

Nancy Abeles

June 17, 2021

Re: Thrive Montgomery 2050

Dear Councilmember,

It is time to position Montgomery County suburbs for Smart Growth, Complete Communities, systemic equity, wider transit access, and a healthier quality of life. As delegate to WMCOG's TPB CAC and multiple local transportation project advisories, I support *Thrive Montgomery 2050's* combined multi-modal/land-use approach to attain these goals.

However, I strongly object to the plan's proposal to eliminate county-wide single-family zoning and impose By Right redevelopment in our communities. This, heightened by concurrent ZTA proposals from within the Council, has caused and will continue to incite pushback from neighborhoods that might otherwise endorse *Thrive's* "gentle densification" and "Missing Middle Housing." *Thrive's* up-zoning plans would destroy consumer confidence in our County's housing market and put the County farther behind our neighboring jurisdictions in the race to attract businesses and investment. And the Planning Board's rush for Council approval, (submitting a drastically modified final draft and legally questionable draft absent public review) raises more questions about the plan.

Below please find my detailed analysis of *Thrive's* deficiencies and why the Council must slow down the approval process to minimize resistance, make the plan workable, and serve the legitimate interests of your current, as well as future constituents.

Concerns:

1. **Overrides Negotiated Zoning Maps and Sector Plans:** Why does Thrive contradict MNCPPC's recent rewrite of county's zoning map and Bethesda CBD and sector plans that were carefully crafted with community input before adoption? *Thrive* takes the stance that these new, updated plans, which called for preservation of existing neighborhoods, are racist. Single-family communities see this unfounded theory as an excuse to unfairly impose penalties upon their already diverse communities, harming both minority and other homeowners. White residents of today's Montgomery County single family neighborhoods had no hand in historical racially-motivated systemic housing tactics.

Historically, racism indeed took opportunistic advantage of zoning. But according to such zoning experts as William A. Fischel, Dartmouth College, [the origin of single-family suburbs had a different genesis](#). In brief, at turn of the previous century, people lived-worked on farms or lived-worked in a city. Electric street cars and trolleys allowed people to commute to yarded homes in

leafy suburbs proximate to fixed routes. Later, motor cars, trucks, and buses could access *any* street. Meanwhile, lured by cheaper land and technology, new types of employers expanded into suburbs. To protect their life's most significant financial investment value, by informal practice leading to codified zoning, people who could afford these homes sought to confine apartments and commerce to the main or arterial roads with fixed transit routes.

2. **Charge of Racism to Justify Developer-friendly Strategies:** While positioning racism as nucleus of its rhetorical slant and strategies, Thrive coopts minority and other communities by presuming to speak for them and dictate the nature of our neighborhoods. It is striking that *Thrive Montgomery 2050* fails, even in reference, to reflect feedback from actual disadvantaged or racial minority communities. Nor does it advocate for closer collaboration with them--let alone for their self-determination--by directly asking *them* what *they* envision for their communities in future. Instead, we see lots of pretty pictures—of developer visions.

That admonition might be futile here, where greater obeisance is paid to developers and “astro-turf” groups funded by developers than to impacted communities and their members. Best Practice planning, however, is not built on caving to minion tsunamis that developers muster at plan reviews. Midpoint between YIMBY and NIMBY, decisions-makers must equally weigh the needs and empirical wisdom of all stakeholders and in specific contexts. As Elizabeth Schilling of Smart Growth America said, *“Engaging community members in decisions about where, what, when and how to invest, build, and preserve is what makes smart growth smart.”*

“Builders do not care what they build as long as they build stuff that makes lots of money,” said a former Fannie Mae multi-family unit specialist I consulted in preparing this letter. He added that changing the rental-to-owner ratio indeed changes and deteriorates neighborhood character by increasing transience. And that the premium cost of land near transit leaves the County with only one option: some form of subsidization to add affordable units. County realtors I also consulted concurred with him that By-Right county-wide up-zoning will not solve cited housing problems but rather would destroy consumer confidence in any home purchase.

Planners and realtors urge prospective home purchasers of any unit type to review corresponding planning plats and plans to make an informed home purchase in view of myriad risks, the very reason leading to zoning. Random By-Right up-zoning would negate consumer confidence in a financial investment of maximal magnitude for most people. The possibility of random up-zoning would be the final nail in the coffin of public credibility in Montgomery County's Planning Commission and County Council, especially among ZTA targeted communities that have already witnessed reneged-upon master and sector plan parameters for density, mass, and dimension for multi-family projects such as those in and around Bethesda.

3. **Ignores Interjurisdictional Mobility and Features that Attract Investment:** Compact, walkable, and transit-oriented communities must contribute to Montgomery County's environmental survival, to address rapidly accelerating climate change. Yet *Thrive* ignores interjurisdictional mobility for region-wide personal or business access. We also

need to attract significant new employers to grow well-paying jobs, so residents can afford to buy existing or new single-family homes here and fill the county's overabundance of empty (mostly too tiny) luxury rentals. Yet *Thrive's* final draft eliminated its on the economic development that would account for housing expansion beyond major as-of-yet-unbuilt pipeline projects.

4. **Ignores Key Recent Housing Choice Preferences:** Recent WMCOG public surveys and national data reflect potential permanent change to personal housing, travel, and lifestyle choices as result of the Covid-19 pandemic. But *Thrive* promotes rapid Urbanization as The Answer, failing to consider, let alone acknowledge, that people's daily personal decisions may now be permanently altered--or indeed that personal preferences play any part in housing preference at all. *Thrive* and the ZTAs need to recognize the data in WCOG's *Voices of the Region Survey*: only 25% of respondents prefer an urban living environment, with the remainder population almost equally divided among older suburbs, newer suburbs, and rural areas.

How to Best Move Forward: SLOW DOWN!

If MoCo Council aims to build MoCo's sense of community with equitable diversity, it must slow the process of adopting *Thrive Montgomery 2050* and revise its current "one-size fits all" approach to housing. *Thrive Montgomery 2050* aspirations are good, but its tactics demand analysis. All consequences of sweeping dictums and legislation to override master and sector plans must be analyzed. I reiterate my suggestion at the last *MovingMontgomeryForward* conference to Planning Department Director Gwen Wright: that the department institute a county-wide community advisory to provide its Board with vetting feedback—not to bypass general public engagement but to proactively assist in development of conceptual directions such as those in *Thrive*.

The County Council itself must also reflect upon its supposed commitments to transparency and due diligence, as well as to simple public-facing optics. The public has just seen ZTA legislation proposed without preliminary Council study, discussion, or internal vetting, largely, we surmise, as result of outside interest group influence. If such groups, with limitless financial and employee resources, questionably cited as "non-profits," intercept qualitative public engagement, then the public will not forget.

Thrive Montgomery 2050 is a 30-year plan. Why can't the County afford a few more months to get it right?

Most Sincerely,

Nancy Abeles

Immediate Past Chair and current Montgomery County Delegate-WMCOG Transportation Planning Board CAC, Delegate, 355 South BRT CAC Chair, BRAC BIC Committee.