety and choice to promote a strong and diverse economy, to meet current and future housing and employment needs, and to encourage effective and efficient transportation options.
- Strive for the most efficient and socially beneficial management of all County resources.
- Promote stewardship of the natural environment.
- Recognize the importance of public investment needed to implement the Plan.

It is interesting to note that of the ten themes, only one specifically mentions the economy; however, several could be pointed to as supporting the potential for greater economic activity in the County. Several of the themes support environmental sustainability and stewardship; however, none mention racial equity or social justice, or investing in communities of color, or promoting racial and economic integration. It is also worth noting that most of these themes appear in the Thrive Plan, not as prominent as a guiding principle or an overarching objective, but many are contained in or influence the policy recommendations in the Plan.

There is no question that economic competitiveness, racial equity and social justice, and environmental sustainability are critical issues facing the County today and will continue to be for years to come thus justifying their choice as the three overarching objectives to which “the

ideas and recommendations in the Plan are organized to achieve.” **Are there additional objectives that should be considered to the same degree?**

Given the importance and prominence of these objectives, the Public Hearing Draft included a brief vision for each one (page 36). These statements were not retained in the Planning Board Draft⁵. **The Committee may want to know the motivation for their removal?**

a. Economic Performance and Competitiveness

This section of the draft Plan provides economic data points to highlight certain economic conditions. The draft Plan posits that the County’s economic performance has been “sliding” since the 2008 recession. It warns that weak household income and job growth shrinks the County’s tax base, constraining its capacity to provide high-quality amenities and services, and limiting the ability of many County residents to buy a home. While the draft Plan argues that the economy is sliding, it also reinforces the general land use policies that are already in effect in the County – focus on corridors, compact, transit-oriented development, etc. The draft plan is silent on how these land use decisions differ from the past decisions, or how it will enable the County to attract more businesses to address the core economic issues presented. Also, many of the economic data points included in the draft Plan will require policy intervention beyond land use decisions (e.g., business formation). **Should the Plan more clearly indicate the connection between the land use policies in this plan and the economic factors impacted by such policies?**

For example, the Public Hearing Draft included a goal to “Preserve land for Production, Distribution, and Repair (PDR) activities that provide well-paying jobs to those without advanced degrees, provide essential goods and services, and propel economic competitiveness.” Without comment about this recommended goal, it is an example of a clear linkage between land use and economic policy.

There are many other reasons to suggest economic competitiveness should be an overarching objective, such as the benefit of employment opportunities near where people live, economic activity that helps create community identity, and the importance of job diversity. **Should this section, which is intended to establish why economic competitiveness should be an overarching objective, be revised to highlight other important benefits of economic health?**

The last paragraph of this section lists several actions needed to fortify the County’s economic performance, including bolster dominance in existing sectors, diversify the job base, improve connections to centers throughout the region, and provide the infrastructure, services and amenities that will strengthen the County’s ability to compete effectively in the future. **Should there be some indication of which policy recommendations in the draft support these actions, or should there be a specific chapter that clearly lays out these policies? If this plan should remain silent on certain economic policies, should it refer to another document or strategy, like the**

⁵ Neither was a multi-paragraph vision section included for each specific chapter as the chapters on economic competitiveness, Resilient Economy, and environmental sustainability, Healthy and Sustainable Environment, were not retained.

County's Economic Strategic Plan, that details the County's policies to bolster the economy?

b. Racial Equity and Social Inclusion

In order to adequately address racial inequities, policies must be developed within a context that accurately acknowledges how previous policies and practices have harmed communities of color and perpetuate racial disparities. The Racial Equity and Social Inclusion section of the Plan contains some but not all the text that was included in the Public Hearing Draft chapter titled *Planning for an Equitable and Just Future*. The Public Hearing Draft chapter provides a fuller description of the historical context of racially discriminatory land-use policies, and how this has resulted in racial and economic segregation, as well as a lack of public investment in Black communities and other communities of color in the County. It goes into greater detail and uses more race-explicit language that acknowledges the historical and present-day harms to Black communities and other communities of color. It also acknowledges that this history and continued disinvestment of communities of color has led to the current situation in which jobs, transit, and other amenities are concentrated in predominately white communities on the West side of the county to the detriment of communities of color on the east side. In addition, maps and figures illustrating these issues were reduced in size in the Planning Board Draft, making them illegible. **Should the more detailed and race-explicit text and larger graphics included in the Public Hearing Draft be reinstituted?**

The third paragraph in this section states that advancing racial equity through just planning policies and public investment, promoting the racial and economic integration of neighborhoods, and focusing on the potential for the design of communities to help build social trust and inclusion while encouraging civic participation are among the most significant elements of Thrive. **How do these significant elements relate to policies in the plan? Should there be some mention of the policies in the Plan that support or promote these elements⁶, or should there be a specific chapter that clearly lays out these policies?**

While this section appropriately focuses on racial disparities and harm to communities of color, social inclusion or social justice also includes attention to conditions impacting other marginalized communities, such as people with physical and/or developmental disabilities. The Draft Plan says, "decisions about land use, transportation, and public infrastructure can play an important role in building a sense of community." It ends this section by saying, "...focusing on the potential for design of community to help build social trust and inclusion while encouraging civic participation are among the most significant elements of Thrive Montgomery 2050." **Should this section address social inclusion more broadly, while still centering on racial equity?**

c. Environmental Resilience

Like the observations on Racial Equity and Social Inclusion above, the Public Hearing Draft included a chapter titled *Healthy and Sustainable Environment*. The chapter provides a more thorough presentation of the issues, challenges, polices and actions

⁶ As was provided in the Public Hearing Draft

related to sustainability. Both the Public Hearing Draft and the Planning Board Draft make the case that urbanism is the key to sustainability, and both point to past efforts to focus growth in targeted areas and preserving areas outside the targeted growth areas (such as the Ag Reserve and parks), as well as noting that compact development can be a tool for more environmentally sensitive development going forward.

Comments received from the County Executive (©5-7) and the Department of Environmental Protection (©13) highlight concerns with coverage of this topic in the Plan.

The last paragraph in this section states that the Plan proposes a series of strategies to mitigate the effects of climate change and minimize pollution. **Are there strategies, policies or actions? Should there be some mention of the strategies (or policies) in the Plan designed to mitigate these effects, or should there be a specific chapter that clearly lays out these strategies/policies?**

d. Other Important but Subsidiary Objectives

Thrive offers three other important but subsidiary goals (objectives) that complement the three overarching objectives.

- i. One subsidiary objective is *Improving public health and encouraging active lifestyles*. This section provides a paragraph on the need to recognize the importance of the built environment on health, with a focus on active lifestyle that emphasizes transit, walking, biking, and parks. However, there is a growing body of work on *Housing as Health* and the role, not just of affordability, but the quality and condition of housing, including the appropriateness of the number of people living in a home. **Should policies in the Plan, including in the Housing chapter, more clearly support the goal of public health and the reduction of health disparities? Would a list of actions in this section be appropriate?**
- ii. *Elevating Quality of Design and Highlighting Role of Arts and Culture* are two other subsidiary objectives. At the beginning of this section, the Plan makes a reference to the 1960's Plan, calling out its emphasis on driving and rigid separation of land use; however, many of the goals and policies of the 1993 Refinement improved upon this image and included recommendations such as:
 - Promote art and cultural opportunities at appropriate public and private locations,
 - Create and maintain attractive, functional, and safe communities utilizing innovative approaches and regulatory processes, and
 - Encourage an appropriate mix of land uses to make neighborhoods more self-sufficient, to name a few.

A more appropriate reference should replace the text at the top of page 19. Like the other subsidiary objective, there is no mention of actions that would help elevate quality design, arts, and culture nor a reference to policies that would support such actions. Perhaps this is left to the chapter on Arts, Design and Culture, which could be referenced here for clarity.

Would a list of actions be appropriate? If so, should policies in the Plan that provide guidance or support such actions be mentioned as well or at least referenced?

4. Urbanism as an Organizing Principle

Thrive Montgomery 2050 applies the principles of urbanism – a term this plan uses as shorthand for a set of ideas about what makes human settlements successful – to guide their future growth. Urbanism as an organizing principle that fits well with the overall direction of the Plan, particularly in the sense the term is used here. However, the last two paragraphs in this section seem disjointed.

The second to last paragraph states: “With attention to both the functional and aesthetic aspects of design, urbanism is not only consistent with a commitment to maintaining the best of what has made Montgomery County attractive in the past but is necessary to preserve and build on these qualities while correcting the errors of auto-centric planning and its damaging effects on the environment, racial equity and social cohesion.”

Followed by: “These issues are complex and have multiple causes, many of them outside the scope of land-use planning and therefore the direct influence of Thrive Montgomery 2050, However, land-use regulation and other policies adopted by local government play an instrumental role in perpetuating, and even reinforcing, many associated undesirable outcomes such as lack of connectedness and social isolation of the young and elderly.” **Should this text be revised to more clearly convey the value of urbanism and its limitations?**

5. A Blueprint for the Future

A Blueprint for the Future is a user’s guide to the plan. It describes current challenges facing the County, such as job losses as a result of the pandemic, social unrest sparked by the killing of George Floyd, and the increased frequency and severity of extreme weather events as justification for “taking steps to strengthen our economic, social, and environmental resilience without delay”. In fact, it continues, “The current public health crisis and emergent demands for action to address police misconduct may recede or be resolved in the coming months, but rapid technological, demographic, and social change will continue to test our collective ability to respond effectively and adapt to new circumstances. The consequences of these changes are already playing out in the lives of our residents, reshaping our hopes and fears about the future. Thrive Montgomery 2050 establishes a blueprint for the work of implementing the new approaches needed to respond, starting immediately and extending over a period of decades.”

While expansive, and not without merit, the sentiments expressed in the preceding text ignores the limitation of the general plan to policies that guide the use of land and development. **Should this section be revised to provide a more focused or connected picture of the role of the general plan in relationship to changing conditions?**

Next, the six chapters of the plan are listed, followed by an explanation of how the chapters are connected to each other. In describing the organization of the chapters, the plan states: “Each

chapter also includes its own set of issues and challenges that are addressed through a set of goals, policies, and actions.” This is most likely a remnant from the Public Hearing Draft.

It is true, the Planning Board Draft does contain references to goals, policies, practices and actions; however, the consistent, hierarchical format used in the Public Hearing Draft was not retained. The use of the terms policy, practice, goal, and action are treated differently throughout the Planning Board Draft (depending on the chapter). Preceding text typically states that the following are policies and practices, or policies and actions; however, they aren’t labelled as such, nor is there an explanation of how they relate within the chapter (although one could guess based on placement and font size) or across chapters when different terms are used.

For example, the Planning Board Draft chapter on housing refers to policies and actions followed by statements in blue font (assuming those are policies) and then regular font (assuming those are actions⁷). The Art, Design, and Culture chapter refers to policies and practices followed by statements in blue font (assuming those are policies) then regular font (assuming those are practices), then bulleted text below that referred to as goals⁸. And, in the Complete Communities chapter the text in blue font and the following text in regular font are all referred to as policies⁹.

As noted above, the Public Hearing Draft includes a clear organization structure. The Draft is organized into eight chapters. Each chapter includes its own set of issues and challenges that are addressed through a set of vision, goals, policies, and actions. According to the Draft:

“The overall vision and goals for each chapter are broad aspirational statements about what Montgomery County wants to accomplish over the next 30 years. Each chapter also includes more detailed policies and actions to achieve these goals.

- The policies are statements of intent and provide ongoing guidance for taking specific actions towards achieving the goals.
- Actions are concrete steps with specific outcomes or products that, individually or in combination with other actions, achieve the goals and policies of the Plan.

Many of these policies and actions will achieve multiple goals as the issues and challenges they address are complex and interrelated.”

In a fashion similar to the Public Hearing Draft, the Minneapolis 2040 plan provides a table for each goal in the Plan and lists all applicable policies that support the goal (across different elements/ chapters of the Plan – including page numbers). **Should consistent terminology, hierarchy and graphics be used throughout the draft to clearly communicate the Plan’s goals, policies, and actions?**

The next to last paragraph in this section provides a concise statement of the vision of Thrive. This is probably one of the most fundamental differences between this Plan and the County’s

⁷ However, the draft also states that all actions are in a separate appendix.

⁸ Which seems odd to have a goal as the lowest in the hierarchy, typically goals are the highest.

⁹ This observation may strike some as a picky formatting comment, but as a policy document, clearly stating what the policies are and how they relate to broader goals and/or objectives as well as actions, is critical for providing guidance to readers now and in the future.

prior general plans. It is also a noteworthy difference between this Plan and general plans adopted both locally (such as Frederick and Prince George’s Counties) and across the country.¹⁰

Interestingly, the vision section in the Public Hearing Draft spans three pages and includes 10 vision “topics”. It also introduces new types of corridors to connect Complete Communities to the rest of the County: a multimodal transportation and services corridor, and a green parks, stream valleys, and trails corridor.

In fact, the importance of understanding the vision of the Plan was highlighted in the presentation provided at the July 21st worksession where 10 out of 24 slides illustrated information which formed the vision for Thrive. In particular, slide 23 provides a concise but truly informative picture of what drives Thrive 2050.

Given the fundamental role of the vision in creating a general plan, should the vision be afforded its own section¹¹ including references to community thoughts on the future of the County, and graphics?

6. General Observations

The Montgomery County Department of Transportation submitted comments on the Draft Plan (©14), many of which are specific to the chapter on Transportation and Communication Networks; however, two broad observations are worth noting here:

- 1) “Current Context: The plan should more overtly establish the context within which it was developed. It includes some scattered references to COVID, Vision Zero, climate change, and social justice topics. These might be highlighted more directly as part of an introductory section so that readers in the future can have an awareness of how these topics were experienced and applied to the plan. In order to plan for the next 30 years and beyond, the Plan must identify and discuss major technological changes that have recently occurred or that are expected to occur, including recent & ongoing developments in Big Data & GIS analysis, ridehail, bikeshare, dockless bikes & scooters, electric bikes, electric vehicles, drones, Connected & Automated Vehicles, and telecommuting.”
- 2) “Regional Relationships: The plan appears very insular. Part of Montgomery County’s strength is its connections to the region as a whole. More specificity should be provided on how these connections should be reinforced or changed, particularly as many households are supported by jobs outside of the County. We rely on the region for goods, services, jobs, education, and travel. How will we stay connected and take advantage of regional changes, and how will we leverage regional anchor institutions?”

The lack of forward-looking text and graphics is an often-heard comment. There are only five figures in the Plan that depict data past 2020, three of which show data on population estimates to 2040 in some form (total population or by age group), The other two figures show building

¹⁰ The plans provided as context for the July 14 worksession all contain a chapter dedicated to the vision of the plan.

¹¹ The Public Hearing Draft included a separate section on the Plan Vision.

permit data to 2030 and estimates of homeownership to 2040. **Should the Plan include more forward looking data, such as estimated growth in employment, travel trends, and factors affecting the environment- not as a predictor of the future, but to help frame the policy recommendations in the Plan which are designed to achieve a vision for 2050?**

Other Minor Observations

Below are other minor observations regarding the Introduction:

- On page 1, inclusionary zoning should be added to the list of Montgomery County successes that resulted from earlier general plans.
- On page 11, the economic impact of the pandemic on the life science industry is noted; however, the Plan neglects to mention its impact on the hospitality industry (the other major employment sectors in the County). It should be noted as well.
- On page 13, the last paragraph reference to Wedges and Corridors should reference the 1993 Refinement as the current plan providing guidance on general land use.
- On page 17, a reference to energy-efficient building standards should be listed along with reduced reliance on driving and more energy-efficient development patterns, as an essential element to meet climate objectives.

