Thrive Montgomery 2050/Citizen comments and language

Naomi Spinrad <nspinrad@gmail.com>   Sun, Dec 19, 2021 at 7:44 PM
To: councilmember.albornoz@montgomerycountymd.gov, "Friedson's Office, Councilmember"
<councilmember.friedson@montgomerycountymd.gov>, "Hucker's Office, Councilmember"
<councilmember.hucker@montgomerycountymd.gov>, councilmember.glass@montgomerycountymd.gov,
councilmember.jawando@montgomerycountymd.gov, councilmember.katz@montgomerycountymd.gov, Nancy Navarro
<councilmember.navarro@montgomerycountymd.gov>, councilmember.rice@montgomerycountymd.gov, Councilmember
Riemer's Office <councilmember.riemer@montgomerycountymd.gov>, county.council@montgomerycountymd.gov,
"Michaelson, Marlene" <Marlene.Michaelson@montgomerycountymd.gov>, "Dunn, Pamela"
<Pamela.dunn@montgomerycountymd.gov>, linda.mcmillan@montgomerycountymd.gov
Cc: Amanda Farber <amandafarber@hotmail.com>, Cheryl Gannon <gannon1507@gmail.com>, Joyce Gwadz
<jtgwadz@gmail.com>, Dedun Ingram <idedun@gmail.com>, Naomi Spinrad <nspinrad@gmail.com>

Dear Council President Albornoz, Council Vice President Glass, Councilmember Friedson, Councilmember Hucker,
Councilmember Jawando, Councilmember Katz, Councilmember Navarro, Councilmember Rice, Councilmember
Riemer, Ms. Michaelson, Ms. Dunn, and Ms. McMillan:

Thrive Montgomery 2050's path to the full council has been rocky and irregular. Some councilmembers have invited
members of the public to submit language to improve Thrive and address concerns. With revisions, Thrive could be a
better foundation for the next thirty years. This letter and attached document, an annotated Word version prepared by
five citizens (Amanda Farber, Cheryl Gannon, Joyce Gwadz, Dedun Ingram, and Naomi Spinrad), is therefore
submitted for your consideration. Our letter discusses general issues and provides recommendations for the
document, followed by more specific comments about each section. The Word document includes specific language
changes and comments for your consideration. Extraneous formatting markup has been removed for readability.

Thrive Montgomery 2050: General Comments

1. **Environmental and economic development chapters should be restored.**
Economic competitiveness and environmental sustainability are two of the three overarching objectives of Thrive
and deserve focused chapters. The county's current economic state is not good and Thrive should focus more on
how its policies will work to improve the county's economy, including small businesses. Without a stronger
economy many of Thrive's goals will be unaffordable. The county is already feeling the impacts of climate change
and a chapter focused on policies aimed at dealing with climate change seems critical. Identifying elements of the
other chapters that relate to the economy and the environment is helpful, but not sufficient.

2. **Thrive must place primary importance on Master and Local Area Planning Processes and other
mechanisms of robust citizen input such as charrettes and citizen advisory panels to implement changes
in zoning and uses, particularly among residentially zoned properties.**
Countywide changes cannot take into account differences that Thrive already recognizes, such as
rural/suburban/urban, as well as ways to increase income as well as racial and social diversity in particular
geographical areas in the context of existing development.

3. **The possibility that county residents' preferences in housing and other aspects of their lives will
change, and the likelihood that technologies will also alter how we live, require that Thrive acknowledge
the vital role of the master planning process to implement policies to achieve the three overarching goals.**
Thrive is premised on many assumptions, including that a substantial number of residents now want to live in
dense urban areas, and that this number will grow. Recent studies – for example, https://www.pewresearch.org/

- suggest changes in housing preferences and patterns. Technological changes can have similar wide effects not just on housing preferences, but also on transportation, shopping, and working choices and preferences. The master planning process allows public input that reflects how people actually live and hope to live. This democratic, bottom-up process is key to keeping Thrive flexible and relevant as it aims to achieve its goals.

