



June 15, 2021

Written Comments on Thrive Montgomery 2050 Plan¹ ahead of Montgomery County Council's Hearing on June 17, 2021.

Submitted by Denisse Guitarra

Maryland Conservation Advocate, Audubon Naturalist Society (ANS)

Dear Montgomery County Council,

For 124 years, Audubon Naturalist Society has inspired people to enjoy, learn about and protect nature. We are Headquartered in Montgomery County at Woodend Nature Sanctuary (which is free and open to the public) and are a major environmental education partner for Montgomery County Public Schools. We provide nature education and outreach programming to children and adults, advocate for stronger policies on human health & access to nature; biodiversity & habitats; addressing the climate crisis; and sustainable land use. Our Director of Conservation serves as co-chair of the Stormwater Partners Network of Montgomery County, of which ANS was a key founder.

We have directly engaged in the Thrive 2050 process since its inception: by hosting virtually and in person, webinars, and discussion fora with the public and with representatives of watershed groups, helped the Planning Department improve its Spanish-language outreach by providing outreach feedback, inviting them to our Long Branch community outreach events, and co-hosting online bilingual webinars. ANS brought together BIPOC leaders around environmental issues as part of the MORE Network, Montgomery for All Coalition, Stormwater Partners Network, and the new Montgomery Forest Group around Thrive 2050.²

We thank the Montgomery Council for the opportunity to testify and provide written comments of the areas we support and propose to be amended on the County's New General Master Plan - Thrive Montgomery 2050 (The Plan). We list our comments as follows:

¹Montgomery Planning (2021) Thrive Montgomery 2050 – General Master Plan. Available from: https://montgomeryplanning.org/wp-content/uploads/2021/02/THRIVE-Planning-Board-Draft-2021-Pages_web.pdf

² Partial summary of Thrive events and actions hosted or lead by ANS. 2020. Available from: <http://conservationblog.anshome.org/tag/thrive-2050/>

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ANS supports the following elements of the plan:

- **Protection and creation of greenspaces:** We support the Plan’s recommendation of increasing the number of parks, protecting our parks as natural solutions for climate resilience, biodiversity, and habitat protection, and fostering healthy communities. We support creating more opportunities and eliminating barriers for underserved communities to enjoy the wonders of our Parks system. Protecting and expanding our currently existing green spaces, forests, and waterways will always be a better cost saving measure for climate change mitigation than to destroy and then replace them elsewhere due to sprawl development.
- **More urban housing equals less sprawl:** The Plan’s emphasis on urbanism as a strategy to protect natural spaces and reduce sprawl, while concentrating development around transit corridors, is a balanced and well thought out approach to sustainable land use development and matches the county’s needs. Higher-density housing centered around transit corridors is an essential component to climate change mitigation. If people of all income levels have more housing options to choose from near urban centers, then people will be less likely to rely on cars and instead use public transportation to get around. More highway expansions (which support sprawl development) also equate to more greenhouse gas emissions from driving, more flooding from stormwater runoff whooshing off more impervious surfaces and impacts to our local air and waterways from vehicle emissions, salt runoff, and more.

At the same time, we need to find ways to preserve the existing natural spaces and not over-concentrate pavement at the expense of greenspace. Keeping lot coverage requirements the same while allowing more units in the same footprint as proposed in ZTA 20-07³, will reduce the need for cars and new roads, and increasing forest conservation requirements will all help strike the right balance between increasing urban housing while protecting the green spaces that people living in dense areas need all the more. Our recommendations in the next section will help achieve this balance.

- **Functional and livable communities:** We support the approach and emphasis given in the Plan to connect people to their environment and promote healthy and active lifestyles, and planning for people not cars. This policy highlighted across the Plan will ensure that county residents can easily access basic needs within a short distance. The “15-minute living” policy is a sustainable urban policy approach being replicated across the world that

³ ZTA- 20-07: R-60 Zone - Uses and Standards. Introduced on December 8, 2020. Available from: <https://www.montgomerycountymd.gov/COUNCIL/Resources/Files/zta/2020/ZTA%2020-07.pdf>

seeks to balance growth with climate change priorities.⁴ Allowing people to reach all places they need withing a short distance and time by walking, biking, or even wheel chairing will cut down significantly on greenhouse gas emissions and increase people's health, wellbeing, and connection to their community.

ANS recommends amending the following:

- **Increase Black, Indigenous, and other People of Color (BIPOC) inclusion:** Although “equity” is one of Thrive Montgomery 2050’s three main pillars, many BIPOC groups felt left out of major conversations as the General Plan went through its various revisions and creation phases. We advocate for a true commitment from both Council and the Planning Department to put in place stronger policies and language in the Plan that lines up with the County’s Racial Equity and Social Justice Act and seeks to prioritize land use policies that are inclusive, and actively seek feedback from BIPOC individuals, groups, and communities. We ask for the co-creation of community-led outreach & engagement decision making processes that are fair, equitable, relevant, timely, and efficient.
- **Stronger climate change policies:** We would like the Plan to have stronger climate change policies within the “Parks and Recreation” chapter. As it stands right now, this chapter only focuses on increasing park access but misses the opportunity to highlight the urgent need to protect our greenspaces and waterways to enhance climate and community resilience, such as from urban heat island effects and flood risk. It also needs a much stronger focus on preserving and enhancing the County’s more remote, natural Parks-managed areas.
- **A standalone environment chapter:** Council should revise the Plan to bring back the “Health and Sustainable Environment”⁵ chapter found in previous versions of the Thrive 2050 Draft plans, and which contained stronger climate provisions than the version last published. Furthermore, we advocate for a stronger cross-collaboration and merged policy goals between the new General Plan and the new Climate Action Plan (CAP). The General Plan should contain a clear and strong set of climate policies and actions that are consistent with CAP and will truly help the county meet its climate change goals.