Attachments

County Executive's Comments on Thrive
Department of Environmental Protection Comments
Comments Submitted by the Department of Transportation

© Pages

1-12
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OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

MEMORANDUM

June 10, 2021

TO: Tom Hucker, Council President

FROM: Marc Elrich, County Executive 

SUBJECT: County Executive's Comments on Thrive Montgomery 2050 amendment to the General Plan

Pursuant to Sec. 33A-7 of the Montgomery County Code, here are my comments on Thrive Montgomery 2050 amendment to the General Plan.¹

I. INTRODUCTION— Montgomery County residents are confused and inadequately informed about Thrive Montgomery 2050 and know little, if anything, about the Attainable Housing Strategies Initiative's complicated rezoning proposals that will make sweeping changes to their neighborhoods. I request that the Council separate the two projects and ask the Planning Board to stop work on elaborate rezoning proposals that would implement Thrive Montgomery before the plan has even been approved.

The Executive objected to the county's moving forward with Thrive Montgomery 2050 during an historic pandemic that overwhelmed government and residents with unceasing concerns about working and schooling while confined to home and experiencing economic hardship, business dislocations, and potential illness, and even death. These have not been circumstances in which our residents have had time to consider the first revision of the General Plan in 28 years, one that will shape the county's future development over the next 30 years.

Similarly, residents certainly are not able to understand and participate simultaneously in esoteric, elaborate rezoning proposals through an expedited, opaque Attainable Housing Strategies Initiative (AHSI) with an insider's group called the Housing Equity Advisory Team (HEAT), as described in detail below. The rezoning proposals are moving ahead even though the Thrive Montgomery 2050 principles that would justify these proposals have not yet been enacted or even considered by the County Council. In

¹ I am also attaching OMB's request, pursuant to Sec. 33A-7, for an Extension of Time for filing the Financial Impact Statement, as well as updating the Council president that the Executive branch will submit further technical comments from county agencies, prior to the Council's work sessions.

the meantime, hundreds of thousands of county homeowners have absolutely no idea what AHSI is, or what is about to happen to their properties in the next few months.

AHSI has already developed complex proposals to rezone large swaths of the entire county with different densities and housing types, and different rules for certain housing types for different locations. The new zoning proposals were presented for the first time on May 18 to HEAT.²

The Planning Department held four meetings with HEAT, and three meetings with the Community. HEAT's fourteen members³ were selected by the Planning Department to advise Planning on the AHSI. It appears that there was no public process or criteria for the selection. The names of the members are available in the meeting videos and in the PowerPoint for the new zoning proposal. There are no biographies, although the Planning Department and the members have mentioned generally HEAT members' occupations.⁴ Videos of the meetings are posted online, and as of Meeting #3, the general public could "attend" the meeting by sending a request to Planning beforehand. Participation was limited to sending in questions. Planning has also included the Chat discussions in most of the videos. Planning posted its written presentations, including the zoning proposal, with the video of the meeting.

The virtual Community meetings were accessed by signing up. Residents were able to speak directly to the Planning Staff and to each other. Planning didn't share its rezoning proposals directly with the community until the June 2nd Community meeting.⁵ There were, and are, virtual "Office Hours" where residents can ask questions.⁶ Unfortunately, attendance at, and viewing of these virtual meetings has not been robust.

The process allowed the HEAT members to have direct access to Planning Staff for the drafting of the zoning proposals and were asked their opinions on important decisions that were part of the Thrive review - for example, whether the new zoning rules would extend a half-mile or one mile from transit. It is

² <https://montgomeryplanning.org/wp-content/uploads/2021/05/HEAT-Meeting-4.pdf>

³ The members of HEAT are Dave Ager, Liz Brent, Karen Cordry, Amanda Farber, David Flanagan, Tracy Grisez, Ryan Hardy, Bill Kirwin, Gerrit Knapp, Cary Lamari, Jane Lyons, Damon Orobona, Sarah Reddinger, and Xiaochen Zhang.

⁴ <https://montgomeryplanning.org/planning/housing/attainable-housing-strategies-initiative/housing-equity-advisory-team/>

Here's how the Planning department described HEAT:

As part of the [Attainable Housing Strategies Initiative](#), we created an external advisory team called the Housing Equity Advisory Team, or HEAT. The HEAT consists of county stakeholders that approach this issue from different perspectives. It includes developers (both for-profit and non-profit), a realtor, civic activists, housing activists, an economist and someone from the banking industry.

⁵ By then the proposals had already had some revisions, according to HEAT members.

⁶ There is no doubt that Planning staff has worked very hard to reach as many members of the community as possible. In fact, they are continuing to engage in community outreach through meetings and social media. The problem is that the outreach for AHSI only started at the beginning of March. During this time, communities were focused on understanding Thrive with the goal of participating at the County Council's Public Hearings on June 17 and 29. Residents have also been dealing with the unrolling of the vaccinations and the ever-changing school policies with regard to reopening this spring. As a result, AHSI has been under the radar.

important to note that some HEAT members are developers and real estate professionals who may benefit from the changes in the zoning.

In the meantime, there were different community participants at each of the sessions, and they did not receive the zonings proposals until more than two weeks after HEAT members had received them. Thus the process favored developers and supporters of the rezoning who successfully impacted the legislative recommendations. Despite their best efforts, Planning Staff was unable to achieve the broad community outreach that is necessary to allow informed input from a broad group of community stakeholders. The Planning Staff recommendations will be presented to the Planning Board in two weeks—and while Planning Staff continues to pursue other kinds of public outreach, the AHSI has so far accommodated insiders over the general public at a crucial point in the process.

I request that the Council separate the two projects and ask the Planning Board to stop work on proposals that would implement Thrive Montgomery before the plan has even been approved.

Once the General Plan is enacted after receiving a full vetting that a thirty-year plan deserves, the AHSI can be considered along with other strategies necessary to move the county forward. The parallel courses of the General Plan and the AHSI are not only confusing but suggest a predetermined outcome before the public has even been able to offer testimony about the Thrive plan. The situation is compounded by the tight and overlapping time frames for review of these two major land use proposals, with the Planning Board's review of the Attainable Housing Strategies Initiative sandwiched between the Council's two public hearing dates on Thrive.

II. THRIVE MONTGOMERY SHOULD ADDRESS THE COUNTY'S DYSFUNCTIONAL SYSTEM FOR DEVELOPMENT REVIEW.

The General Plan, until now referred to as the Wedges and Corridors Plan, is an important document that has guided the county's physical development since 1964.⁷ Its goal is to frame the county's built future and to embrace new, achievable concepts—bold ideas—that will better serve the county and the people who live here. These ideas may take a long time to reach fruition, but it is important that they be included: food for thought for our future.

Two bold ideas that came out of Wedges and Corridors and its amendments are the MPDU program—that originated in Montgomery County—and the Agricultural Reserve, which was an idea long before it became a reality. While both the 1964 General Plan and the 1969 Amendment⁸ supported the preservation of farmland, the Agricultural Reserve was not created until 1980.⁹

Thrive Montgomery should continue the tradition of bold, forward-looking ideas by including a recommendation for the county to study merging all functions of the development approval and permitting process under one agency.

The current system for development review is dysfunctional. The Executive Advisory Group's report, "An Economic Roadmap to Recovery and Long-Term Success", states, "The combination of a unique structure for real estate projects including an independent planning function and a separate County

⁷ <https://montgomeryplanning.org/planning/master-plan-list/general-plans/wedges-corridors-general-plan-1964/>

⁸ <https://montgomeryplanning.org/planning/master-plan-list/general-plans/updated-general-plan-1969/>

⁹ <https://montgomeryplanning.org/wp-content/uploads/2016/09/PreservationAgricultureRuralOpenSpaceFunctionalMasterPlan1980ocr300.pdf>

permitting process has created inefficiencies and frustrations.”¹⁰ Thrive should recommend that this “unique structure” be re-examined. It is off-putting to developers considering working in the County and to residents who must become mired in the complexities in order to have a voice. Fixing the approval and permitting process is essential. A more normative approval and permitting system will attract more developers, enhance competition, and lead to better community participation.

Thrive does not address these issues. Instead, it recommends adding workarounds to avoid the system entirely. **Planning’s proposal for by-right infill development relies on cookie cutter Pattern books to be used in every circumstance in every part of the county with no community input. It is a clumsy idea for a county of our size and maturity, seemingly intended to circumvent a development approval system badly in need of change.** We should find a better way, by adding reform of the development system to our policy goals for the next 30 years.

III. THE GENERAL PLAN MUST INCLUDE SUBSTANTIVE RECOMMENDATIONS FOR ECONOMIC DEVELOPMENT, ENVIRONMENTAL RESILIENCE, AND EQUITY THAT WILL BUILD ON THE COUNTY’S SUCCESSES AND ADDRESS ITS CHALLENGES.

The Planning Board draft focuses too much on national and international planning trends for Missing Middle Housing (MMH) and 15-minute living which is for cities. While it has been adopted by the Mayor of Paris, it isn’t suitable for a county encompassing 507 square miles. In fact, it glosses over the most pressing land use needs of Montgomery County over the next 30 years.¹¹ The draft presents many salient facts about the county—the lack of job growth over the last 10 years, the lack of diversity in some parts of the county, and the real harms from climate change that have already begun. But instead of recommending a comprehensive, fine-grained plan with a range of land use options, the Planning Board advocates MMH and Complete Communities as a one-size-fits-all plan for 32 activity centers and 11 corridors throughout the county.

Unfortunately, the county will not solve its economic development, environmental resilience, and Equity issues simply by rezoning most of the county’s residential zones—we tried that by rezoning our commercial areas with CR zones, with little success. Retrofitting with infill housing is very complex. Infill development must address not only the needs of new residents but also the needs of the existing community, environmental impacts, and potential displacement and gentrification. These complex planning issues are best done through small, context-sensitive plans, not through county-wide form based zoning with Pattern books. Washington, D.C.—with many of the same concerns—is beginning to use Small Area Planning (SAP) to achieve its goals.¹² We should, too.

A. Economic Development: The 1964 Wedges and Corridors Plan states that “Already urbanized areas should be encouraged to develop to their fullest capacity.”⁸ The county should affirm this recommendation and prioritize economic development that will bring jobs to our large urban centers like White Flint and Silver Spring.

¹⁰ https://www.montgomerycountymd.gov/OPI/Resources/Files/2020/EAG_Roadmap_11-2020.pdf, p. 7.

¹¹ The draft glosses over the county’s land use needs in two ways: 1) the narrative is much broader than the recommendations; and 2) even where there are recommendations, many of them are vague and generic, almost an aside to the main topic of urbanizing the county through Complete Communities.

¹² https://www.washingtonpost.com/opinions/local-opinions/mary-cheh-gentrification-dc-comprehensive-plan/2021/03/11/c0f1d58a-802f-11eb-ac37-4383f7709abe_story.html

These urban centers are the county's economic engine. The county's first priority must be to bring jobs that will lead to the completion and revitalization of our large centers where we have high-quality transit. Thrive's recommendations to spread our limited CIP funds over 32 centers of activity and 11 corridors is contrary to what should be the #1 priority.

That's why I have proposed, and this Council has supported, a pandemic center in White Flint. And this is just a start. Recent reports by the Planning Department confirm this, raising red flags about White Flint¹³ and Silver Spring.¹⁴

1. Low levels of job growth in Montgomery County are presenting the principal challenge to housing projects moving forward in White Flint.

The Planning Department's excellent study, *Advancing the Pike District*, paints a picture of what needs to happen in White Flint. It has staging capacity under the White Flint Sector Plan and there are large undeveloped parcels that could develop quickly if market conditions change. The report, however, makes clear that one of the principal reasons that White Flint development is stalled is the lack of job growth that has depressed the formation of new households. "Developers interviewed cited the low levels of job growth, the resulting slow pace of household formation and reduced demand for new apartments in the Pike District, as the principal challenges limiting their ability to advance new projects." p. 11

2. Silver Spring Downtown, not the Adjacent Communities, needs the county's full attention.

In preparation for the Silver Spring Downtown and Adjacent Communities Master Plan, Planning Staff with the help of the consultant Partners for Economic Solutions (PES) prepared a market study for the downtown Silver Spring retail and office market. The findings of the study are attention-grabbing:

- a. Office: "Currently, 18 percent of office space in downtown Silver Spring is vacant, sharply up since Discovery Communication's decision to relocate...." At the average pace of absorption between 2010 and 2020, even though 2018 was a very good year, it would take 53 years for office vacancy to decline to 9%.
- b. Retail: "PES estimates that 11% of retail space is vacant and that at the average pace of a absorption from 2017 to 2019 it could take 7 to 8 years for vacancy to fall to a healthier 5 per cent level."

The consultants recommended that the County provide incentives, an active recruitment of tenants, and a focused marketing and management plan. They also predicted that some offices would be converted to residences.

These concerns must be addressed as soon as possible, while also pressing forward with White Oak, Wheaton, and the redevelopment of office parks. Bethesda, too, must have the resources to stay competitive. We must focus on job growth in our large centers with high quality transit and not disperse employment throughout the county.

B. Environmental Resilience— The absence of *direct* recommendations related to environmental resilience is glaring. A new chapter, drawing on the substantive staff

¹³ <https://montgomeryplanning.org/planning/communities/midcounty/white-flint/advancing-the-pike-district/>

¹⁴ https://montgomeryplanning.org/wp-content/uploads/2020/12/Development-Trends-Report_FINAL_HR.pdf

recommendations in the *Healthy and Sustainable Solutions* chapter in the Public Hearing Draft, along with DEP recommendations, should be included in the General Plan.

- 1. While environmental issues such as energy efficient buildings, modern/enhanced stormwater management and others are mentioned throughout the draft, they are mostly *implied* as opposed to being *explicit*. Similarly, most of the environmental recommendations are *indirect* and flow from the thrust of the draft - “urbanism,” compact development, infill, complete communities. The Planning Board draft appears to assume that urbanism by itself is sufficient to address our environmental challenges. It is not.**

There may be significant environmental benefits associated with urbanism, such as shorter and fewer vehicle trips, although achieving this result may be more difficult in a large county, as opposed to a city. However, the plan must include actions that are restorative and regenerative as opposed to simply doing less harm by “minimizing the negative externalities associated with the development of land and intensification of its uses...”¹⁵

The General Plan should include substantive and *direct* actions to require state-of-the-art energy efficiency in new buildings, and modern/enhanced stormwater management--**including recommendations to address the repeated concentration of stormwater management waivers in certain areas of the county.**

The plan should also include substantive and *direct* actions that increase green space, forested area, and tree canopy; support regenerative agriculture; enhance pollination and biodiversity; facilitate distributed energy; battery storage and grid modernization; and better facilitate composting/food waste recovery and other circular economy solutions.

- 2. Montgomery County is already experiencing the impacts from climate change. These will only get worse. The General Plan should include specific recommendations related to enhancing resilience.**

There should be explicit actions to address supply chain and utility service disruptions such as the creation of resilience hubs, innovative food security strategies such as more widespread community gardens and “edible forests” and import-substitution strategies to build greater economic self-sufficiency.

