

June 17, 2021

To: The Montgomery County Council,

RE: Planning Board Draft of the General Plan Update – Thrive Montgomery 2050

Public hearing testimony submitted by John Parrish

The Planning Board Draft General Plan (Thrive Montgomery 2050) is seriously flawed. Please send it back to M-NCPPC planners to rewrite, and reemphasize, protection of the natural environment and the Agricultural Zone, and to protect older communities from the encroachment of “missing middle” housing.

1) PROTECTING THE NATURAL ENVIRONMENT AND THE AGRICULTURAL RESERVE

The General Plan requires an eco-centric, not anthropocentric approach for the natural environment, agriculture and the human community to truly thrive.

The previous update of the General Plan (1993) placed a great emphasis on preserving and restoring the natural environment. The General Plan Refinement of the Goals and Objectives for Montgomery County approved in December 1993 was an outgrowth of the Maryland Planning Act of 1992 which stressed natural resource protection. It is more urgent than ever to increase protection of the natural environment and devote far more attention to these values in the current General Plan update.

The General plan should continue to be built on, and strengthen, the seven visions of the State Planning Act. The first five visions are especially critical to retain: 1) *Development is to be concentrated in suitable areas*; 2) *Sensitive areas are to be protected*; 3) *In rural areas growth is to be directed to existing population centers and resource areas are to be protected*; 4) *Stewardship of the Chesapeake Bay and the land is to be considered a universal ethic*; 5) *Conservation of resources, including a reduction in resource consumption is to be practiced*.

All of the goals, objectives and strategies outlined in the Environment section (pgs. 66-73) of the 1993 General Plan should be retained and strengthened in the Thrive update.

Very sadly, the Thrive draft plan departs greatly from natural resource protection. Instead, the focus has become strongly anthropocentric in a time when an eco-centric approach will be the most urgent need to assure our civilization survives through the end of this century.

Before the Covid lockdown, on February 3, 2020 M-NCPPC staff presented an outline of the Thrive plan to the Council’s PHED Committee. In regard to a healthy and sustainable environment, staff did a good job describing the many issues and challenges that should be a primary focus of the General Plan update. However, since that time, most of the language pertaining to the natural environment has been diluted or deleted. In fact, the Planning Board had the audacity to deliver the final blow and completely deleted the section of the Public Hearing Draft called *Healthy and Sustainable Environment!* **It appears that the Thrive Plan has been directed away from an environmental focus by those in power who consider protection of the natural environment to be an impediment to growth and development.**

The following text is comprised of language that M-NCPPC staff composed for the draft Thrive plan in February 2020. The bolded portions are especially important to reintroduce because they begin to describe

the issues and challenges we face now and into the future. This language needs to be reintroduced to a Healthy & Sustainable Environment section of the Plan and goals and strategies must be defined clearly.

Healthy and Sustainable Environment

A healthy and sustainable environment is a network of natural and built habitats that supports healthy and diverse human, animal, and plant communities, clean air and water, and continues to provide these benefits as the earth and climate change. The built environment influences human health by influencing behaviors, physical activity, social connections and access to resources and the quality of the environment.

The last several decades have seen great changes in the county with respect to all aspects of the environment and our knowledge and understanding of it, including its vital importance to human society, health, the economy, and our ability to protect and enhance it. These changes include new sources of environmental data and the ability to track trends, new scientific understanding, new global and regional climatic trends, new technologies and strategies for improving the environment, and new regulatory frameworks.

Environmental Concerns

Montgomery County has always been in the forefront of protecting and enhancing the natural environment through a broad range of planning initiatives and policies. However, despite the county's rigorous regulatory framework to protect sensitive environmental resources, many indicators such as water quality of the streams, forest lost, and increased imperviousness point to a downward trend. All the County's water bodies fail to meet one or more of the State's water quality standards for their designated uses, and many are under review for additional water quality impairments. Since the start of the State's Total Maximum Daily Load (TMDL) program implementing water quality standards, the number of water bodies that require TMDLs has been steadily increasing. The downward trend in water quality and increases in listed impairments are due to several factors such as decreases in forested and other natural lands, increases in development footprint and impervious cover, and climate change trends towards more frequent, intense, and erosive storms and associated runoff.

Although there are a variety of factors that affect stream condition in the County, the loss of natural areas and the degree of imperviousness is one of the more significant ones. Higher impervious cover leads to higher amounts of stormwater runoff and urban pollutants that tend to erode and degrade stream channels and habitat and the biologic communities they support, leading to degraded stream condition scores and narrative rankings. The down-county areas with higher levels of impervious cover and disturbed and compacted soils, older and less effective stormwater management, and fewer natural areas and undisturbed soils that can filter and infiltrate rainfall to groundwater effectively, consistently show lower quality streams over the years. The Agricultural Reserve and other up-county areas have much lower imperviousness, uncompacted soils, and greater natural and other undisturbed vegetated areas, and generally have higher quality streams.