⁴ C40 (2021) Available from: <https://www.c40.org/other/agenda-for-a-green-and-just-recovery>

⁵ Thrive Montgomery 2050 Draft Plan. October 2020. Health and Sustainable Environment chapter - page 95.

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

- **No net loss of forests:** Trees provide countless ecological services such as creating healthy communities, preventing floods, capturing, and storing carbon, purifying our air and water, and reducing urban heat island effects. None of these natural ecological services could ever be replaced by built infrastructure. Despite the well-established benefits of trees and an existing Forest Conservation Law, Montgomery County continues to lose trees and forest cover. Between 2008 and 2016, development in the County cleared 1,383 acres of forests – the 5th highest amount of forest cleared among all counties in Maryland.⁶ Updating the county’s Forest Conservation Law and setting a policy goal in the General Plan to do so such that the county adopts a “no net loss of forest” policy, would be an important step towards protecting our natural resources as key climate mitigation prevention measures. This step would also follow other counties around the state, such as Howard, Anne Arundel, and Frederick. Frederick County passed Maryland’s strongest local “no net loss of forest” law last summer.⁷
- **Net zero buildings:** The Plan does an excellent job emphasizing the need to plan for people and not for cars, but lacks strong policy recommendations for buildings, which are the *largest* contributor of greenhouse gas emissions in the county. It is therefore essential that the Plan have a stronger building greenhouse gas reduction policy in place to create sustainable, energy efficient buildings that reduce GHG while harmonizing between wildlife, waterways, and people. One clear step would be for Council to adopt the 2018 IgCC green construction code.⁸
- **Stormwater management:** The Plan should call for an increase in stormwater management protections that not only meets but exceeds our current regulatory requirements in order to accommodate the upcoming increase in frequent and heavier rainstorms due to climate change. One solution would be policies to reduce the number of stormwater waivers being currently granted by DPS for re-development. Another would be adding more impervious surface caps overlays to sector and master plans, which the General Plan should provide a process for prioritizing and doing.

⁶ CBF (2018) Based on data from the Maryland Department of Natural Resources from individual county Forest Conservation Act Annual Reports and compiled by the Chesapeake Bay Foundation. Some comparative data was only partial because counties did not submit at least two annual reports to the State, in violation of the State Forest Conservation Act law. Available from: <https://www.cbf.org/document-library/cbf-guides-fact-sheets/md-fca-fact-sheet.pdf>

⁷ Frederick County Government (2020) Frederick’s Forest Conservation Law Changes. Available from: <https://frederickcountymd.gov/DocumentCenter/View/324596/Protecting-Frederick-County-Environmental-Resources>

⁸ ANS (2020) Comments on the 2018 IGCC. Available from: <http://conservationblog.anshome.org/blog/take-action-submit-your-green-building-code-comments-to-dps-before-april-30/>

- **Renewable energy policies:** The General Plan should also provide guidance on where local renewable energy generation projects should be sited within the county, whether solar, wind, geothermal, or other such projects. These projects should first be sited on already-developed lands like parking lots, rooftops, brownfields, and county properties, prior to moving into undeveloped spaces such as forests and the Agricultural Reserve. Such policies and guidance are completely missing in the General Plan, and the challenging discussion on solar in the Agricultural Reserve last year highlighted the need to proactively plan better for this essential countywide resource.
- **Agricultural reserve:** The Plan lacks a complete analysis and policy recommendations on the pros and cons of continuing or changing the systems in place in the Agricultural Reserve. Reserve stakeholders have frequently expressed concerns regarding the absence of specificity in long-term commitments to protect the Reserve in the Thrive 2050 update, and Council in conjunction with the Planning Department should address that need proactively. The Plan should evaluate existing policies, clearly and strongly plan for the future of the Agricultural Reserve and seek to create new policies that find a balance between food accessibility, sustainability, and climate change where all people across the county can equally benefit from this countywide resource. As currently written, there is too much uncertainty to ensure that the Agricultural Reserve is still one of the treasures of Montgomery County.
- **Metrics and implementation:** We recommend that the Plan incorporates clear and more specific metric requirements and a timeline to ensure that the policies and actions stated in the Plan are enforced throughout the activity, master, sector, and other planning processes. We recommend Council to revise and bring back key components in the “Implementation”⁹ and “Actions List of Resources”¹⁰ chapters into the full Thrive 2050 Plan.

⁹ Thrive Montgomery 2050 Draft Plan. October 2020. Implementation Chapter -page 125. Available from: <https://montgomeryplanning.org/wp-content/uploads/2020/10/Public-Hearing-Draft-Plan-Thrive-Montgomery-2050-final-10-5.pdf>

¹⁰ Actions List of Resources. April 2021. Available from: <https://montgomeryplanning.org/wp-content/uploads/2021/04/Actions-document-final-for-April-8th.pdf>

Overall, we seek the continued protection of our green spaces and emphasize sustainable, equitable, transit-oriented early design planning which enhances quality of life, lowers upfront costs, and builds resilient communities with adaptable infrastructure that mitigates the worst effects of climate change. On behalf of ANS and our 28,000 members and supporters, we thank Council for considering our comments and suggestions.

Sincerely,
Denisse Guitarra
Maryland Conservation Advocate
Audubon Naturalist Society