- 3. The county must reaffirm its unconditional support for the Agricultural Reserve and reject the Planning Board’s attempts to weaken the Reserve by no longer supporting farming as the preferred use in the Reserve.**

The Planning Board draft recommends that the county “...manage the areas designated within the footprint [of the Reserve] for a rural pattern of development for the benefit of the entire county.” The draft retreats from the support of farming as the preferred use in the Reserve, instead supporting the economic viability of farming and policies to “facilitate a broad range of outdoor recreation and tourism...” p. 20

¹⁵ Planning Board draft, p. 132.

The General Plan must reaffirm the county's commitment to the Agricultural Reserve, and to the 1980 Preservation of Agriculture and Rural Open Space, Functional Master Plan as it did in the 1993 General Plan Refinement.¹⁶

C. Equity—The Planning Board should have paused the Plan when it learned through its own housing study for the Silver Spring Downtown and Adjacent Communities Master Plan that the MMH housing it was proposing was not affordable to Equity groups in the very locations where racial and income diversity were desired. The high cost and high profits of the new housing¹⁷ raise the specter of displacement and gentrification in Wheaton, Silver Spring, and other communities. Thrive must include safeguards against these unintended consequences, as well as many more housing strategies that right now are no more than a line on a page in the Planning Board draft. At a minimum, these strategies should be given equal weight with market rate housing. Finally, new housing should be located near high-quality transit, with the first priority being housing for those with the greatest need.

- 1. The Planning Board errs by focusing on the housing type as the Equity solution, rather than the housing cost.**

The Planning Board's type is unmoored from the price—the affordability--of the housing type. This is because the Planning Board draft's recommendations for MMH were made before the Planning Board had any sense of the relative cost of the new housing types, or their feasibility. But now we do.

The Planning Department's Silver Spring Missing Middle Housing Study found that no MMH types were feasible in downtown Silver Spring except for dense and moderate townhouses that cost \$715,000 and \$855,000, respectively. Similarly, an EYA-built 1500sf triplex on an R-60 lot in the Town of Chevy Chase, would, according to EYA, cost \$875,000!¹⁸

Contrast this to the Planning Board draft's graph of median incomes—Blacks and African Americans and Hispanics have a median income ranging from \$72,000-\$76,000.¹⁹ That income is enough to purchase a home costing \$300,000. Clearly, the county must do more than MMH/Attainable Housing in order to assure Equity in housing.

- 2. The Planning Department was supposed to define Attainable Housing through the AHSI, but so far there is no clear definition. This definition is essential, as is an understanding of the levels of income that will be needed to purchase new market rate housing.**

Right now, there is a complete disconnect between the asserted objective and the reality of who could purchase the new housing.

¹⁶ <https://montgomeryplanning.org/wp-content/uploads/2017/10/GeneralPlanRefinement1993ocr.pdf>, p. 33.

¹⁷ See EYA presentation cited in footnote 19.

¹⁸ <https://drive.google.com/file/d/1FMao-BHI69m21Xla502LgJNWigHYcDhS/view>

¹⁹ <https://montgomeryplanning.org/wp-content/uploads/2021/04/Thrive-Planning-Board-Draft-web.pdf>, p. 14.

3. **Here are multiple, interlocking strategies to make the necessary connections between objectives and costs, and achieve Equity in housing, defined as “the integration of neighborhoods by race and income,”²⁰ with priority for those with the greatest need:**
 - a. **Preserve Naturally Occurring Affordable Housing (NOAH)** as a stated goal for all Plans, as discussed in the Planning Board Preservation of Affordable Housing Study of 2020²¹ and the Planning Board Thrive Public Hearing Draft of October 2020.²² Without effective preservation, the Study predicts that the county will lose between 7,000 and 11,000 housing of 25,900 existing units by 2030. As part of preservation, **the county should discourage teardowns.**
 - b. **Establish a Policy of No Net Loss of market and restricted affordable housing in any redevelopment — ensuring equal numbers and sizes of affordable units, rather than the Planning Board draft language of “refine regulatory tools and financial incentives...without erecting disincentives for the construction of additional units.”²³**
 - i. In order to minimize displacement of people of color and lower income households, the General Plan must state a clear policy objective, as was included in the Public Hearing Draft as part of Goal 5.5.
 - ii. Examples of workable approaches include the Halpine View property in the Veirs Mill Corridor Master Plan²⁴ and Fairfax County’s endorsement of a Preservation and No Net Loss Program in April 2021 for inclusion in its Consolidated Plan.
 - c. **Adopt policies for Rent Stabilization.** This tool of land use planning was recommended in the Affordable Housing Preservation Study, p. 16, and identified as a need in the Planning Board Thrive Public Hearing Draft Goal 5.5, as a way to maintain mixed income communities and minimizing displacement.
 - d. **Modify the MPDU policy to increase the numbers and level of affordability of units.** Increasing the numbers of MPDUs required is consistent with the Public Hearing Draft Goal 5.3 and the Planning Board’s 2020 Housing Needs Assessment. In addition, the Council of Governments (COG) Housing Goals define the County’s need for at least 25% and as much as 50% of new units made affordable at lower income; these goals cannot depend on public subsidy alone. The Planning Board Draft language does not establish a goal of increasing MPDUs, recommending only that the county “calibrate the applicability of the MPDU program ... to provide units appropriate for income levels ranging from deeply affordable to workforce.” This is not enough.
 - e. **Revise and strengthen the Planning Board draft’s statement with respect to housing dedicated to special needs populations across all communities, including people**

²⁰ Ibid. p.

²¹ <https://montgomeryplanning.org/wp-content/uploads/2020/11/200914-Montgomery-County-Preservation-Study.pdf>

²² <https://montgomeryplanning.org/wp-content/uploads/2020/10/Public-Hearing-Draft-Plan-Thrive-Montgomery-2050-final-10-5.pdf>

²³

²⁴ <https://montgomeryplanning.org/wp-content/uploads/2020/01/Veirs-Mill-Corridor-Master-Plan-Approved-and-Adopted-WEB.pdf>, p. 101

transitioning from homelessness, those with disabilities, and the elderly. The draft states the goal of integrating these populations into attainable housing; the goal must be to integrate these populations into suitable housing of any kind, including housing for limited incomes.

- f. Use SAP—Small Area Planning**—in our mature communities near transit to assure that we minimize the unintended consequences of new development—displacement and gentrification caused by loss of affordable housing.
- g. Identify suitable tracts of land for development throughout the county**, as was done in the Centers and Boulevards Study, 2006.²⁵ Identifying larger parcels—3 to 5 acres—would allow excellent planned development with economies of scale.

IV. Transportation-- The Public Hearing draft's Goal 7.1 recommended that growth be focused on infill development and redevelopment concentrated around rail and BRT, but the Planning Board removed the transit underpinning. The General Plan should return to the Public Hearing draft's recommendation.

A. The Planning Board's recommendation to designate communities with limited public transit for urbanization with MMH is a new form of sprawl.

The Public Hearing draft recommended that Complete Communities with infill development be located around rail and BRT in Goal 7.1. The Planning Board, however, removed the transit element.²⁶ The current draft recommends MMH and Complete Communities in 32 centers of activity and 11 corridors dispersed throughout the county, including some centers served by only infrequent bus service.²⁷ By adding remote centers with inadequate transit located in areas not designated for intense growth,²⁸ the Planning Board encourages more driving with more Vehicle Miles Traveled (VMTs). The General Plan should return to the recommendation for transit in the Public Hearing draft.

B. The Planning Board draft needs to establish a narrative to explain how the county will transition in the next 30 years from its current level of auto use to biking, rolling, and walking either as independent trips or as a means of getting to transit.

In these uncertain times, the Transportation chapter envisions that Montgomery County will be able to add infrastructure for biking, rolling, and walking that will encourage the use of transit, thus allowing a reduction of the current number of car lanes and the narrowing of the streets in our centers of activity to increase walkability. I welcome that outcome, but the draft plan simply jumps from the present to the Plan's desired outcome, without explaining interim steps. That needs to be done.

C. I support the Planning Board draft's recommendation that no more highways be built and would add the recommendation to remove M-83 from the Master Plan of Highways.

²⁵ http://montgomeryplanning.org/strategic_planning/centers/Framework_Report_Final.pdf Executive Staff has not been able to find a copy of the final report, or the list of properties that the report identified.

²⁶ Comments of Chair Casey Anderson at meeting with Montgomery for All members on March 25, 2021.

Montgomery for All is an organization that supports Thrive, created by Jane Lyons of Coalition for Smarter Growth.

²⁷ See the list of centers on page 31 of the Planning Board draft.

²⁸ See the Growth Areas in the schematic map on p. 31 of the Planning Board draft.

V. Parks—This new chapter²⁹ recommends that urban parks receive priority without analyzing how this recommendation squares with the 2017 Park, Recreation, and Open Space (PROS) Plan.³⁰ The General Plan should contain a recommendation that the Planning Board shall develop criteria for balancing the competing park needs in the urban areas and surrounding neighborhoods.

- A. The Planning Board draft should be revised to include a broader discussion and understanding of general park needs, not just urban parks. That discussion should include a recommendation that Parks establish and follow objective criteria for park selection.**

The Planning Board draft has no discussion of the 2017 PROs Plan and relies on the 2018 Energizing Public Spaces Functional Master Plan (EPS) as the policy basis for its recommendations. The PROS plan establishes a hierarchy of park needs based on resident surveys. In 2017 “residents ranked trails, natural space, wildlife habitat, and nature recreation as the top three (sic) priorities for parks, across a variety of demographic segments.”³¹ This, and other PROS findings, need to be rationalized with the Planning Board’s recommendation to prioritize urban parks.

The need for objective criteria for park selection is highlighted by the Planning Board’s recent approval of a dog park in the heavily used Norwood Park. The Board approved the dog park without any analysis of the impact of the dog park on the existing uses: the toddler playground, free play area, and permitted ballfields, even though under Park standards the dog park was too close to the surrounding homes.

- B. The General Plan must clearly convey that the existence and careful stewardship of park land is in no way a substitute for county-wide policies that foster sustainability and environmental resilience throughout the entire county.**

The removal of the chapter on the environment and its recommendations, and then the addition of a long discussion of Parks’ dedication to Environmental Stewardship in the new Parks chapter is confusing.³² The Parks chapter should be clarified to show that the county understands that its environmental responsibilities go far beyond taking good care of its parks. This is particularly important, because in the 1964 and 1969 Wedges and Corridors plans, before the federal government passed landmark environmental legislation, “environment” was a general word that included conservation, natural resources, and many other concepts.³³ In the 1993 Refinement, the General Plan sets out a new definition of the environment grounded in the federal legislation, and an increased understanding of the environmental context in which land use decisions are made.³⁴

- C. Finally, the Planning Board draft should delete its suggestion that “conservation-oriented parks” would be improved if there were better access in the park for bicyclists, walkers and transit users.³⁵**

Conservation parks are for the preservation of nature, and access to a conservation park is achieved with natural trails for hiking. It is contrary to principles of conservation to open these parks potentially to bike

²⁹ The Public Hearing draft did not have a chapter on Parks.

³⁰ <https://www.montgomeryparks.org/uploads/2018/06/508-2017.PROS-COMPLETE.pdf>

³¹ PROS Plan, p. 6.

³² Planning Board draft, pgs. 115, 122, 1124

³³ https://montgomeryplanning.org/community/general_plans/wedges_corridors/part1-3.pdf, p. 44

³⁴ <https://montgomeryplanning.org/planning/master-plan-list/general-plans/general-plan-refinement-goals-and-objectives-1993/> pgs. 66-68

³⁵ Planning Board draft, p. 115.

trails and pedestrian paths, and as routes for transit users. That is the function of urban parks, like the Western Grove Urban Park, with its hard surface, impervious path that encourages walking to the Friendship Heights Metro.

VI. The AHSI's zoning proposal must contain clear parameters to assure context sensitive planning, the active participation of the community, and sound planning principles.

A. Zoning changes in the R-40, 60, 90, and 200 residential zones may be done only through the master plan process, and any rezoning must be recommended in an approved and adopted master plan.

B. Where proposed zoning changes raise issues of gentrification, loss of NOAH, and/or environmental degradation, the master plan process shall include Small Area Planning (SAP).

C. Require Site Plan for infill development in both the single-family neighborhoods and the denser development in the corridors.

D. Retain compatibility standards. The concept of compatibility is a foundation of our zoning code, part of the DNA of county planning, and must be retained. Form based zoning may work well for large projects on open land where the planner has control of the relationships between all of units. It is not a substitute for compatibility for infill projects in established neighborhoods, or dense projects along our corridors.

CC: Marlene Michaelson, Executive Director, County Council
Pamela Dunn, Senior Legislative Analyst
Casey Anderson, Planning Board Chair
Natali Fani-Gonzalez, Planning Board Member
Gerald Cichy, Planning Board Member
Tina Patterson, Planning Board Member
Partap Verma, Planning Board Member
Gwen Wright, Director of Planning

Attachments: Extension Request



OFFICE OF MANAGEMENT AND BUDGET


Marc Elrich
County Executive

Jennifer Bryant
Director

M E M O R A N D U M

June 09, 2021

TO: Tom Hucker, President, County Council

FROM: Jennifer Bryant, Director, Office of Management and Budget 

SUBJECT: Extension Request: Fiscal Impact Statement for Thrive Montgomery 2050
Planning Board Draft, April 2021

As required by Section 33A-7 of the County Code, we are informing you that transmittal of the Fiscal Impact Statement for the above referenced General Plan, Thrive Montgomery 2050, will be delayed because additional time is needed to coordinate with the affected departments, collect information, and complete our analysis. We will transmit the statement no later than Friday, June 25, 2021.

JB:ps

cc: Claire Iseli, Special Assistant to the County Executive
Debbie Spielberg, Special Assistant to the County Executive
Dale Tibbitts, Special Assistant to the County Executive
Dominic Butchko, Office of the County Executive
Barry Hudson, Director, Public Information Office
Meredith Wellington, Office of the County Executive
Mary Beck, Office of Management and Budget
Pofen Salem, Office of Management and Budget
Chrissy Mireles, Office of Management and Budget



DEPARTMENT OF ENVIRONMENTAL PROTECTION

Marc Elrich
County Executive

Adam Ortiz
Director

TO: Hans Riemer, Chairman
Planning, Housing, and Economic Development (PHED) Committee

FROM: Adam Ortiz, Director
Department of Environmental Protection

SUBJECT: Comments on Thrive 2050

The Department of Environmental Protection (DEP) would like to provide the following comments to the PHED committee on the Thrive 2050 plan developed by the Maryland-National Capital Park and Planning Commission (MNCPPC).

