Breathing Life into the East County is Ill Considered in Thrive Montgomery 2050

The Planning Board's draft Thrive Montgomery 2050 (Thrive 2050) expresses concern about the eastern part of Montgomery County.

There are three general issues: (1) are Thrive 2050's characterizations and history of the East County full, fair and balanced; (2) is Thrive 2050's prescription for the East County likely to solve the actual problems; and (3) what adverse effects/negative consequences may flow from the medicine the planners prescribe for the East County's growth areas and elsewhere?

First, the East County cannot be described in a handful of paragraphs, nor will these comments attempt to do so. As Councilmember Navarro has in effect said there are many nice neighborhoods and people in that area. Some residents would like to see more and better jobs and investments in affordable housing, and fairly so. Thrive 2050 draws a dichotomy between investment in the East County and West County. Thrive 2050 notes that planning efforts disregarded and ultimately removed the growth corridor along Route 29 and I-95 in the eastern portion of the county. Corridors other than the I-270 corridor – including Georgia Avenue, where Metrorail's Red Line was built – were largely left behind per Thrive 2050 (p. 28). It is questionable whether some of Thrive 2050's description tells a complete and balanced story, as both West County and East County had and have major road corridors (State route 355 vs. Georgia Ave./650 New Hampshire Ave. /29 Colesville Road -Columbia Pike, etc.) and both have metrorail stops, although the western county has more, and both general areas have been fully represented in the County Council. Market economy forces have been major factors in development to date. A recent article in the Washington Post, "Connected DMV takes on area's east-west divide," (June 7, 2021) notes that the regional east-west divide issue is not new, was addressed in a Brookings Institute report dating to 1999 and is addressed in a recent "Regional Economic Development Strategy." But the article does not mention Thrive 2050's growth corridor theory. The Planning Board draft conveniently ignores that a lot of money has been pumped into Silver Spring but it isn't doing particularly well in some respects and planning staff individually have lamented the fact that desired investment, sometimes limited by market demand, has lagged at Forest Glen, Wheaton and Glenmont, even though zoning allowed for it. The point at this juncture is that the problems/issues are far more complex and stubborn than described in Thrive 2050 and zoning does not necessarily bring desired investment.

Second, Thrive 2050 says that identification of growth corridors in the East County – particularly along Route 29 and the Georgia Avenue corridor along Metrorail's Red Line – is vital to reversing decades of disinvestment and ensuring that the benefits of growth are more equitably distributed. But there are substantial questions whether this will ensure that the desired results come about. Thrive 2050 offers a simplistic, conclusory statement to support its view: "By focusing investment and encouraging development along corridors in the East County, this plan will establish the foundation for Complete Communities that will create a more prosperous and equitable future in this area." p. 36. This contains wishful thinking based

in part on the perceived theoretical force of Thrive 2050's call for corridors and complete communities, and the strength of "focusing" and "encouraging" – terms used in Thrive. The conclusion is a leap of faith, not justified in Thrive 2050. At the same time, historical development shortfalls in Silver Spring and White Oak and the regional east-west divide noted in the Washington Post article cited above, which are prologue in looking to 2050, and the underlying reasons, are ignored. There is no mention of the East County in the Complete Communities chapter and little after that (based on a word search). The County Council will do a significant disservice to the present and future residents of the East County if it simply endorses what Thrive 2050 advocates for the East County. In any event, *if* based on full and proper consideration, focusing investment and encouraging development along corridors in the East County will make a significant improvement – make it, with the addition of considerable detail, a part of (but certainly not all of) the revised general plan as it applies to the East County.

Third, and importantly, a huge potential problem is that the housing changes that follow Thrive 2050, in the East County growth zones and elsewhere, likely will be a give-away to developers as their profit motive produces higher priced development on properties where low- and moderate-income residents live and turns the upgraded property over to people with higher incomes.

Developers will buy properties, develop them into multiple residential units that have relatively high prices and sell or rent them. People will be displaced/driven out. The new units will be priced beyond what existing residents can afford. The result will be gentrification, a well-known economic-social phenomenon.