4.   The language throughout Thrive is often vague.

Vague language, without definitions of terms and concepts within the text or as footnotes, has undoubtedly contributed to the many different interpretations of what Thrive actually says. Some definitions are even missing from the glossary appendix. For example:

·   "Neighborhood" and "community" are used frequently, "district" occasionally, but none of these are defined.

·   In the Complete Communities chapter, "within one of the state's four growth tiers" is never identified as a reference to Maryland's Sustainable Growth and Agricultural Preservation Act of 2012 (Senate Bill 236). Other cases are noted within each chapter.

5.   When definitions are provided, they are often incomplete.

For citizens around the county, this leads to greater uncertainty about what Thrive is proposing and allows individual interpretations. For example, on page 21 (Compact Growth), although there are descriptions of activity centers of different sizes, there is no guidance as to what public and private facilities might be associated with a particular size activity center. A school? DMV office? Full service grocery store?

6.   Thrive sees only one path to achieve the overarching goals of economic health, racial equity and social justice, and environmental resilience.

There is only fleeting mention, in the conclusion, that there may be other ways to achieve the three goals. Thrive focuses on planning concepts that are in vogue today but often unproved, and has a limited view of technology, its potential for change, and how quickly it can change. Yet Thrive's proposed policies are often mandates instead of recommendations, and it states repeatedly that they "will" lead to the desired goals. We believe that Thrive should include policy recommendations, not mandates, and that it should include recognition of technology's potential changes. For example, simply replacing polluting gas vehicles with electric vehicles will on its own do little to reduce congestion and the need for roads.

7.   Comments about the 1964 plan and 1993 update are overly simplistic, loaded with value judgments, and sometimes contradictory.

Plans are shaped by their times and the people who write them. Fifty years from now Thrive – like earlier plans – is likely to be viewed critically as well. Thrive should be straightforward about what needs to change without impugning the motives or capabilities of those who wrote the 1964 plan and 1993 update.

8.   Thrive does not pay adequate attention to land use policy as it relates to seniors, the disabled, families, those with low incomes, and both the general and specific needs and situation of people of color, including Blacks, Latinos, and Asian Americans, and others.

Thrive displays limited concern about displacement with no suggested policies to prevent it. It fails to recognize that the county has communities that are not high income and White but where home ownership is highly valued and meant to last years and to build wealth. Displacement is mentioned only four times in the entire document, gentrification only three times – and none of these mentions involve a proposed policy to prevent them. As a result, some members of the public have inferred that Thrive is meant primarily to meet the demands of a small portion of the population who will not require many County services.

9.   It is young people who will live longest and most intensely with unintended consequences.

Accurate data, specific metrics at regular intervals, and openness to new information and technologies are the best way to ensure against unintended negative consequences, or at least reduce their impact. Our proposed changes and comments identify places where more information of these sorts would be useful.

10. Figures and tables need to be made ADA compliant with readable, informative, accurate titles and readable legends.
As well, in some cases figure and table sizes should be increased to improve readability.

11. The "metrics" listed at the end of each chapter to evaluate progress toward goals are no more than categories.
These are not metrics but broad categories, with no indication of the sorts of changes needed. Specific goals tied to specific timelines and checkpoints should be included in each chapter.

<u>**Comments on Specific Sections**</u>

1. **Introduction**
    · It's vital that there be more explanation and discussion of the important role of master planning, that the map showing all the area master plans be included, and that Thrive explicitly acknowledge that any major changes be done through the master plan process rather than through countywide changes. We have added language from the staff draft of Thrive to this section.
    · Although the introduction talks about constraints on new development including lack of vacant land, it does not mention the already zoned capacity discussed on page 33. This presents an incomplete view of development capacity. It also ignores planned projects.
    · We have serious concerns about the portrayal of community engagement, as indicated in our comments in the document.

