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Civic Federation Testimony to County Council on Wheaton CBD & Vicinity Sector Plan

I am Jim Humphrey, representing the Montgomery County Civic Federation as Chair of their Planning and Land Use Committee. The following comments were approved for transmittal to Council by majority vote of our Executive Committee members.

We are pleased that the Plan's "Community Facilities" section contains a discussion of public schools (Plan, pg. 79). We strongly support the Plan recommendation to: "Retain the County-owned former elementary school building and site on Upton Drive, currently used by the Crossways (sic) Community, for a future elementary school if needed." The text also notes "The Plan's estimated residential development could yield up to 386 elementary school students." So it is fairly certain that this facility, the former Pleasant View Elementary School, will be needed in future as a traditional neighborhood public elementary school.

The Federation is also committed to protecting existing residential neighborhoods and preserving the quality of life for residents, whether those neighborhoods are located within a sector plan area or not. We have serious concerns, therefore, about the Plan recommendations to rezone existing R-20, R-30 and R-60 residential properties in the Sector Plan area to the CR or CR Neighborhood Zones (Plan, pp. 45, 46, 50, 52 and 53), especially given the uncertainty as to whether the as-yet-to-be-approved CRN Zone will contain adequate safeguards to protect nearby properties remaining in single-family residential use.

Getting down to particulars, there are some specific changes we feel would help:

- We believe the hand-drawn map used repeatedly in the Plan (pp. 18, 19, 24, 26, 28, 29, 30, 34, 35, 36, 37, 38 and 39) should be replaced with a more detailed and precise map. For example, "Map 17 Districts" (Plan, pg. 39) lacks the detail to make it useful, and should be replaced with the map found on page 6 of the *Draft Design Guidelines*.
- We then suggest the section entitled "Existing Neighborhoods Surrounding the Districts" (Plan, pg. 55) reference this map on page 39, so that readers will know the neighborhoods being discussed.

- We recommend that the "proposed zoning" map for the Westfield District (Plan, pg. 49) should include the salmon and turquoise colors to signify intent to retain C-2 and C-T zoning for Parcels 3 and 10.

- We strongly urge deletion of the recommendation that "Houses located within the existing residential neighborhoods surrounding Wheaton's downtown should be considered for accessory apartments." (Plan, pg. 55) Specific areas should not be targeted for these units in master and sector plans. Similarly, we think the recommendation prior to this (also on page 55) should not advocate special exception application for commercial use, but instead should read: "If single-family houses along Georgia Avenue north of Blueridge Avenue are granted office use by special exception, the driveways and parking should not be enlarged and the structures should retain a residential character."

On a general note, the MCCF has repeatedly expressed our concern to Council about the uncertainty that results from use of CR zoning when calculating number of new dwelling units and jobs which could be created in an area. This in turn impairs the county's ability to do accurate long-range infrastructure planning to accommodate growth. The Wheaton Plan estimates an additional 4,600 housing units and 3,000 jobs could be created above the existing numbers (Plan, pg. 10), but given that most of the land area in the five districts will have flexible CR zoning (Plan, pg. 38) we believe this projection is no more than a wild guess. Using current CR zoning, the county must wait until a property's Preliminary Plan is approved by the Planning Board before knowing how much commercial space and how many housing units will be built on that property, and can only then calculate whether or not adequate public facilities will be available to support the allowed density and use. This is too late!

We strongly believe that planning for adequate public facilities must be able to be done at the master planning stage, and not begin at the development approval stage by rushing things into the six year CIP in response to projects that might be built and occupied within three to four years.

Finally, we have reviewed the *Draft Design Guidelines* proposed to accompany this Plan (just released to the public last Thursday, July 14, at 3:00 p.m.). We find them to be so vague and general as to be virtually useless in offering guidance specific to this Sector Plan. Repeated assurances to area residents that site-specific guidance would be included in the *Design Guidelines* have not been met. There is none of the specificity in the Wheaton guidelines that we find in those for Germantown, Twinbrook, Great Seneca Science Corridor, White Flint or even those proposed for the Takoma/Langley Crossroads area.

We again urge the Council to direct the Planning Department to save staff time by writing a single comprehensive set of *County Design Guidelines*, with a section each for high density urban areas, medium density suburban areas, and low density rural areas. And we recommend that any text discussing site-specific guidelines should then be placed in the respective master or sector plan. Thank you.