1. The absence of *direct* recommendations related to the environment and resilience is of great concern. A new chapter, drawing on the substantive staff recommendations in the *Healthy and Sustainable Solutions* chapter in the Public Hearing Draft, along with DEP recommendations, should be added back in.
2. While environmental issues such as energy efficient buildings, modern/enhanced stormwater management, and others are mentioned throughout the plan, they are mostly implied as opposed to being explicit. Similarly, most of the environmental recommendations are indirect and flow from the plan's focus on urbanism, compact development, infill, and complete communities.
3. The plan must include actions that are restorative and regenerative as opposed to simply doing less harm by, to use the words from the Planning Board draft, "minimizing the negative externalities associated with the development of land and intensification of its uses."
4. The plan should include substantive and *direct* actions that increase forested areas and tree canopy; improve water quality; support regenerative agriculture; enhance pollination and biodiversity; facilitate distributed energy, battery storage and grid modernization; and better facilitate composting/food waste recovery and other circular economy solutions.
5. Since the impacts from climate change are already bearing down on Montgomery County, and likely to get worse, the plan should include specific recommendations related to building resilience.
6. There should be explicit actions to address supply chain and utility service disruptions such as the creation of resilience hubs, innovative food security strategies such as more widespread community gardens and "edible forests," and import substitution strategies to build greater economic self-sufficiency.



Marc Elrich
County Executive


Christopher R. Conklin
Director

DEPARTMENT OF TRANSPORTATION

M E M O R A N D U M

July 9, 2021

TO: Hans Riemer, Chair
Planning, Housing, and Economic Development Committee
Montgomery County Council

FROM: Hannah Henn, Deputy Director for Transportation Policy
Department of Transportation 

SUBJECT: Thrive Montgomery – Transportation Comments

The Montgomery County Department of Transportation (MCDOT) reviewed the April 2021 Planning Board Draft of the Thrive Montgomery 2050 update to the General Plan and identified numerous opportunities to refine and improve the plan. The most significant points excerpted from our attached detailed comments are included below for consideration by Council. The superscript numbers used throughout this document reference the comment numbers in the detailed comments included as an enclosure. This expands upon the transportation comments in the attached letter from the County Executive dated June 10th, 2021.

- 1) **Current Context:**³ The Plan should more overtly establish the context within which it was developed. It includes some scattered references to the COVID pandemic, Vision Zero, climate change, and social justice topics. These might be highlighted more directly as part of an introductory section so that readers in the future can have an awareness of how these topics were experienced and applied to the plan.

In order to plan for the next 30 years and beyond, the Plan must identify and discuss major technological changes that have recently occurred or that are expected to occur, including recent & ongoing developments in Big Data & GIS analysis, ridehail, bikeshare, dockless bikes & scooters, electric bikes, electric vehicles, drones, Connected & Automated Vehicles, and telecommuting.

Office of the Director

101 Monroe Street, 10th Floor, Rockville, MD 20850 · 240-777-7170 · 240-777-7178 Fax
www.montgomerycountymd.gov/mcdot

montgomerycountymd.gov/311



301-251-4850 TTY

- 2) **Regional Relationship:**⁴ The plan appears very insular. Part of Montgomery County's strength is its connections to the region as a whole. More specificity should be provided on how these connections should be reinforced or changed, particularly as many households are supported by jobs outside of the County. We rely on the region for goods, services, jobs, education, and travel. How will we stay connected and take advantage of regional changes, and how will we leverage regional anchor institutions?
- 3) **Transportation Vision:** This draft is heavily focused on existing and potential urban areas but does not provide significant focus on the large geographic area of lower-density suburban neighborhoods that are unlikely to significantly redevelop. It is unclear how the transportation needs of these areas are addressed by this plan, nor how these areas will be able to achieve the vision of Thrive.¹⁸

Throughout the Thrive process we have suggested a transportation vision for different land uses contexts focused on enabling travelers to access high-frequency transit as early in a trip as feasible:¹⁹

- In high-density areas, this access would entail constructing Parking Lot District garages at the periphery, enabling a more intensive focus on pedestrian, bicycle, and transit infrastructure within urban areas, potentially with some provision for ADA vehicle access.
- Suburban areas would utilize the growth corridors and accompanying high-frequency transit as proposed by Thrive. Thrive does not provide much information for areas between these corridors. We suggest a focus on connecting residents to the high-frequency transit through improved sidewalks, bikeways, Bike & Ride facilities, and micro-transit.
- Thrive's vision for rural areas focuses on a significantly expanded bus network, which, while well-intentioned, may not be fiscally feasible. The Plan needs to recognize that cars are likely to continue to play a significant role in these rural area, and the Plan needs to explain how the rural areas will more effectively connect to the transit network.⁸⁷ MCDOT suggests that these areas consider Park & Ride facilities at regional upstream points or facilities that achieve similar objectives. Transit services might be applied more deliberately as part of updates to area master plans or as part of an Agricultural Functional Plan.

Thrive emphasizes that it is not an anti-car plan but does not articulate the changing role it envisions for private vehicles as part of our transportation system, how the County will transition from its current level of car usage, nor how goods will be transported and services provided in this new transportation vision. Thrive should consider the role of

parking minimums in land development⁴¹ and should also recognize the need for bus depots and transit centers to serve the desired increased ridership.⁸⁶

- 4) **New Highways; Widenings:** Thrive proposes to “stop planning or constructing new highways or major road widenings for cars.” It is important for the public and for decision-makers to understand how this recommendation will be applied to ongoing projects such as Montrose Parkway, M-83, highway interchanges, and the many master planned widenings around the County. It should be more explicitly stated if it is intended that Thrive will be the true end to these projects without further analysis.³¹

It is also unclear how the statement quoted above will be applied to facilities that are part of new transitways, as is the case with Observation Drive and the Corridor Cities Transitway.³² Importantly, there needs to also be clarification about the recommendation’s focus on cars. Taken literally, this recommendation would mean that all new highways and widenings could proceed, as long as they included provisions for public transit or any non-car use.

The Plan needs to articulate the next steps for areas impacted by these projects. Updates to area master plans or and the Master Plan of Highways and Transitways should consider what other infrastructure may be necessary to ensure travelers have alternatives available, such as new transit facilities/services or additional pedestrian/bicycle infrastructure.* Updated land use plans should pair with these efforts.⁷³ The Executive supports the removal of M-83 from the Master Plan of Highways and Transitways and would welcome these future efforts.

- 5) **Street Grids:** In concept MCDOT supports Thrive’s proposal for more robust street grids, though the proposal would benefit from improved detail on the intent and implementation. It is unclear where grid and alley networks would be developed, how they would be paid for between developer extractions and public capital investments,⁷⁶ or how these new streets would impact parks, streams, and open spaces.²⁸ At a minimum, the Plan should incorporate recommendations for state of the art storm water management infrastructure.

The draft includes contradictory information on street grids. Thrive proposes to construct new streets that would be accessible to cars, while also proposing to stop constructing streets for cars.⁴⁹ Similarly, Thrive proposes a performance metric to reduce lane-miles, which runs counter to expanding the street grid.⁴⁶ Thrive also proposes to “reduce access ... for all modes of transportation,” whereas the spirit of the plan is to *increase* access for non-auto modes.⁷⁵ These contradictory statements must be addressed.

* The suggestion to consider removal of new highways & major widenings was made during the 2018 update to the Master Plan of Highways and Transitways, but the suggestion was not adopted within the scope of the update.

- 6) **Complete Communities:**⁶⁸ The Plan acknowledges that 15 minute communities may not apply everywhere, but the information on this topic is now weaker than in earlier Planning drafts. Throughout the Thrive process MCDOT has suggested how the Complete Communities concept might be better-defined and establish measurable performance metrics that could be used in land use and transportation planning. We believe that Complete Communities should establish three core target variables that area master plans would then define locally. These variables include:

- Travel Time (to be defined as either Peak or Off-Peak)
- Travel Mode
- Destinations

Area master plans might define these variables, with Red policy areas perhaps adopting a 15 minute off-peak travel time by ped/bike/transit to high-frequency / lower-centralization destinations such as major transit stops, grocery stores, parks, civic/recreation centers, libraries, and elementary schools. These same Red policy areas might adopt 30 minutes off-peak by ped/bike/transit to lower-frequency / higher-centralization destinations such as hospitals or high schools. Green policy areas might adopt a 30 minute peak travel time by any mode to frequent / low-centralization destinations, and 60 minutes to infrequent / centralized destinations.

- 7) **Implementation:**¹³ This draft includes the statement that "implementation [of Complete Communities] will be primarily market driven." It is unclear how transportation actions may be conditioned, especially if new street grids take substantial portions of land parcels or if their needs are disproportionate to the development that is occurring alongside them. Market-driven implementation is not guaranteed with land development, as market dynamics (especially lenders) tend to be fiscally conservative, rarely piloting or testing new concepts. Without stronger clarity or action in this document, it appears likely that Thrive may end up with the status quo more often than envisioned.

Moreover, it should be noted that if “market driven” refers to how Complete Communities will be funded, there is no requirement for developer contributions as part of “by right” development. Currently, all the proposed changes to the single family neighborhoods are “by right”, meaning the county will have to fund the costs of new infrastructure.

- 8) **Median-Running Transitways:**⁷⁴ The Actions List includes a task (T-2) to "upgrade transitways to median-running." While MCDOT agrees that median-running transitways are a preference, this is an operational consideration beyond the scope of this plan. We require flexibility in transitway design and placement, especially within constrained rights-of-way or alongside atypical traffic patterns, and median-running transitways are not always the best nor appropriate option.

- 9) **Transit Authority; WSTC:**⁸³ The Actions List includes two tasks that would form a subregional transportation or transit authority (T-16) and strengthen the Washington Suburban Transit Commission (T-18). The main body of the Thrive plan, however, doesn't include any accompanying narrative that would establish the predicate for and vision of these actions. These Actions should be deleted. The more non-County agencies – not operating under Thrive – are included in these organizations, the more these groups' activities may run counter to the plan's vision and actions.
- 10) **MARC:** MCDOT strongly supports improving MARC service but cautions that the Actions List proposal for additional stations (T-19) must consider impacts either to system travel times due to having more stations and stoppages, or must overtly address low-ridership stations and put the public on alert if Thrive proposes to cease service to those locations. We note that the State's position consistently has been that, for new stations to be considered, existing stations will have to be removed.⁸⁸ New stations should also consider technical feasibility.[†]

The Plan should include additional recommendations for MARC, such as stating that the Brunswick Line should be considered for through-running into Virginia, or onto other Maryland lines (such as the Penn and Camden), and for maintaining service into West Virginia.⁸⁹

- 11) **Other Major Transportation Services:** We believe that the Plan should strengthen its language on other major transportation services. Suggested modifications include actions and narrative for both public and private commuter buses / shuttles;²⁰ how the County might better utilize Amtrak and advocate for improved service and connectivity;²¹ what vision the County has for air transport, particularly regarding its public and private airports and the popularity of drones;²² and how we might address freight movement both regionally and within urban areas.¹⁰⁰
- 12) **Developing Technology:** This Plan gives little consideration of developing technologies and how the County might position itself to take advantage of these technologies and apply them optimally. While we recognize it can be difficult to predict how these technologies will be realized and what unknown technologies will come to be, as explained above, the Plan must, at a minimum, describe the developing technologies and attempt to establish guiding positions for future scenarios.

Ongoing and upcoming technologies include both ground-based and aerial drones, particularly in the context of parcel delivery,²² and the impacts of Connected and Automated Vehicles on personal vehicle fleets²³ and transit networks.³⁷

[†] We noted during the recent Shady Grove Minor Master Plan Amendment that the proposed MARC station at Shady Grove may be physically infeasible to construct.

13) **Vision Zero:** Thrive is an opportunity for the County to acknowledge and discuss Vision Zero related topics that may not be fully within the County’s control but are of importance to County goals. Such topics may include ped/bike collision requirements for new vehicles, traffic safety devices, driver retesting, and how to ensure drivers’ education and testing curriculums adequately cover new designs, operations, and technology.^{101,102} Thrive also presents an opportunity to address topics related to Connected and Automated Vehicles.²³

14) **Engineering, Education, Enforcement:** In considering the popular mantra of the “Three E’s” – Engineering, Education, Enforcement[‡] – the Plan does not give significant consideration of the roles of the latter two. We believe the Plan should include recommendations for expanded educational and outreach programs, including traffic gardens/playgrounds as well as traffic safety / bike maintenance curriculums in schools.¹⁰⁵

The Plan also presents an opportunity to include narratives on the role of Enforcement, and how the first goal should be to utilize Engineering and Education to reduce the need for Enforcement at all. Where enforcement remains necessary, the Plan might establish a preference toward the use of automated enforcement, which can more equitably apply the law while also reducing the risks and frequency of police interactions. This same statement might also acknowledge that even automated enforcement systems must themselves be applied equitably, and existing regressive penalty systems are themselves not equitable.¹⁰³

15) **Zero Emission / Electric Vehicles:** The Plan establishes a vision for Zero Emission / Electric Vehicles (ZEVs), which is a good effort in the near-term but should not be considered a final stage in achieving environmental goals. ZEVs are still vehicles, which includes infrastructure needs, traffic impacts, Vision Zero risks, and environmental impacts.⁹⁶ Thrive’s goals toward increasing the number of ZEVs might instead be better phrased as increasing the *share* of ZEVs among the vehicle fleet.³⁹

16) **Actions List:** The Actions List, as written, is poorly organized, contains many overlapping and redundant actions, has actions located in some less-applicable topic areas albeit missing in more-applicable topic areas, and has some actions that are not referenced at all in the main body of the Plan. We suggest that the Actions List be reformatted to improve ease of comprehension, with the goal of ensuring that actions are not overlooked.⁵³

17) We understand that the Actions List, as an appendix, is not part of the Plan. It seems to incorporate some of the recommendations that were in the main body of the Public Hearing Draft, but in the Public Hearing Draft, these recommendations were obligatory. The Plan needs more specificity, and the Council should review all of the recommendations in the Public Hearing Draft to see which ones should be restored to the Plan.⁵²

[‡] Recognizing that there has been interest in additional E’s, such as Evaluations, Ethics, and Equity.

Thrive Montgomery – Transportation Comments

July 9, 2021

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Should you have any questions regarding our comments on the plan, please feel free to contact me or Mr. Andrew Bossi, Senior Engineer, at andrew.bossi@montgomerycountymd.gov.

Enclosures: Detailed Technical Comments
 June 10th Letter from County Executive to Council

HH:AB

cc: Chris Conklin, MCDOT
 Gary Erenrich, MCDOT
 Andrew Bossi, MCDOT
 Meredith Wellington, CEX
 Glenn Orlin, Council
 Pamela Dunn, Council




OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

MEMORANDUM

June 10, 2021

TO: Tom Hucker, Council President

FROM: Marc Elrich, County Executive 

SUBJECT: County Executive's Comments on Thrive Montgomery 2050 amendment to the General Plan

Pursuant to Sec. 33A-7 of the Montgomery County Code, here are my comments on Thrive Montgomery 2050 amendment to the General Plan.¹

I. INTRODUCTION— Montgomery County residents are confused and inadequately informed about Thrive Montgomery 2050 and know little, if anything, about the Attainable Housing Strategies Initiative's complicated rezoning proposals that will make sweeping changes to their neighborhoods. I request that the Council separate the two projects and ask the Planning Board to stop work on elaborate rezoning proposals that would implement Thrive Montgomery before the plan has even been approved.

The Executive objected to the county's moving forward with Thrive Montgomery 2050 during an historic pandemic that overwhelmed government and residents with unceasing concerns about working and schooling while confined to home and experiencing economic hardship, business dislocations, and potential illness, and even death. These have not been circumstances in which our residents have had time to consider the first revision of the General Plan in 28 years, one that will shape the county's future development over the next 30 years.