2. **Compact Growth: Corridor-Focused Development**
    · Include a map showing the growth areas from the 1993 plan to contrast with what is being proposed in Thrive, and add more information about the differences.
    · Exactly what "centers of activity" comprise should be defined in the narrative and in the glossary in more detail: for example, what public facilities are necessary.
    · Ensure that the definition of "centers of activity" is consistent across chapters. For example, in the Complete Communities chapter, centers of activity in suburban and rural areas "range from large retail shopping centers such as Aspen Hill, to clusters of commercial and neighborhood serving retail uses like the shopping areas in Potomac Village or Four Corners."
    · Further, based on a sentence in the first paragraph of the Compact Growth chapter, and others in the Complete Communities chapter, it appears that downtowns, town centers and rural villages, are not "centers of activity", but are places where compact growth is desired ("Thrive Montgomery 2050 proposes redoubling and refining efforts to concentrate growth in downtowns, town centers, rural villages, and intensively developed centers of activity..." and "through infill and redevelopment within centers of activity along corridors as well as within existing downtowns, town centers and rural villages."). Yet other text in the Compact Growth chapter also seems to indicate that villages and neighborhood centers are not considered to be centers of activity: "The Growth Map identifies several existing and potential centers of activity at a variety of scales, including Large, Medium, and Small as well as Villages and Neighborhood Centers."
        o What is the distinction between centers of activity and downtowns, town centers, rural villages, neighborhood centers?
        o The sections that describe large, medium, and small centers of activity are too vague and do not convey to the reader what geographic entities are included in each category. At the least, the category

descriptions should name the types of areas considered to fit in each category and give population size indications – naming some examples for each category would be helpful.

    o The confusion continues when "node" is used as a synonym. The document should use one term consistently.

· In the description of the Corridor-Focused Growth areas on the growth map, there is no mention of Complete Communities or centers of activity. Yet in the description of the Limited Growth areas, creation of Complete Communities is mentioned. There needs to be integration of the concepts of centers of activity and Complete Communities with these three different types of growth areas.

· There is a lot of focus in the Compact Growth chapter on the Agricultural Reserve. Nowhere is the size of the area (as a percentage of the total county area) mentioned. This should be added. Further, some discussion about rural areas not in the Agricultural Reserve should be added.

3. Complete Communities: Mix of Uses and Forms

· No definition of complete communities is provided. At the least, there should be a discussion about the minimum requirements for an area to be considered a complete community. Does it include a center of activity? Must it contain a supermarket, pharmacy, schools, library, fire station, police station, medical offices, housing, parks and public open spaces? What other public amenities would be required - sidewalks, bike lanes, access to transit? What are the characteristics of Complete Communities in the three different growth areas – Large, Medium, and Small?

· In the Different Ingredients for Different Communities section, as well as other sections such as the Retrofit section, the lists of things that would need to be added to the different community types in order to make them "complete" generally seem incomplete and routinely leave out mention of parks and public spaces. These sections need to be more carefully and consistently written.

· Language needs to be added throughout this chapter that calls for use of the master and sector plan process to implement the various changes called for in uses and housing types allowed in different areas. This section repeatedly calls for expanding the uses allowed in residential neighborhoods. The statements need to be tempered with references to use of the master and sector plan processes to implement any such changes and also to requiring that any expanded uses must be reasonable given the context of each neighborhood.

· The assumption in this chapter is that infill development and redevelopment will necessarily be environmentally beneficial. When this development involves removing large surface parking lots this no doubt is true. But when it involves removing detached houses from single-family neighborhoods and replacing them with larger multi-family housing or other structures, the environmental consequences may not be beneficial but may actually result in increased heat islands, stormwater run-off, and decreased tree canopy. This needs to be acknowledged in the appropriate places in this chapter and language added requiring that infill development/redevelopment be done so it does not have these negative impacts.

· This chapter denigrates single-family neighborhoods to some extent. Instead, it should recognize that single-family neighborhoods continue to be what many county residents prefer and acknowledge that they have a place in the county's diverse housing options.

4. Design, Arts, and Culture: Investing and Building Community

· This chapter is disorganized and confusing. This is a land use/natural resources plan and there is no need for language about Arts and Culture beyond noting that the built environment should include space, distributed equitably, for art and cultural activities and those who engage in them.