Climate change

In addition to chronic sustainability issues, climate change caused by Greenhouse Gas emissions (GHG) has emerged as a major issue in the last few decades. Climate change has huge impacts including sea level rise, extreme temperatures, and extreme weather events. Our infrastructure is not designed to withstand the shocks of extreme weather conditions and will require greater resiliency in dealing with growing environmental threats. Impacts will be direct and indirect; for example, the Blue Plains Treatment Plant that treats much of the sewage from the county is in a flood zone threatened by sea level rise.

Climate change will further exacerbate health related issues. Increased temperatures and precipitation extremes have health implications that we are already seeing. Extreme weather events may impact our housing and infrastructure, as well as restrict access to care and community health facilities.

Although the trend for up-county area streams continues to be dominated by streams in good condition, over the years there has been a significant loss of streams in excellent condition. This may be partially due to the more intense and erosive storms related to climate change.

Meeting the challenges of climate change and reducing Greenhouse Gas emissions will require a renewed commitment to conserving and protecting natural areas and other green open space, and limiting development footprint and impervious cover as key strategies to protect water quality and handle increasing stormwater.

Water and sewer

The Washington Suburban Sanitary Commission (WSSC) provides water and sewer service within the Washington Suburban Sanitary District, which includes most of Montgomery and Prince George's Counties except for most of the City of Rockville and the Town of Poolesville.

Most of Montgomery County's water comes from the Potomac River, the rest from the Patuxent River. The main question for the water supply system is whether it has the capacity to adequately handle the needs of an additional 200,000 people in the next 30 years while facing the potential impacts of climate change as droughts become more frequent.

The Agricultural Reserve

The Preservation of Agriculture & Rural Open Space Functional Master Plan (1980) established the Agricultural Reserve through the mechanism of Transfer of Development Rights (TDRs). It was a pioneering and bold initiative that made the county a leader in preserving land for farming and open space. Subsequent controls and policies such as Building Lot Termination and associated preservation easements further strengthened the preservation goals against development pressures.

The Agricultural Reserve covers about 114,000 acres or about 35 percent of the County. Second to parkland, the Ag Reserve contains most of the forested land in the County-38,000 acres or about 40 percent of all forest in the County.

According to the 2017 Census of Agriculture, there are 558 farms occupying 65,537 acres of land. Although big farms (50 acres or more) are decreasing, the number of farms between 10 and 49 acres is increasing, as are farms less than 10 acres. Traditional agricultural activities, including grain farms and livestock operations, have been sustained, while tabletop food production as well as the horticulture and equestrian industries have increased. In addition, interest in agricultural and cultural education and tourism experiences is on the rise.

Many of the County's streams begin in the Agricultural Reserve and other up-county areas. Protecting downstream water quality and stream condition depends on protecting the upstream portions. Without the existing protection afforded by the up-county areas, particularly the Agricultural Reserve, the stream condition of many of the down-county streams would be even more impaired. The benefits of the Agricultural Reserve to the environment in general, and to stream condition in the rest of the County in particular, are inestimable and cannot be overemphasized.

The Ag Reserve is protecting agricultural land, rural open space, and providing important environmental and economic benefits, but at the same time there are competing demands for land for other purposes such as solar energy production and this is putting pressure on the Ag Reserve. New strategies are needed to ensure the Ag Reserve remains protected and economically viable for the next 30 years.

A Healthy and Sustainable Environment section has to strongly emphasize forest preservation, water quality, preservation of the Agricultural Zone, and sustaining native biodiversity if our human quality of life is to be "healthy and sustainable". The draft Plan glosses over environmental concerns and is dismissive to the substance of those concerns. It is seriously flawed. At every step in the Thrive process leading up to the Planning Board Draft, concerns regarding the natural environment have been pushed

aside and ignored. That there is no longer a Healthy and Sustainable Environment section included in the Thrive Plan is wholly unacceptable.

Forest Preservation

Montgomery County has a very low percentage of its land area (<28%) in forest cover. Only two other Maryland counties rank worse in terms of percent land area in forest cover. According to federal studies, *“Acre for acre, forests are the most beneficial land use in terms of water quality. Acting as a living filter, forests capture rainfall, regulate stormwater and streamflow, filter nutrients and sediment, and stabilize soils.”* The excerpt above is from a report titled *“Conserving the Forests of the Chesapeake: The Status, Trends, and Importance of Forests for the Bay’s Sustainable Future”* – USDA-Forest Service, Northeastern Area, NA-TP-03-96. How can we expect to have healthy streams and a sustainable natural environment when existing laws, master plans and environmental guidelines do not go far enough to afford protection to forests? The Thrive plan needs to incorporate and strengthen language from the 1993 General Plan (Objective 8, pg. 72) calling to *“Increase and conserve the County’s forests and trees.”* The Plan should call for improvements to laws, master plans, and environmental guidelines to overcome any shortcomings of the 1993 plan.