Similarly, residents certainly are not able to understand and participate simultaneously in esoteric, elaborate rezoning proposals through an expedited, opaque Attainable Housing Strategies Initiative (AHSI) with an insider's group called the Housing Equity Advisory Team (HEAT), as described in detail below. The rezoning proposals are moving ahead even though the Thrive Montgomery 2050 principles that would justify these proposals have not yet been enacted or even considered by the County Council. In

¹ I am also attaching OMB's request, pursuant to Sec. 33A-7, for an Extension of Time for filing the Financial Impact Statement, as well as updating the Council president that the Executive branch will submit further technical comments from county agencies, prior to the Council's work sessions.

the meantime, hundreds of thousands of county homeowners have absolutely no idea what AHSI is, or what is about to happen to their properties in the next few months.

AHSI has already developed complex proposals to rezone large swaths of the entire county with different densities and housing types, and different rules for certain housing types for different locations. The new zoning proposals were presented for the first time on May 18 to HEAT.²

The Planning Department held four meetings with HEAT, and three meetings with the Community. HEAT's fourteen members³ were selected by the Planning Department to advise Planning on the AHSI. It appears that there was no public process or criteria for the selection. The names of the members are available in the meeting videos and in the PowerPoint for the new zoning proposal. There are no biographies, although the Planning Department and the members have mentioned generally HEAT members' occupations.⁴ Videos of the meetings are posted online, and as of Meeting #3, the general public could "attend" the meeting by sending a request to Planning beforehand. Participation was limited to sending in questions. Planning has also included the Chat discussions in most of the videos. Planning posted its written presentations, including the zoning proposal, with the video of the meeting.

The virtual Community meetings were accessed by signing up. Residents were able to speak directly to the Planning Staff and to each other. Planning didn't share its rezoning proposals directly with the community until the June 2nd Community meeting.⁵ There were, and are, virtual "Office Hours" where residents can ask questions.⁶ Unfortunately, attendance at, and viewing of these virtual meetings has not been robust.

The process allowed the HEAT members to have direct access to Planning Staff for the drafting of the zoning proposals and were asked their opinions on important decisions that were part of the Thrive review - for example, whether the new zoning rules would extend a half-mile or one mile from transit. It is

² <https://montgomeryplanning.org/wp-content/uploads/2021/05/HEAT-Meeting-4.pdf>

³ The members of HEAT are Dave Ager, Liz Brent, Karen Cordry, Amanda Farber, David Flanagan, Tracy Grisez, Ryan Hardy, Bill Kirwin, Gerrit Knapp, Cary Lamari, Jane Lyons, Damon Orobona, Sarah Reddinger, and Xiaochen Zhang.

⁴ <https://montgomeryplanning.org/planning/housing/attainable-housing-strategies-initiative/housing-equity-advisory-team/>

Here's how the Planning department described HEAT:

As part of the [Attainable Housing Strategies Initiative](#), we created an external advisory team called the Housing Equity Advisory Team, or HEAT. The HEAT consists of county stakeholders that approach this issue from different perspectives. It includes developers (both for-profit and non-profit), a realtor, civic activists, housing activists, an economist and someone from the banking industry.

⁵ By then the proposals had already had some revisions, according to HEAT members.

⁶ There is no doubt that Planning staff has worked very hard to reach as many members of the community as possible. In fact, they are continuing to engage in community outreach through meetings and social media. The problem is that the outreach for AHSI only started at the beginning of March. During this time, communities were focused on understanding Thrive with the goal of participating at the County Council's Public Hearings on June 17 and 29. Residents have also been dealing with the unrolling of the vaccinations and the ever-changing school policies with regard to reopening this spring. As a result, AHSI has been under the radar.

important to note that some HEAT members are developers and real estate professionals who may benefit from the changes in the zoning.

In the meantime, there were different community participants at each of the sessions, and they did not receive the zonings proposals until more than two weeks after HEAT members had received them. Thus the process favored developers and supporters of the rezoning who successfully impacted the legislative recommendations. Despite their best efforts, Planning Staff was unable to achieve the broad community outreach that is necessary to allow informed input from a broad group of community stakeholders. The Planning Staff recommendations will be presented to the Planning Board in two weeks—and while Planning Staff continues to pursue other kinds of public outreach, the AHSI has so far accommodated insiders over the general public at a crucial point in the process.

I request that the Council separate the two projects and ask the Planning Board to stop work on proposals that would implement Thrive Montgomery before the plan has even been approved.

Once the General Plan is enacted after receiving a full vetting that a thirty-year plan deserves, the AHSI can be considered along with other strategies necessary to move the county forward. The parallel courses of the General Plan and the AHSI are not only confusing but suggest a predetermined outcome before the public has even been able to offer testimony about the Thrive plan. The situation is compounded by the tight and overlapping time frames for review of these two major land use proposals, with the Planning Board's review of the Attainable Housing Strategies Initiative sandwiched between the Council's two public hearing dates on Thrive.

II. THRIVE MONTGOMERY SHOULD ADDRESS THE COUNTY'S DYSFUNCTIONAL SYSTEM FOR DEVELOPMENT REVIEW.

The General Plan, until now referred to as the Wedges and Corridors Plan, is an important document that has guided the county's physical development since 1964.⁷ Its goal is to frame the county's built future and to embrace new, achievable concepts—bold ideas—that will better serve the county and the people who live here. These ideas may take a long time to reach fruition, but it is important that they be included: food for thought for our future.

Two bold ideas that came out of Wedges and Corridors and its amendments are the MPDU program—that originated in Montgomery County—and the Agricultural Reserve, which was an idea long before it became a reality. While both the 1964 General Plan and the 1969 Amendment⁸ supported the preservation of farmland, the Agricultural Reserve was not created until 1980.⁹

Thrive Montgomery should continue the tradition of bold, forward-looking ideas by including a recommendation for the county to study merging all functions of the development approval and permitting process under one agency.

The current system for development review is dysfunctional. The Executive Advisory Group's report, "An Economic Roadmap to Recovery and Long-Term Success", states, "The combination of a unique structure for real estate projects including an independent planning function and a separate County

⁷ <https://montgomeryplanning.org/planning/master-plan-list/general-plans/wedges-corridors-general-plan-1964/>

⁸ <https://montgomeryplanning.org/planning/master-plan-list/general-plans/updated-general-plan-1969/>

⁹ <https://montgomeryplanning.org/wp-content/uploads/2016/09/PreservationAgricultureRuralOpenSpaceFunctionalMasterPlan1980ocr300.pdf>

permitting process has created inefficiencies and frustrations.”¹⁰ Thrive should recommend that this “unique structure” be re-examined. It is off-putting to developers considering working in the County and to residents who must become mired in the complexities in order to have a voice. Fixing the approval and permitting process is essential. A more normative approval and permitting system will attract more developers, enhance competition, and lead to better community participation.

Thrive does not address these issues. Instead, it recommends adding workarounds to avoid the system entirely. **Planning’s proposal for by-right infill development relies on cookie cutter Pattern books to be used in every circumstance in every part of the county with no community input. It is a clumsy idea for a county of our size and maturity, seemingly intended to circumvent a development approval system badly in need of change.** We should find a better way, by adding reform of the development system to our policy goals for the next 30 years.

III. THE GENERAL PLAN MUST INCLUDE SUBSTANTIVE RECOMMENDATIONS FOR ECONOMIC DEVELOPMENT, ENVIRONMENTAL RESILIENCE, AND EQUITY THAT WILL BUILD ON THE COUNTY’S SUCCESSES AND ADDRESS ITS CHALLENGES.

The Planning Board draft focuses too much on national and international planning trends for Missing Middle Housing (MMH) and 15-minute living which is for cities. While it has been adopted by the Mayor of Paris, it isn’t suitable for a county encompassing 507 square miles. In fact, it glosses over the most pressing land use needs of Montgomery County over the next 30 years.¹¹ The draft presents many salient facts about the county—the lack of job growth over the last 10 years, the lack of diversity in some parts of the county, and the real harms from climate change that have already begun. But instead of recommending a comprehensive, fine-grained plan with a range of land use options, the Planning Board advocates MMH and Complete Communities as a one-size-fits-all plan for 32 activity centers and 11 corridors throughout the county.

Unfortunately, the county will not solve its economic development, environmental resilience, and Equity issues simply by rezoning most of the county’s residential zones—we tried that by rezoning our commercial areas with CR zones, with little success. Retrofitting with infill housing is very complex. Infill development must address not only the needs of new residents but also the needs of the existing community, environmental impacts, and potential displacement and gentrification. These complex planning issues are best done through small, context-sensitive plans, not through county-wide form based zoning with Pattern books. Washington, D.C.—with many of the same concerns—is beginning to use Small Area Planning (SAP) to achieve its goals.¹² We should, too.

A. Economic Development: The 1964 Wedges and Corridors Plan states that “Already urbanized areas should be encouraged to develop to their fullest capacity.”⁸ The county should affirm this recommendation and prioritize economic development that will bring jobs to our large urban centers like White Flint and Silver Spring.

¹⁰ https://www.montgomerycountymd.gov/OPI/Resources/Files/2020/EAG_Roadmap_11-2020.pdf, p. 7.

¹¹ The draft glosses over the county’s land use needs in two ways: 1) the narrative is much broader than the recommendations; and 2) even where there are recommendations, many of them are vague and generic, almost an aside to the main topic of urbanizing the county through Complete Communities.

¹² https://www.washingtonpost.com/opinions/local-opinions/mary-cheh-gentrification-dc-comprehensive-plan/2021/03/11/c0f1d58a-802f-11eb-ac37-4383f7709abe_story.html

These urban centers are the county's economic engine. The county's first priority must be to bring jobs that will lead to the completion and revitalization of our large centers where we have high-quality transit. Thrive's recommendations to spread our limited CIP funds over 32 centers of activity and 11 corridors is contrary to what should be the #1 priority.

That's why I have proposed, and this Council has supported, a pandemic center in White Flint. And this is just a start. Recent reports by the Planning Department confirm this, raising red flags about White Flint¹³ and Silver Spring.¹⁴

1. Low levels of job growth in Montgomery County are presenting the principal challenge to housing projects moving forward in White Flint.

The Planning Department's excellent study, *Advancing the Pike District*, paints a picture of what needs to happen in White Flint. It has staging capacity under the White Flint Sector Plan and there are large undeveloped parcels that could develop quickly if market conditions change. The report, however, makes clear that one of the principal reasons that White Flint development is stalled is the lack of job growth that has depressed the formation of new households. "Developers interviewed cited the low levels of job growth, the resulting slow pace of household formation and reduced demand for new apartments in the Pike District, as the principal challenges limiting their ability to advance new projects." p. 11

2. Silver Spring Downtown, not the Adjacent Communities, needs the county's full attention.

In preparation for the Silver Spring Downtown and Adjacent Communities Master Plan, Planning Staff with the help of the consultant Partners for Economic Solutions (PES) prepared a market study for the downtown Silver Spring retail and office market. The findings of the study are attention-grabbing:

- a. Office: "Currently, 18 percent of office space in downtown Silver Spring is vacant, sharply up since Discovery Communication's decision to relocate...." At the average pace of absorption between 2010 and 2020, even though 2018 was a very good year, it would take 53 years for office vacancy to decline to 9%.
- b. Retail: "PES estimates that 11% of retail space is vacant and that at the average pace of a absorption from 2017 to 2019 it could take 7 to 8 years for vacancy to fall to a healthier 5 per cent level."

The consultants recommended that the County provide incentives, an active recruitment of tenants, and a focused marketing and management plan. They also predicted that some offices would be converted to residences.

These concerns must be addressed as soon as possible, while also pressing forward with White Oak, Wheaton, and the redevelopment of office parks. Bethesda, too, must have the resources to stay competitive. We must focus on job growth in our large centers with high quality transit and not disperse employment throughout the county.

B. Environmental Resilience— The absence of *direct* recommendations related to environmental resilience is glaring. A new chapter, drawing on the substantive staff

¹³ <https://montgomeryplanning.org/planning/communities/midcounty/white-flint/advancing-the-pike-district/>

¹⁴ https://montgomeryplanning.org/wp-content/uploads/2020/12/Development-Trends-Report_FINAL_HR.pdf

recommendations in the *Healthy and Sustainable Solutions* chapter in the Public Hearing Draft, along with DEP recommendations, should be included in the General Plan.

- 1. While environmental issues such as energy efficient buildings, modern/enhanced stormwater management and others are mentioned throughout the draft, they are mostly *implied* as opposed to being *explicit*. Similarly, most of the environmental recommendations are *indirect* and flow from the thrust of the draft - “urbanism,” compact development, infill, complete communities. The Planning Board draft appears to assume that urbanism by itself is sufficient to address our environmental challenges. It is not.**

There may be significant environmental benefits associated with urbanism, such as shorter and fewer vehicle trips, although achieving this result may be more difficult in a large county, as opposed to a city. However, the plan must include actions that are restorative and regenerative as opposed to simply doing less harm by “minimizing the negative externalities associated with the development of land and intensification of its uses...”¹⁵

The General Plan should include substantive and *direct* actions to require state-of-the-art energy efficiency in new buildings, and modern/enhanced stormwater management--**including recommendations to address the repeated concentration of stormwater management waivers in certain areas of the county.**

The plan should also include substantive and *direct* actions that increase green space, forested area, and tree canopy; support regenerative agriculture; enhance pollination and biodiversity; facilitate distributed energy; battery storage and grid modernization; and better facilitate composting/food waste recovery and other circular economy solutions.

- 2. Montgomery County is already experiencing the impacts from climate change. These will only get worse. The General Plan should include specific recommendations related to enhancing resilience.**

There should be explicit actions to address supply chain and utility service disruptions such as the creation of resilience hubs, innovative food security strategies such as more widespread community gardens and “edible forests” and import-substitution strategies to build greater economic self-sufficiency.

- 3. The county must reaffirm its unconditional support for the Agricultural Reserve and reject the Planning Board’s attempts to weaken the Reserve by no longer supporting farming as the preferred use in the Reserve.**

The Planning Board draft recommends that the county “...manage the areas designated within the footprint [of the Reserve] for a rural pattern of development for the benefit of the entire county.” The draft retreats from the support of farming as the preferred use in the Reserve, instead supporting the economic viability of farming and policies to “facilitate a broad range of outdoor recreation and tourism...” p. 20

¹⁵ Planning Board draft, p. 132.

The General Plan must reaffirm the county's commitment to the Agricultural Reserve, and to the 1980 Preservation of Agriculture and Rural Open Space, Functional Master Plan as it did in the 1993 General Plan Refinement.¹⁶

C. Equity—The Planning Board should have paused the Plan when it learned through its own housing study for the Silver Spring Downtown and Adjacent Communities Master Plan that the MMH housing it was proposing was not affordable to Equity groups in the very locations where racial and income diversity were desired. The high cost and high profits of the new housing¹⁷ raise the specter of displacement and gentrification in Wheaton, Silver Spring, and other communities. Thrive must include safeguards against these unintended consequences, as well as many more housing strategies that right now are no more than a line on a page in the Planning Board draft. At a minimum, these strategies should be given equal weight with market rate housing. Finally, new housing should be located near high-quality transit, with the first priority being housing for those with the greatest need.