Thrive 2050 devotes little to assurance of the continued existence of market-rate affordable housing, be it rental or owned, although it very vaguely mentions refining regulatory tools. p. 101. Elsewhere, in sector plans adopted by the County Council, it has been very important to consider preservation of market-rate affordable housing in neighborhood-specific detail:

The recently approved Forest Glen/Montgomery Hills Sector Plan said in part (p. 58):

This plan aims to balance the preservation of existing market-rate affordable housing with the production of new housing, including MPDUs. This preservation and production strategy seeks to retain the existing zoning on most of the single-unit properties, and rezone select multiunit properties near existing transit stations.

The Glenmont Sector Plan said in part (p. 15):

Glenmont is known as a housing resource with a variety of housing options including multifamily condominiums and rental apartment units, many of which are considered market affordable. Market affordable units are not part of a County, State, or federal affordable housing subsidy program, but have generally lower rents than comparable units in other locations in the County, particularly when compared to new construction. While the area's single-family houses and condominiums are not recommended for change and therefore would be preserved in the foreseeable future, the three multifamily garden apartment complexes could be redeveloped, decreasing the area's market affordable units.

And, the Wheaton CBD and Vicinity Sector Plan said in part (p. 25):

New development should

• provide a housing mix that includes moderate-income housing, workforce housing, and live-work units such as artist studio

To preserve market-rate affordable housing, it is necessary to adopt any appropriate zoning changes ONLY on a block or neighborhood basis, similar to the Forest Glen sector plan, above, and NOT by a sweeping ZTA.

There are numerous problems beyond the displacement of residents. The following includes problems in Thrive 2050 and in the Planning Department's Attainable Housing Strategies Initiative. They are highly related as much of Thrive 2050 involves, directly and indirectly, housing. Both involve Missing Middle and other multifamily housing. Some problems:

- The Planning Board initiatives will produce market rate housing, not affordable housing. There is no requirement that that the "attainable housing" be affordable – these units will sell or rent at market rates.

- This will be a windfall for developers, as they pick the most profitable ventures, not the ones that would do the residents the most or any good. The East County has faced difficulties from under investment. Underlying this, there have been actors and those who failed to act. Developers have been a part of the problem. Developers, in their own financial self-interest, have not invested in the East County. Now, the proposed revised general plan and emerging Attainable Housing Strategies Initiative would in effect turn to developers for implementation. The developers will once again do what is best for their bottom lines. It's the fox running the hen house.

One thing developers like is to avoid public input. In the absence of public input, they have opportunities to do what they want at a faster pace. They can also move faster if they can take a design they choose and build it, regardless of whether it fits the local neighborhood or not. The Planners' proposals are a developer's dream in many respects. Developers could locate duplexes, triplexes, town houses and apartment buildings in residential neighborhoods. The program suffers from the following problems:

- Does not include a process requiring significant community input and participation for multifamily buildings in residential zones. Does not include site plan review and approval by the Planning Board.

- Does not require that the housing be served by adequate public services and facilities including schools, public roads, stormwater drainage, sanitary sewer capacity and water.

- Does not require that the housing meet compatibility standards for various uses in residential neighborhoods including single-family neighborhoods.

- Does not require that the housing be harmonious and consistent with the character of the surrounding neighborhood.

INSTEAD, the developer could build a multifamily structure "as a matter of right" if that housing matches an example in a "pattern book like document" (which does not yet exist) regarding general massing, orientation, scale and parking (no mention of architectural design criteria tailored to individual communities) without notice to or input from the affected neighborhood.

In addition, does not require review of whether there already is insufficient parking in the vicinity of the project and does not require sufficient on-site parking for new multifamily buildings which results in increased street parking. Does not address charging of electric cars.

In addition, in the aggregate, the addition of considerable amounts of housing can and will produce:

- Overcrowded schools
- Overcrowded libraries
- Overcrowded parks
- Loss of Green and Open Space
- Disputes and aggravation over parking spaces in the context of too few spaces
- Increased traffic on neighborhood streets
- Higher taxes to pay for additional public services and facilities

A site-specific review mechanism, with significant input from local residents, that considers the circumstances and facts is needed.

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