· If there is a determination that arts and culture should be included, the chapter should be divided into two separate subsections.

· Ensuring that space for Arts and Culture is included in development is very different than fostering different arts engaged in by diverse people in multiple communities. Will quotas be set? Who decides who gets support? The establishment of grant programs for the arts should not be a concern of a general plan.

· If special accommodations (housing, dedicated space) are acceptable for those in the arts and cultural fields, why not others? Why not housing for police and teachers?

· Regarding the appropriate concern with design of the natural and especially built environment, there is no

differentiation in Thrive between areas like the downtowns and activity centers and residential areas. For example, there is support for wide sidewalks but imposing this in many existing residential areas is challenging and roads are already narrow here. Yet there is also support for narrowing roads, without distinguishing where.

· There is no recognition that views about what is good design are subjective and change over time.

· As with other chapters, there is little acknowledgement that the vast majority of people rely on cars for essential activities, and that we all rely on vehicles for the delivery of goods and services.

· More information is needed about how buildings can be constructed to be more adaptable – not detailed techniques but, for example, the characteristics that will allow an office building to be converted into residential units of various types and sizes.

· If this chapter is to contain statements that public art and design help to create economically successful communities, supporting evidence should be included.

5. **Transportation and Communication Networks: Connecting People, Places, Ideas**

· This section makes broad assertions which may not hold up over time, or even reflect current realities.

· *Thrive* does not contemplate changing transportation needs. The plan does not include a comprehensive call for extensions of red line metro or increases in MARC availability (as proposed in Corridor Forward) or preparations for newer forms of transportation. The plan ignores the high financial cost of public transportation and its inequitable burden on some communities.

· Another broad assumption is that residents favor walking, biking and public transportation over car travel, which will be true for many, but not all, residents. Not all residents who are employed live and work on a metro line, and not all residents are able to travel everywhere by walking and biking, and not all services are accessible using those modes. Thrive should acknowledge that cars will continue to be a major source of transportation within the county for many years to come.

· The document has internal inconsistencies, asserting on one hand a need to reduce car traffic to increase safety and environmental resilience, which includes removing traffic lanes for sidewalks and adding bike lanes, and on the other hand advocating for building more streets in residential neighborhoods for interconnected street traffic grids, which will bring more car traffic through neighborhoods.

· Thrive must allow for periodic review and adjustment through the master plan processes as evolving transportation needs become clear, taking into account existing amenities in specific neighborhoods.

· Public transit, road and sidewalk changes, and adding bike lines are all expensive. Thrive does not address transportation funding priorities directly or considering the best return on investment.

· We are on the cusp of major changes in the transportation realm, including significant technological changes which will change mobility dramatically. *Thrive* makes passing reference to these changes without any discussion of how to prepare for and adapt to them. Instead, Thrive discusses current metro and bus systems as the only transportation modes that will exist other than walking and biking. For example, charging stations for EVs are a major challenge everywhere to increasing use of EVs and the plan makes no mention of that challenge or how it will be met. There are other jurisdictions, like Baltimore for example, that have put measures in place on public property, but Thrive is silent about this.

· The communication part of the section is incomplete and redundant, repeating sentences about building high speed communication networks without detail about how and where and with what zoning and regulatory changes. The plan fails to recognize that simply building a telecom network does not in itself create equity with underserved communities if the residents can't afford to subscribe to the services. The plan should call for requiring reduced or free cost access to residents with economic challenges as part of the zoning and regulatory changes that will allow deployment.

· The Council should consider consulting a panel of transportation and telecom experts to help predict the future landscape of transportation, financing, implementation, and equity and likewise the future of information technology, zoning changes needed for a roll-out and equity and financial issues with regard to these.

6. **Housing for All: More of Everything**

· The assertion that more housing will bring more jobs and boost the economy runs throughout this section, without support. The study of White Flint for Planning found that the limited job growth in the county is

holding back residential construction, in which case the jobs must come before the residential construction will happen. The relationship between housing and jobs is at best unclear.