- 1. The Planning Board errs by focusing on the housing type as the Equity solution, rather than the housing cost.**

The Planning Board's type is unmoored from the price—the affordability--of the housing type. This is because the Planning Board draft's recommendations for MMH were made before the Planning Board had any sense of the relative cost of the new housing types, or their feasibility. But now we do.

The Planning Department's Silver Spring Missing Middle Housing Study found that no MMH types were feasible in downtown Silver Spring except for dense and moderate townhouses that cost \$715,000 and \$855,000, respectively. Similarly, an EYA-built 1500sf triplex on an R-60 lot in the Town of Chevy Chase, would, according to EYA, cost \$875,000!¹⁸

Contrast this to the Planning Board draft's graph of median incomes—Blacks and African Americans and Hispanics have a median income ranging from \$72,000-\$76,000.¹⁹ That income is enough to purchase a home costing \$300,000. Clearly, the county must do more than MMH/Attainable Housing in order to assure Equity in housing.

- 2. The Planning Department was supposed to define Attainable Housing through the AHSI, but so far there is no clear definition. This definition is essential, as is an understanding of the levels of income that will be needed to purchase new market rate housing.**

Right now, there is a complete disconnect between the asserted objective and the reality of who could purchase the new housing.

¹⁶ <https://montgomeryplanning.org/wp-content/uploads/2017/10/GeneralPlanRefinement1993ocr.pdf>, p. 33.

¹⁷ See EYA presentation cited in footnote 19.

¹⁸ <https://drive.google.com/file/d/1FMao-BHI69m21Xla502LgJNWigHYcDhS/view>

¹⁹ <https://montgomeryplanning.org/wp-content/uploads/2021/04/Thrive-Planning-Board-Draft-web.pdf>, p. 14.

3. **Here are multiple, interlocking strategies to make the necessary connections between objectives and costs, and achieve Equity in housing, defined as “the integration of neighborhoods by race and income,”²⁰ with priority for those with the greatest need:**
 - a. **Preserve Naturally Occurring Affordable Housing (NOAH)** as a stated goal for all Plans, as discussed in the Planning Board Preservation of Affordable Housing Study of 2020²¹ and the Planning Board Thrive Public Hearing Draft of October 2020.²² Without effective preservation, the Study predicts that the county will lose between 7,000 and 11,000 housing of 25,900 existing units by 2030. As part of preservation, **the county should discourage teardowns.**
 - b. **Establish a Policy of No Net Loss of market and restricted affordable housing in any redevelopment — ensuring equal numbers and sizes of affordable units, rather than the Planning Board draft language of “refine regulatory tools and financial incentives...without erecting disincentives for the construction of additional units.”²³**
 - i. In order to minimize displacement of people of color and lower income households, the General Plan must state a clear policy objective, as was included in the Public Hearing Draft as part of Goal 5.5.
 - ii. Examples of workable approaches include the Halpine View property in the Veirs Mill Corridor Master Plan²⁴ and Fairfax County’s endorsement of a Preservation and No Net Loss Program in April 2021 for inclusion in its Consolidated Plan.
 - c. **Adopt policies for Rent Stabilization.** This tool of land use planning was recommended in the Affordable Housing Preservation Study, p. 16, and identified as a need in the Planning Board Thrive Public Hearing Draft Goal 5.5, as a way to maintain mixed income communities and minimizing displacement.
 - d. **Modify the MPDU policy to increase the numbers and level of affordability of units.** Increasing the numbers of MPDUs required is consistent with the Public Hearing Draft Goal 5.3 and the Planning Board’s 2020 Housing Needs Assessment. In addition, the Council of Governments (COG) Housing Goals define the County’s need for at least 25% and as much as 50% of new units made affordable at lower income; these goals cannot depend on public subsidy alone. The Planning Board Draft language does not establish a goal of increasing MPDUs, recommending only that the county “calibrate the applicability of the MPDU program ... to provide units appropriate for income levels ranging from deeply affordable to workforce.” This is not enough.
 - e. **Revise and strengthen the Planning Board draft’s statement with respect to housing dedicated to special needs populations across all communities, including people**

²⁰ Ibid. p.

²¹ <https://montgomeryplanning.org/wp-content/uploads/2020/11/200914-Montgomery-County-Preservation-Study.pdf>

²² <https://montgomeryplanning.org/wp-content/uploads/2020/10/Public-Hearing-Draft-Plan-Thrive-Montgomery-2050-final-10-5.pdf>

²³

²⁴ <https://montgomeryplanning.org/wp-content/uploads/2020/01/Veirs-Mill-Corridor-Master-Plan-Approved-and-Adopted-WEB.pdf>, p. 101

transitioning from homelessness, those with disabilities, and the elderly. The draft states the goal of integrating these populations into attainable housing; the goal must be to integrate these populations into suitable housing of any kind, including housing for limited incomes.

- f. Use SAP—Small Area Planning**—in our mature communities near transit to assure that we minimize the unintended consequences of new development—displacement and gentrification caused by loss of affordable housing.
- g. Identify suitable tracts of land for development throughout the county**, as was done in the Centers and Boulevards Study, 2006.²⁵ Identifying larger parcels—3 to 5 acres—would allow excellent planned development with economies of scale.

IV. Transportation-- The Public Hearing draft's Goal 7.1 recommended that growth be focused on infill development and redevelopment concentrated around rail and BRT, but the Planning Board removed the transit underpinning. The General Plan should return to the Public Hearing draft's recommendation.

A. The Planning Board's recommendation to designate communities with limited public transit for urbanization with MMH is a new form of sprawl.

The Public Hearing draft recommended that Complete Communities with infill development be located around rail and BRT in Goal 7.1. The Planning Board, however, removed the transit element.²⁶ The current draft recommends MMH and Complete Communities in 32 centers of activity and 11 corridors dispersed throughout the county, including some centers served by only infrequent bus service.²⁷ By adding remote centers with inadequate transit located in areas not designated for intense growth,²⁸ the Planning Board encourages more driving with more Vehicle Miles Traveled (VMTs). The General Plan should return to the recommendation for transit in the Public Hearing draft.

B. The Planning Board draft needs to establish a narrative to explain how the county will transition in the next 30 years from its current level of auto use to biking, rolling, and walking either as independent trips or as a means of getting to transit.

In these uncertain times, the Transportation chapter envisions that Montgomery County will be able to add infrastructure for biking, rolling, and walking that will encourage the use of transit, thus allowing a reduction of the current number of car lanes and the narrowing of the streets in our centers of activity to increase walkability. I welcome that outcome, but the draft plan simply jumps from the present to the Plan's desired outcome, without explaining interim steps. That needs to be done.

C. I support the Planning Board draft's recommendation that no more highways be built and would add the recommendation to remove M-83 from the Master Plan of Highways.

²⁵ http://montgomeryplanning.org/strategic_planning/centers/Framework_Report_Final.pdf Executive Staff has not been able to find a copy of the final report, or the list of properties that the report identified.

²⁶ Comments of Chair Casey Anderson at meeting with Montgomery for All members on March 25, 2021.

Montgomery for All is an organization that supports Thrive, created by Jane Lyons of Coalition for Smarter Growth.

²⁷ See the list of centers on page 31 of the Planning Board draft.

²⁸ See the Growth Areas in the schematic map on p. 31 of the Planning Board draft.

V. Parks—This new chapter²⁹ recommends that urban parks receive priority without analyzing how this recommendation squares with the 2017 Park, Recreation, and Open Space (PROS) Plan.³⁰ The General Plan should contain a recommendation that the Planning Board shall develop criteria for balancing the competing park needs in the urban areas and surrounding neighborhoods.

- A. The Planning Board draft should be revised to include a broader discussion and understanding of general park needs, not just urban parks. That discussion should include a recommendation that Parks establish and follow objective criteria for park selection.**

The Planning Board draft has no discussion of the 2017 PROS Plan and relies on the 2018 Energizing Public Spaces Functional Master Plan (EPS) as the policy basis for its recommendations. The PROS plan establishes a hierarchy of park needs based on resident surveys. In 2017 “residents ranked trails, natural space, wildlife habitat, and nature recreation as the top three (sic) priorities for parks, across a variety of demographic segments.”³¹ This, and other PROS findings, need to be rationalized with the Planning Board’s recommendation to prioritize urban parks.

The need for objective criteria for park selection is highlighted by the Planning Board’s recent approval of a dog park in the heavily used Norwood Park. The Board approved the dog park without any analysis of the impact of the dog park on the existing uses: the toddler playground, free play area, and permitted ballfields, even though under Park standards the dog park was too close to the surrounding homes.

- B. The General Plan must clearly convey that the existence and careful stewardship of park land is in no way a substitute for county-wide policies that foster sustainability and environmental resilience throughout the entire county.**

The removal of the chapter on the environment and its recommendations, and then the addition of a long discussion of Parks’ dedication to Environmental Stewardship in the new Parks chapter is confusing.³² The Parks chapter should be clarified to show that the county understands that its environmental responsibilities go far beyond taking good care of its parks. This is particularly important, because in the 1964 and 1969 Wedges and Corridors plans, before the federal government passed landmark environmental legislation, “environment” was a general word that included conservation, natural resources, and many other concepts.³³ In the 1993 Refinement, the General Plan sets out a new definition of the environment grounded in the federal legislation, and an increased understanding of the environmental context in which land use decisions are made.³⁴

- C. Finally, the Planning Board draft should delete its suggestion that “conservation-oriented parks” would be improved if there were better access in the park for bicyclists, walkers and transit users.³⁵**

Conservation parks are for the preservation of nature, and access to a conservation park is achieved with natural trails for hiking. It is contrary to principles of conservation to open these parks potentially to bike

²⁹ The Public Hearing draft did not have a chapter on Parks.

³⁰ <https://www.montgomeryparks.org/uploads/2018/06/508-2017.PROS-COMPLETE.pdf>

³¹ PROS Plan, p. 6.

³² Planning Board draft, pgs. 115, 122, 1124

³³ https://montgomeryplanning.org/community/general_plans/wedges_corridors/part1-3.pdf, p. 44

³⁴ <https://montgomeryplanning.org/planning/master-plan-list/general-plans/general-plan-refinement-goals-and-objectives-1993/> pgs. 66-68

³⁵ Planning Board draft, p. 115.

trails and pedestrian paths, and as routes for transit users. That is the function of urban parks, like the Western Grove Urban Park, with its hard surface, impervious path that encourages walking to the Friendship Heights Metro.

VI. The AHSP's zoning proposal must contain clear parameters to assure context sensitive planning, the active participation of the community, and sound planning principles.

A. Zoning changes in the R-40, 60, 90, and 200 residential zones may be done only through the master plan process, and any rezoning must be recommended in an approved and adopted master plan.

B. Where proposed zoning changes raise issues of gentrification, loss of NOAH, and/or environmental degradation, the master plan process shall include Small Area Planning (SAP).

C. Require Site Plan for infill development in both the single-family neighborhoods and the denser development in the corridors.

D. Retain compatibility standards. The concept of compatibility is a foundation of our zoning code, part of the DNA of county planning, and must be retained. Form based zoning may work well for large projects on open land where the planner has control of the relationships between all of units. It is not a substitute for compatibility for infill projects in established neighborhoods, or dense projects along our corridors.

CC: Marlene Michaelson, Executive Director, County Council
Pamela Dunn, Senior Legislative Analyst
Casey Anderson, Planning Board Chair
Natali Fani-Gonzalez, Planning Board Member
Gerald Cichy, Planning Board Member
Tina Patterson, Planning Board Member
Partap Verma, Planning Board Member
Gwen Wright, Director of Planning

Attachments: Extension Request



OFFICE OF MANAGEMENT AND BUDGET


Marc Elrich
County Executive

Jennifer Bryant
Director

M E M O R A N D U M

June 09, 2021

TO: Tom Hucker, President, County Council


FROM: Jennifer Bryant, Director, Office of Management and Budget 


SUBJECT: Extension Request: Fiscal Impact Statement for Thrive Montgomery 2050
Planning Board Draft, April 2021

As required by Section 33A-7 of the County Code, we are informing you that transmittal of the Fiscal Impact Statement for the above referenced General Plan, Thrive Montgomery 2050, will be delayed because additional time is needed to coordinate with the affected departments, collect information, and complete our analysis. We will transmit the statement no later than Friday, June 25, 2021.


JB:ps

cc: Claire Iseli, Special Assistant to the County Executive
Debbie Spielberg, Special Assistant to the County Executive
Dale Tibbitts, Special Assistant to the County Executive
Dominic Butchko, Office of the County Executive
Barry Hudson, Director, Public Information Office
Meredith Wellington, Office of the County Executive
Mary Beck, Office of Management and Budget
Pofen Salem, Office of Management and Budget
Chrissy Mireles, Office of Management and Budget


0		Team	Commenter	Document	PDF Page	Action Item	Comment
1		Policy	ADB	General	General		Most of these comments have been made at previous reviews, with the number of asterisks in the  column showing how many times these comments have been made as part of past review efforts.
2		Policy	ADB	General	General		Page numbers in these comments refer to the total PDF page numbers; not necessarily the numbers printed on each corner of each page.
3	**	Policy	ADB	Draft Plan	General		<p>The plan should more overtly establish the context within which it was developed. It includes some scattered references to COVID, Vision Zero, climate change, and social justice topics. These might be highlighted more directly as part of an introductory section so that readers in the future can have an awareness of how these topics were experienced and applied to the plan.</p> <p>Such an introduction might also call out major technological changes that have recently occurred or that are expected to occur, including recent & ongoing developments in big data & GIS analysis, ridehail, bikeshare, dockless bikes & scooters, electric bikes, electric vehicles, and telecommuting (particularly due to COVID). Upcoming technologies include Connected & Automated Vehicles.</p>
4		DO	CC	Draft Plan	General		<p>The plan seems too insular. Part of Montgomery's strength is its connections to the region as a whole – more specificity on how these connections should be reinforced or changed over the time horizon should be addressed. We rely on the region for goods, services, jobs, education, travel, etc.</p> <p>How will we stay connected, how will the world change around us? How do we take advantage of the changes (e.g. National Landing Employment Center, Growth in the Dulles Corridor, Central Maryland Defense and Intelligence Cluster)? What about access to our anchor institutions (DOE, FDA, NIST, NIH, Montgomery College, etc.)? There isn't Montgomery College 15 min from everywhere.</p>
5	****	Policy	GE, ADB	Draft Plan	34-62		This should consider where existing development capacity is available vs existing transportation capacity. Where can new development occur within existing transportation infrastructure capacity (mode-neutral)? Consider how to increase density where we can handle growth
6		Policy	ADB	Draft Plan	40		Figure 29 - Should the dots on the map be numbered to correspond to the legend?
7		Policy	ADB	Draft Plan	40		Figure 29 - Colesville is an activity center located at the junction of three growth corridors, but is shown in a "Limited Growth" area. Consider whether some component of this should change.
8		DTE-Planning	SCP	Draft Plan	41		First bullet mentions that densities should be sufficient to support provision of transit. This seems vague. What level of transit? The density to support will be different depending on the type and level. Consider being more specific about the type of transit, "high-quality, frequent transit" or "bus rapid transit" or something else.
9		Policy	ADB	Draft Plan	42		<p>1st Header - RE: "Limit growth beyond corridors to compact, infill development and redevelopment in Complete Communities to prevent sprawl"</p> <p>This sentence might benefit from rephrasing. First, it should clarify *growth* corridors. Second, it feels conflicting: we're focusing growth into growth corridors, but now it's saying to do the same kind of growth outside those corridors. Needs clarification.</p>
10		DO	DBB	Draft Plan	46		Figure 34 - Rockville metro location is hidden by the Rockville label
11		Policy	ADB	Draft Plan	54		Typo in blue text - "eality" should be "reality"


0		Team	Comment er	Document	PDF Page	Action Item	Comment
12	**	Policy	ADB	Draft Plan	55		Left Two Bullets, RE: Co-Location - This should consider not just co-location of governmental services, but also how these services might also be combined with other uses such as housing, office, and retail.
13	**	Policy	ADB	Draft Plan	58		This page includes the statement that "implementation will be primarily market driven", but the action items in this chapter are too vague as to establish any ambitious changes or advocate things that the market is unlikely to do of their own volition. Market dynamics (especially lenders) in land development tend to be conservative, rarely piloting or testing new concepts, and without stronger clarity or oomph in this document it feels likely we're going to end up with the status quo: lacking corner markets, neighborhood cafes, innovative housing, etc
14		DTE- Planning	SCP	Draft Plan	62		How are measures for transit usage (inter-county and weekend) going to be developed and assessed at the proposal stage?
15		DTE- Planning	SCP	Draft Plan	73		3rd Sub-Bullet - I support the premise of the third bullet to make streets for pedestrians, but consider also highlighting the role of transit (which can struggle to function when we make the lanes too narrow).
16		DTE- Planning	SCP	Draft Plan	73		3rd Sub-Bullet - What does "adequately accommodating automobiles" mean? This could be interpreted by different people to mean very different things.
17		Policy	ADB	Draft Plan	83		1st Bullet - "s pace" should be "space"
18	**** *	DO	CC, JMC	Draft Plan	85-94		Concerned that the plan is heavily focused on existing or potential redeveloped urban areas. The reality is we have a lot of suburban neighborhoods (cul-de-sac neighborhoods) that are probably not going to redevelop. How are we addressing their needs in this plan? The only tool I see is trying to incentivize people to telecommute, but there will still be people who need to get from these neighborhoods to work, to shopping, etc.


0		Team	Comment er	Document	PDF Page	Action Item	Comment
19	**** *	Policy	ADB	Draft Plan	85-94		<p>This should outline a more distinctive transportation vision for varying contexts, particularly lower density areas. I suggest defining the intent of shifting vehicle trips as far upstream in a trip as able. As discussed w/ MNCPPC on 6/4/2020 and has been reiterated as part of three other sets of formal comments since: consider a vision that supports the bullets below. This vision is also expressed in an accompanying document.</p> <ul style="list-style-type: none"> • Serve high-density areas (Red/Orange Policy Areas) with high-intensity transit & walking/biking access. Vehicle access within these areas would predominantly emphasize transit services. Strengthened Parking Lot Districts (PLDs) in Downtowns and Town Centers should focus on catching auto users at the periphery, enabling the interior of these areas to focus on ped/bike trips, as well as transit & potentially ADA-focused vehicular trips. Not explicitly empowering transit to these areas will restrict their regional accessibility. • Serve lower-density areas (Orange/Yellow Policy Areas) with micro-transit, bikeways, &/or Bike & Ride facilities to concentrate these areas' ridership into the higher-intensity stops along a high-intensity transit network. Not considering these areas will leave large portions of our population unaffected by the plan's vision, severely reducing the plan's ambition. • Serve lowest-density areas (Green Policy Areas) with Park & Ride facilities at regional upstream points: likely focusing on in-line facilities along interstates / major highways, but not excluding the potential for neighborhood / area-focused P&Rs. Should encourage other jurisdictions to provide out-of-County P&Rs for similarly low-density areas.
20	*	Policy	ADB	Draft Plan	85-94		The plan should establish more overt vision toward MARC and other commuter services (e.g. MTA and private commuter buses).
21	****	Policy	ADB	Draft Plan	85-94		<p>Should we be capitalizing on our Amtrak access more? Do our Amtrak stations have significant needs? Are there positions we can advocate for toward improving the Capitol Limited service? Should we be seeking to position Amtrak as a replacement option for feeder flights between local airports and airports such as EWR, PHL, and PIT, opening up more slots at them?</p> <p>Even if the plan ultimately doesn't suggest significant changes to the County's Amtrak access, it should at least acknowledge that it exists. The plan still does not even contain the word "Amtrak"</p>
22	****	Policy	ADB	Draft Plan	85-94		<p>Should this plan establish any vision for air transport within Montgomery County?</p> <p>We have one public airport (Airpark) and I believe one private airport (Davis). There is no reference to these facilities at all, nor any discussion of developing technology related to drones.</p> <p>What does the General Plan foresee these facilities serving & becoming, particularly in the plan's emphases on equity and environmental impacts?</p>


0		Team	Commenter	Document	PDF Page	Action Item	Comment
23	****	Policy/CSS	JMC	Draft Plan	85-94		<p>Plan does not seem to acknowledge the potential impacts of autonomous vehicles in the future. It this is a 30-year plan, it should at least touch on how this technology might change the transportation network and how we might plan for it.</p> <p>(ADB) This presents an opportunity to establish our position on topics such as the Trolley Problem, circulation / roaming / parking, vehicle integration & communications, applications toward ridehail / transit / freight, vehicle regulation, insurance & liability, data discovery, cybersecurity and maliciousness, legal frameworks, workforce impacts, and implementation.</p>
24		Policy/CSS	SLB	Draft Plan	85-94		<p>Most graphics and charts in this section have no citations shown. Need to show sources of data for reader to evaluate and explore further as desired.</p>
25		DO	CC, SLB	Draft Plan	86		<p>Statement about MoCo doing poorly re % of non-auto commuters is not accurate as shown by its own chart (Figure 38): "Montgomery County has among the lowest percentages of commuters in the region who walk, pedal, roll, or ride transit" - then accompanying chart (Figure 38) shows overall we are about in the middle.</p> <p>Plus that chart compares apples & oranges - compares all of the County - urban, suburban and rural - with the small very urban jurisdictions of DC, Arlington & Alexandria - while not acknowledging we are actually about in the middle and do better than most other jurisdictions in the region with more comparable development patterns - and our urban centers do comparably well to the urban areas shown.</p> <p>Also no citations shown for the chart's data.</p>
26		Policy	ADB	Draft Plan	86		Figure 38 - What does the orange dotted line signify?
27		DTE-Planning	SCP	Draft Plan	87-88		<p>Transportation write-up seems to mention transit sparingly with a greater focus on walking, biking, and rolling. Transit seems to be desired but doesn't seem to get the same focus. Any reason?</p>
28		DO	DBB	Draft Plan	87		<p>The plan mentions the short-comings of the radial pattern of corridor development. Yet, this plan doubles-down on the "corridor centric" planning approach, with the addition of very moderate density increases for housing. How will the street-grid be created without impacting parks, streams, and open spaces? It would be helpful if examples were provided of places where this can and should be done.</p>
29		Policy	ADB	Draft Plan	87		Figure 40 - Show National Airport (and perhaps also Gaithersburg Airpark) as airports.
30		Policy	ADB	Draft Plan	87		Figure 40 - Given the figure's focus on regional connectivity: consider adding Amtrak stations as well as major intercity bus locations.


0		Team	Comment er	Document	PDF Page	Action Item	Comment
31	**	Policy	ADB	Draft Plan	89		<p>Walk/Bike/Roll Network, 2nd Bullet, "Stop planning or constructing new highways or major road widenings for cars."</p> <p>How is this intended to apply to projects such as Montrose Parkway, M-83 to Clarksburg, and the extension of M-83 to the ICC?</p> <p>If it is intended that these projects be immediately stopped without analysis or other consideration of local impacts: that should be more explicitly stated so that communities can be aware.</p> <p>If it is intended that the projects could go forward but be reconsidered individually, perhaps rephrase this line in the Plan as something like "Stop planning or constructing new highways or major road widenings for cars beyond those already in development, which may be reconsidered individually in this same context."</p>
32		DTE- Planning	SCP	Draft Plan	89		<p>Walk/Bike/Roll Network, 2nd Bullet, "Stop planning or constructing new highways..."</p> <p>How do roadways like Observation Drive fit into this vision? They are needed to make the CCT or expanded 355 BRT function.</p>
33	**	Policy	ADB	Draft Plan	89		<p>Walk/Bike/Roll Network - Consider an additional bullet encouraging development of weighted travel time metrics for bicycle and pedestrian travel. These might use Bike Level of Traffic Stress (LTS) and Ped Level of Comfort (PLOC) methodologies.</p> <p>An example, borrowing LOS parlance: an activated comfortable sidewalk with an LOS A might treat a 5 minute walk as 5 minutes, but a spartan worn path of LOS F might treat a 5 minute walk as 20 minutes. This could feed into travel time isochrones, accessibility to transit or Complete Communities services, and it could feed into other performance metrics. Such isochrones would be a companion to driving & transit isochrones as like what is shown in Figure 42.</p>
34		Policy	ADB	Draft Plan	89		Transit System, 1st Bullet - This is a very simplistic statement that gives no overarching vision. (see my earlier & very long comment on pages 85-94 for more detail on what this should identify)
35		DTE- Planning	SCP	Draft Plan	89		Transit System, 2nd Bullet - Why can only general purpose lanes be converted to dedicated transit lanes? What about parking?
36		Policy	ADB	Draft Plan	89		<p>Transit System, 3rd Bullet - Consider defining "all-day" ... is this meant to include the peak periods *and midday* service periods? Or is this intended to mean 24/7 service that includes overnights and weekends?</p> <p>The latter is of course better for the spirit of this issue & the plan generally, but it would have major cost implications.</p>
37		Policy	ADB	Draft Plan	89		Transit System - Consider an additional bullet suggesting that the County pursue state-of-the-art transit technology, such as those relating to energy systems and Connected & Automated Vehicles.
38	****	Policy	ADB	Draft Plan	89		Driving Alone – Consider an additional bullet addressing Connected and Automated Vehicles


0		Team	Commenter	Document	PDF Page	Action Item	Comment
39	***	Policy	ADB	Draft Plan	89		<p>Driving Alone, 3rd Bullet - Encouraging the proliferation of drive-alone vehicles appears to be in stark contrast to the rest of the plan. EVs are still vehicles. They presently remain powered largely by polluting sources, are very polluting in their production and end-of-life waste, and still demand large swaths of highly polluting concrete and asphalt pavements.</p> <p>Given the spirit of the rest of the plan, a better bullet here might be to increase the share of EVs as a proportion of the overall vehicle fleet, with the goal of nonetheless reducing the net number of vehicles, and leading in the development of EVs through their implementation as part of government vehicle fleets.</p>
40		DTE-Planning	SCP	Draft Plan	89		Driving Alone, 3rd Bullet - Who is responsible for providing the appropriate infrastructure for non-polluting vehicles?
41		DTE-Planning	SCP	Draft Plan	89		Driving Alone - Why is there no mention of eliminating or revisiting parking minimums as an approach to addressing parking?
42		DTE-Planning	SCP	Draft Plan	91		1st Sentence - Need to update the reference to "XX"
43		DTE-Planning	SCP	Draft Plan	91		1st Paragraph, Last Sentence - Transit can incentivize development but not without appropriate land use controls and codes. The two need to work together to create this vision
44		DO	DBB	Draft Plan	91		<p>Right Side Paragraph - "A quick trip to the grocery should be manageable on foot, while a visit to another town might require a trip by car, train, or even airplane."</p> <p>This sentence has a lot of problems. The mention of "town" seems out of place here. We rarely talk about "towns" in this part of the country. I don't usually think of taking an airplane to a town. Why isn't transit in this paragraph?</p>
45		DTE-Planning	SCP	Draft Plan	93		How should we make sure that inexpensive housing is not located in areas or built at densities that make delivering frequent, high-quality transit challenging?
46		DTE-Planning	SCP	Draft Plan	94		Do we know for certain that we can reduce the miles of auto travel lanes while expanding the grid? I get the intent just want to make sure this is achievable.
47		Policy	ADB	Draft Plan	94		Why "Miles of auto travel lanes *per capita*" instead of just net miles of auto travel lanes?
48		DTE-Planning	SCP	Draft Plan	94		Why do the measures have a qualifier (up/down) in this section, but most other sections do not?
49		Policy/CSS	SLB	Draft Plan	88,93		<p>Inconsistent or unclear policies & statements about building new roads.</p> <p>p88 - Multiple statements RE: need new roads for denser street grids, but no new roads should be built for cars. Need criteria for when each of the policies should be implemented.</p> <p>p93 - Need to build finer-grained street grid. "...a more connected street grid is perhaps the single most important step to make our streets safer and more attractive and reconnect communities divided by overbuilt highways. For this reason, the addition of local street connections should be a top priority in both capital budgets and development review."</p>

0		Team	Comment er	Document	PDF Page	Action Item	Comment
50		DO	DBB	Draft Plan	94		What's the purpose of Figure 46? Why comparing bus to bicycle; shouldn't it be bicycle vs auto, which is more in line with the accompanying text? Figure 43 shows Transit trips as being between 4 - 15 miles. Why show a two mile bus trip here?
51		DTE- Planning	SCP	Draft Plan	111-112		How will increasing residential density/supply be handled along corridors that have high numbers of single family housing? This is the case along a number of the BRT corridors.
52		Policy/CSS	SLB	Action List	General		Given the detail and more operational considerations: this document should be adopted as a separate document - one that is updated on a regular basis, rather than a document intended to guide land use and related policies for the next 20 - 30 years.
53		DO	CC, SLB	Action List	General		These Action Lists seem to be poorly organized and contain many overlapping or redundant statements of proposed Actions. The listings should be reformatted to better group the action items & improve readability, helping ensure these action items are not overlooked.
54		Policy/CSS	SLB	Action List	General		Stormwater management actions are scattered among several different Action sections with a great number of redundancies.
55	****	Policy	ADB	Action List	General		<p>There does not appear to be any unified language in these actions toward efforts toward reducing pollution. Such language might reiterate the interest in reducing the use of polluting vehicles, reducing the need for asphalt & concrete to serve large numbers of vehicles, and addressing the production and scrap/recycling of said vehicles. It might also focus on fueling facilities, particularly those focused on fossil fuels, perhaps limiting the circumstances under which they might be implemented.</p> <p>Such a section should also address energy production & distribution, as well as waste management. It should address agricultural, industrial, commercial, and residential pollution practices & identify needs & responses to each.</p> <p>Consider something like a Pollution Functional Plan</p>
56		Policy	ADB	Action List	1		The cover page is absolutely ginormous. Need to shrink it down to a normal page size.
57		Policy/CSS	SLB	Action List	2		<p>2nd Paragraph - RE: "The actions listed here focus primarily on subjects under the authority of the Planning and Parks Departments"</p> <p>This is not accurate, as many of the action items in this document are beyond the authority of these Departments.</p> <p>(ADB) - Consider rephrasing this sentence as something like "The actions listed here focus primarily on subjects under the authority of the Planning and Parks Departments, or within these departments' abilities to be a stakeholder in affecting."</p>
58	**	Policy	ADB	Action List	3-7	G, C	<p>An action item in G or C might be to perform periodic evaluations of regional development procedures, policies, regulations, incentives, etc. to compare the process, time, and costs associated with redevelopment in the region's various jurisdictions.</p> <p>This could better shape how and where we are lagging or deficient, and where we can best target improvements to our processes & regulations.</p>