·   Assertions of the benefits of adding different types of housing ("missing middle," duplexes, triplexes, quadplexes, small apartment buildings, and the like) are made without support, and without consideration of the experiences in other areas of the country (for example Austin, Minneapolis, Chicago, New York) where results have been mixed at best, and in some areas more negative than positive.   Additional research regarding the actual experiences in other parts of the country, not what those advocating change hoped would happen, should be reviewed before changes such as those described in this section should be considered.

·   Although there are likely to be places in the county appropriate for increased density, including in the older, more fully developed neighborhoods, one-size-fits-all (or many) would be the wrong approach. Thrive needs to make clear that any changes to zoning to permit increased density are to be made through the master / sector plan process. This process provides for community involvement (working toward community buy-in and support) with attention to local factors. It also helps ensure essential and accurate analyses of attainable and affordable housing prospects, and careful consideration of infrastructure needs, street capacity, stormwater management, tree canopy, and other issues.

·   This section includes data points and charts, but many of these need better explanation, titles, and sourcing.

  o Where percentages are used, absolute numbers should also be presented to give a complete picture.
  o Where averages are shown (for example, for sales prices and rent), the median should be included as well, as the average can be distorted by outliers.
  o Some of the charts are misleading. Please see the comments to this section in the markup.

·   All references to residents being "over-housed" (and its ties to an aging population) should be deleted and the concept dropped from Thrive. The implication is that the "over-housed," especially the older and "empty-nester", need to get out of those homes and move to something smaller, presumably so the homes can be sold to larger households or divided into duplexes, triplexes, or apartments. There is no place in Thrive for the judgmental implications of the "over-housed" concept.

  o Individuals and families make personal decisions regarding the size of a home, where to live, when to stay and when to move.
  o Older residents whose children are grown often want to stay in the family home as long as circumstances and health permit, providing a place where grown children and their families can gather and stay for a longer visit.
  o The "over-housed" in the workforce, regardless of age, and especially parents with children at home, may need space for working at home – one or more separate home offices - as has become abundantly clear during the pandemic.

·   Adequate and accurate data is missing from the discussion of housing needs. The data presented must include, among other things, the number of residential units (single-family and multi-family) now being built or that in the future could be built under current zoning, to accurately present the unmet needs. Without this information, the assertion that substantial increased density is required to accommodate the new residents is not supported by the facts presented.

·   Statements and data presented contradict the many statements made about Thrive that one of its goals is to increase home ownership, especially among low- and middle-income residents. Figure 60 shows almost 60% of new housing being rental housing. Adding primarily rental properties increases the percentage of renters, not owners. This apparent inconsistency in goals needs to be resolved.

·   There is much in this section about providing a diversity of housing to improve access of low- and moderate-income residents to services, amenities, and infrastructure, which access most would get only by moving to a new area. Equal attention must be given in Thrive to providing our low-and moderate-income residents the same level of services, amenities and infrastructure in the communities in which they now live.

7. **Parks and Recreation for an Increasingly Urban and Diverse Community: Active and Social**
This is the best written and most organized chapter of the document.

8. Conclusion

The conclusion would benefit from more detail about implementation and indicators for measuring progress.

9. Appendices

Some words used in the main document need definitions in the glossary, and others need more detail and/or changes.

We know you are getting many comments from many individuals and organizations. Our experience is that if people feel they have been heard and their concerns considered, they are more open to collaboration and compromise. You have an opportunity to create that environment, and we hope our thoughts will be useful. We can discuss these thoughts with you if that would be helpful. Thank you for your attention.

Sincerely,
Amanda Farber
Cheryl Gannon
Joyce Gwadz
Dedun Ingram
Naomi Spinrad

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9 attachments

5 - Transportation .docx
740K

1 - Introduction .docx
324K

2 -CompactGrowth .docx
860K

4 - Design, Arts, Culture.docx
225K

3 - CompleteCommunities.docx
49K

8 - CONCLUSION .docx
159K

7 - Parks and Recreation.docx
527K

6 - Housing .docx
1250K

9 - APPENDICES .docx
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