0		Team	Commenter	Document	PDF Page	Action Item	Comment
59		Policy	GE	Action List	3	G-2	What happens to areawide master plans and functional master plans? This only references corridor-focused master plans.
60		Policy	GE	Action List	3	G-4	This means that the Climate Action Plan will take precedence over conflicting positions with THRIVE or other master plans.
61		Policy/CSS	SLB	Action List	3	G-4	G-4 should be an overall Action with G-5 thru G-8 (plus several others scattered throughout) as subactions. Grouping actions together like this will improve readability, and help ensure that these action items are not overlooked.
62		Policy	GE	Action List	3	G-8	This recommendation is only to create/choose tools; no requirements to incorporate tools/metrics into the Growth & Infrastructure Policy (or other policies)
63		Policy	GE	Action List	4	G-10	This should only apply to development review and mandatory referrals and not to public infrastructure design and operation.
64		Policy	ADB	Action List	4	G-10	<p>If this is intended to also apply to public infrastructure: this lighting statement would imply that not providing any lighting at all is the best solution.</p> <p>Consider amending this to include why we *do* provide lighting: safety, visibility, and as a component of activating spaces & creating senses of place.</p>
65		Policy	GE	Action List	4	G-19	Why is Thrive silent on the need to provide multimodal access to parks and recreational facilities managed by MNCPPC? This should be addressed in Thrive and it does reflect equity, environment and economic development goals.
66		Policy/CSS	SLB	Action List		G-24 - G-31	These all pertain primarily to the Ag Reserve and should be grouped together as a single action with multiple sub-actions. Grouping actions together like this will improve readability, and help ensure that these action items are not overlooked.
67		Policy	GE	Action List	5	G-26	Include analyzing public transit and multimodal access to agricultural reserve.
68	**	Policy	ADB	Action List	6	C-2	<p>As the plan acknowledges: 15 minute communities may not apply everywhere. However, Thrive appears to have backed off this concept, when I feel that it should instead be better strengthening it. Thrive should identify the core variables that area master plans would then define and apply:</p> <ul style="list-style-type: none"> - Travel Time - Perhaps 15 minutes off-peak in Red areas, vs 30 minutes peak in Green areas - Travel Mode - Perhaps by ped/bike in Red areas, vs any mode in Green areas - Destination - Frequent uses might need to be within a shorter travel time & non-auto modes, and rare or highly centralized uses might allow longer travel times. <p>The "Complete Communities" tab in this spreadsheet includes some potential variations of travel time/mode.</p> <p>Frequent destinations might include parks, civic/rec centers / libraries, grocery stores, pharmacies, elementary schools, high-intensity transit stops, and hardware stores.</p> <p>Less frequent or more centralized services might include middle schools, Regional Service Centers.</p> <p>Highly centralized or rare-but-important services might include high schools or hospitals.</p>

0		Team	Commenter	Document	PDF Page	Action Item	Comment
69		Policy/CSS	SLB	Action List	8	D-6	"Update the county's road code standards to align with the Complete Streets Design Guidelines." Should be referenced in the Transportation section.
70		Policy	GE	Action List	9	D-16	Include public access and transportation to facilities and programs to support equity and zero car households.
71		Policy/CSS	SLB	Action List	9	D-16	How does this go about creating a comprehensive Calendar of Events for programming across agencies & non-governmental non-profits for multiple sites and applications belong in a General Plan? (ADB) Consider generalizing by adjusting the phrasing like "...improve the reach of diverse programming, such as through creating and maintaining an annual consolidated..."
72		Policy/CSS	SLB, JMC	Action List	10	T-1	Add a reference to the Countywide Transit Corridors Functional Master Plan.
73	**	Policy	GE	Action List	10	T-2	Removal or changes to master-planned but unbuilt roadways must only follow from a comprehensive examination of the transportation, mobility, access, safety, and climate impacts and coordination with MCDOT and MDOT. If the transportation plan is being changed, the land use plan will also need to be changed.
74	***	DO, DTE	CC, GE, DB, JC, SLB, SCP	Action List	10	T-2	Delete "upgrade transitways to median-running". We agree that median-running is a preference, but this is an operational consideration beyond the scope of this plan. We require flexibility in transitway design and placement, and median running is not always the best/appropriate option.
75		Policy/CSS	SLB	Action List	10	T-3	Why develop a plan to reduce access points for *all* access modes? The spirit of the plan is largely on increasing access for non-auto modes, and this action item should reflect that.
76		Policy	JMC, ADB	Action List	10	T-3	(JMC) How is the plan proposing that a street grid network and alley network to be developed? Where? Just in certain areas that are more urban? (ADB) Does the plan envision that private development will build out these grids, as has been intended with most recent master plans? Or that we would have White Flint style CIPs implementing these grids?
77		DTE- Planning, Policy	SCP, ADB	Action List	10	T-4	In developing the scope for an Aging Readiness plan it will be important to consider what is expected of the plan, considering under Complete Streets and its ongoing efforts: our systems are already intended to be designed to be convenient and accessible to all users. Such a plan could potentially be more of a land use plan that might as well fall under the Complete Communities category.
78		Policy	ADB	Action List	10	T-5	Be mindful that this item is particularly operational in nature & should be led by MCDOT.
79		Policy/CSS	SLB	Action List	10	T-5	Curbside management plan "to provide reliable access" - add the phrase "by all modes"...
80		Policy/CSS	SLB	Action List	10	T-6	This action item should cite Vision Zero
81		DTE- Planning	SCP	Action List	10	T-8	Who are these guidelines for? Ultimately Council sets the priorities by adopting the CIP budget. I think anything that can help guide us in identifying project priorities is great just want to make sure it is feasible and directed to the folks who control the budget.
82		DTE- Planning	SCP	Action List	11	T-12	Another consideration is the types of stormwater management facilities allowed/accepted. MCDOT is struggling to get BRT projects along state roadways approved from a SWM perspective because of the limited number of facility types they are willing to accept and maintain.

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83		Policy, DTE	CC, GE, SLB, JMC, SCP, ADB	Action List	11	T-16, T-18	<p>The main body of Thrive doesn't appear to have any narrative that makes a case for these actions. What is the purpose of these recommendations & roles of the transit authority or WSTC?</p> <p>Each of these must be studied prior to acting upon; we do not presently know that these are good ideas such that they should be written into these action items as things we shall do.</p> <p>Be mindful that giving non-County agencies a stronger role in transportation planning could potentially run counter to many of the plan's visions.</p>
84		Policy/CSS	SLB	Action List	11	T-16 thru T-20	Group T-16, T-17, T-19, T-20 together under a single Transit action with these bullets as sub-actions. Also be mindful that many of these bullets are not within M-NCPPC authority.
85		Policy	GE	Action List	11	T-17	This will be done with a Ride On route redesign study that is in scoping and procurement and will be coordinated with WMATA's Bus Redesign Study effort.
86	**	Policy	GE	Action List	11	T-17	Need to ensure this recognizes the need for bus depots & transit centers (particularly in locating & acquiring ROW). This should establish that a future Transit Functional Plan will identify these locations, for inclusion into future area master plans.
87	**** *	Policy	ADB	Action List	11	T-17	Need to ensure this recognizes the need for park & ride facilities, particularly in more rural areas (Green and some Yellow policy areas). These would be important for a future Transit Functional Plan to consider and identify locations for, and integral toward getting travelers into a high-intensity transit system as far upstream as feasible.
88		DTE- Planning	SCP	Action List	11	T-19	<p>(SCP) I support expansion of commuter rail but want to make sure we don't try and turn MARC into Metro or the Purple Line. Appropriate station spacing is critical to MARC's success.</p> <p>(ADB) Efforts to expand MARC service by adding new stations must overtly address low-ridership stations. The plan should mention these & put the public on alert so that they can be better aware and informed should those efforts begin in earnest.</p> <p>(GE) Expansion of MARC must also consider technical feasibility.</p>
89	**	Policy	ADB	Action List	11	T-19	Consider expanding this action item with a suggestion that the Brunswick Line be considered for through-running into Virginia, or onto other Maryland lines (such as the Penn and Camden), and for maintaining service into West Virginia. Not saying all of this will or needs to happen; just opening the door that it be considered.
90		Policy	GE	Action List	11	T-20	<p>This is a new concept; where did it come from? It is not part of Corridor Forward Study.</p> <p>(ADB) As written it appears to imply it *will* be heavy rail. I think the intent is that you want to ensure it could provide for heavy rail, just in case? With that in mind: consider phrasing perhaps as "that can accommodate up to heavy rail"</p>
91		Policy/CSS	SLB	Action List	11	T-21 thru T-23	Group T-21, T-22, and T-23 together under a single Parking action with these bullets as sub-actions. Also be mindful that many of these bullets are not within M-NCPPC authority.

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92	**	Policy	ADB	Action List	11	T-21	<p>Be mindful that reducing parking also reduces the on-site special parking such as that of ADA spaces, EV charging spaces, carshare spaces, motorcycle spaces, etc. Consider expanding this action to recognize these special parking needs and that they should be considered as part of the elimination of minimums.</p> <p>Based on these impacts to EVs: consider grouping this in with the Zero Emission Fueling action (T-24)</p> <p>As provision of these spaces might become more important to account for within public rights-of-way: consider grouping this in with the Curbside Management action (T-5) as sub-bullets within a single overarching action.</p>
93		Policy	ADB	Action List	11	T-22, T-23	<p>These appear to be very similar actions & can probably be combined.</p> <p>T-22 should also be clarified a bit as to what this means, which I think is suggesting that parking be market-priced (instead of its tending to be arbitrarily cheap).</p>
94		DTE- Planning	SCP	Action List	11	T-22	<p>This seems limited. What about demand-based pricing or other schemes that better balance parking needs. I worry that if the focus is just on the market and the market doesn't support much then we are still struggling to implement the vision.</p>
95	**	Policy	ADB	Action List	11	T-24	<p>Per the comment on T-21: be mindful that reduced parking requirements will also result in reduced provisions for EV charging spaces.</p>
96	***	Policy	ADB	Action List	11	T-24 thru T-26	<p>Be mindful of how Zero Emission / Electric Vehicles are referenced, as EVs are still vehicles. They presently remain powered largely by polluting sources, are very polluting in their production and end-of-life waste, still demand large swaths of highly polluting concrete and asphalt pavements, and are still vehicles capable of deadly force in event of collision.</p>
97	****	Policy	ADB	Action List	11	T-24 thru T-26	<p>I don't recall seeing significant and focused narrative toward power generation, which is an important environmental consideration as well as cost impact (and subsequently: equity impact) on both residents and businesses. This is also a component of the environmental impact of electric vehicles.</p> <p>There were a few scattered mentions of finding places for renewable energy production, but there does not appear to be any clear and cohesive vision established by this plan.</p>
98	****	Policy	ADB	Action List	11	T-24 thru T-26	<p>I don't recall seeing any narrative at all toward waste management, other than the limited focus of action G-28. Waste management is an important environmental consideration as well as cost impact (and subsequently: equity impact) on both residents and businesses. Earlier drafts of Thrive included action items focused on reducing waste through reduced generation, as well as increased resource reuse, recycling, and composting. These seemed like good ideas that should be included in the plan.</p> <p>This is also a component of the environmental impact of electric vehicles (and their batteries), particularly in their end-of-life recycling, reprocessing, and discarding of non-reusable components. But it also extends more generally to all vehicles (scrap, tires, batteries, etc) and the collection and processing of more conventional waste.</p> <p>Consider a Waste Management Functional Plan (or this might be a part of a Pollution Functional Plan, or perhaps an Energy Functional Plan)</p>

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99	**	DTE	DS	Action List	11-12	T	Consider a Policy that advises agencies (likely DPS, DEP, DOT, and MNCPPC) to coordinate on improving drainage needs. One such approach that has previously been recommended is lot-to-lot drainage evaluation and issues. The approach puts the onus on the designer to look at downstream impacts. An emphasis on low spots and critical junctures in design should be emphasized.
100	****	Policy	ADB	Action List	11-12	T	<p>Consider an action which addresses freight movement, and perhaps suggests a Freight Functional Plan. Such an effort might address:</p> <ul style="list-style-type: none"> - Regional shipping patterns & opportunities for improvement - Effects of shipping costs on goods & services - Truck sizing in varying land use areas - Short-turnaround deliveries (USPS, UPS, FedEx, Ubereats, Doordash, Grubhub, etc) - Loading bay requirements, access management, use of alleys, curbside management - Urban Consolidation Centers - Bike-based freight movement
101	****	Policy	ADB	Action List	11-12	T	<p>Recognizing that the County's direct influence is limited, consider nonetheless including position statements toward vehicle regulation as it applies toward ped/bike collision requirements, speed governors, &/or Automated Vehicle regulation.</p> <p>(I recognize feedback from MNCPPC that staff are under direction not to address topics such as this. However, I continue to believe it is something that could be beneficial to the plan)</p>
102	****	Policy	ADB	Action List	11-12	T	<p>Recognizing that the County's direct influence is limited, consider nonetheless including position statements toward driver licensing as it applies toward update drivers' ed & testing curriculums to include new technology, and also license retesting.</p> <p>(I recognize feedback from MNCPPC that staff are under direction not to address topics such as this. However, I continue to believe it is something that could be beneficial to the plan)</p>
103	**	Policy	ADB	Action List	11-12	T	<p>Consider including an Action that supports the use of policies and engineering to reduce the number of situations whereby enforcement may be necessary. Where enforcement is necessary, a preference should be given toward the use of automated enforcement.</p> <p>This is to reduce the risk of interactions between the public and law enforcement, reducing the risk of escalation and affecting inequities in law enforcement. Must be mindful, however, that automated enforcement must itself still be implemented with consideration of equity impacts.</p> <p>Such an action might also open the door to identifying inequities in the manner in which traffic penalties are assessed, both in demographic bias as well as how regressive fines disproportionately harm low-income populations.</p>
104	****	Policy	ADB	Action List	11-12	T	Consider including an Action that calls for developing resources for the public to better understand housing + transportation costs (both financial and time-based), tallied together, in making personal life decisions.

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105	****	Policy	ADB	Action List	11-12	T	Consider including an Action that suggests expanded educational & outreach programs. Could also include traffic gardens/playgrounds, as well as safety & bike maintenance curriculums in schools. (I recognize feedback from MNCPPC that staff are under direction not to address topics such as this. However, I continue to believe it is something that could be beneficial to the plan. Action D-20 sets a precedent of suggesting such effects on school curricula)
106		Policy/CSS	SLB	Action List	15	P-12	"Work with transportation agencies to provide bus routes to increase transit access to parks." This should be "to increase multi-modal access to parks, including transit, biking, scootering and walking." Why is this not included in the Transportation Actions section? Given there is so much redundancy in so many of these Actions seems like this is one where it DOES belong in both!

Travel Time	Frequent	Occasional	Infrequently	Rare
Red	15 non-auto	20 non-auto	30 non-auto	45 non-auto
Orange	20 non-auto	30 non-auto	30 any mode	45 any mode
Yellow	30 non-auto	30 any mode	45 any mode	60 any mode
Green	30 any mode	45 any mode	60 any mode	None