Water Quality

Streams and lakes throughout the county continue to degrade due to poor planning. For example, why has it become the annual norm for Lakes Frank and Needwood to be considered unsafe for water contact due to the microcystin toxin each summer and fall? This degradation shows us that development carried out under master planned guidance led to this condition by allowing over-development in the upper Rock Creek watershed. The Patuxent drinking water reservoirs, Rocky Gorge and Triadelphia Lake have also begun to experience harmful levels of microcystin during the summer and fall. The flash drought of late summer-early fall 2019 brought this problem to the forefront. All of this is due to over-development in the Patuxent watershed allowed by, and despite, existing zoning and planning that is supposed to be protective of water quality. The Patuxent River Watershed’s Primary Management Area in Montgomery County must have stricter controls on land use and land development if the Reservoirs are to meet clean drinking water standards for future generations. Objective 3 of the 1993 General Plan (pg. 70) instructs us to *“protect and improve water quality.”* Plus, it outlines nine strategies to achieve the objective. The Thrive Plan should adopt the same approach and strengthen the strategies to realize water quality goals.

High levels of impervious surfaces continue to be the leading cause of stream degradation. More strict limits on impervious cover are needed throughout the County but especially in the Special Protection Areas. Removal of impervious cover in urban areas is highly needed. Stormwater infiltration via bio-swales and rain gardens should be mandated for all existing and planned parking lots.

The Thrive plan needs to recognize the short comings of the previous General Plan and address the short comings by calling for stronger protections for streams and water quality if we and the aquatic life in our streams are to truly thrive.

Agricultural Zone

The Agricultural Zone continues to be threatened by large lot developments, industrial solar and by the applications of toxic pesticides and herbicides to grow crops. The Thrive plan needs to encourage sustainable organic-based agriculture and promote better policies to prohibit land uses that undermine agriculture and public health. Industrial solar should not be permitted and harmful crop herbicides and pesticides should be banned. Strategies must be outlined to strengthen protections for the Agricultural Zone.

Biodiversity

We are now living amid a sixth great extinction event where species are rapidly disappearing from our planet due to massive human caused habitat destruction. The Thrive plan needs to incorporate language from the 1993 General Plan (Objective 6 - pg. 71) to “*preserve and enhance a diversity of plant and animal species in self-sustaining concentrations*” and outline strategies to achieve this objective. The 1993 General Plan strategies should be retained and strengthened in the updated plan.

Climate Change and a paradigm shift

It is good that the Thrive plan acknowledges climate change as a significant threat to our human and natural communities. However, it does not offer a plan that has the ability to withstand the disruptions forecast by a consensus of the scientific community to occur within the 2050 timeframe. The Plan needs to shift to a radically different paradigm where humans are encouraged to live more simply, and with a deeper respect to our limited natural resources. How to live with respect for Mother Earth is what the Thrive plan must expound upon. Living out the American Dream as framed by the Thrive Draft will only exacerbate climate disruption at the expense of the quality of life for most species, including Homo sapiens. The Thrive plan should emphasize the need for humans to drastically simplify our lives by reducing consumption, buying reused products, and recycling our wastes in a more ecologically sensitive way. The Plan should encourage citizens to reduce our individual carbon footprints by driving and flying less, and replacing lawns with gardens so that we mow less.

Noise

The Thrive plan should encourage ways to sharply reduce noise pollution. One good way is to ban or more strongly regulate noise emissions from leaf blowers and lawn mowing equipment. A strengthened noise ordinance that calls for a sharp reduction in decibel levels is needed for peace of mind and body. Objective 10 of the 1993 General Plan (pg.72) states: *Protect residents and workers from unacceptable noise levels.* Strategies to support this objective should to be developed and incorporated into the Thrive Plan.

Transportation

The Draft Plan calls for examining the potential removal of highways from the Master Plan of Highways and Transitways. The Mid-County Highway extension known as M-83 should be highlighted as an example of why we need to revise the master plan. This highway is a relict of poor planning that would devastate streams, forests, biodiversity and communities. Likewise, the Montrose Parkway East extension from Rockville Pike to Veirs Mill Road should be abandoned, and the road right-of-way designated as a greenway park to preserve the ribbon of forest just as was done to create the Matthew Henson Greenway.

Community Gardens

The community garden program in Montgomery County is highly popular. The waiting list to obtain a garden plot is very long. Some folks wait years to obtain a plot. Thrive should promote the creation of more community gardens to accommodate the high demand and promote a healthier lifestyle. Expansion of the community garden program will also give people living in apartments and town homes an opportunity to grow fresh food.

2) PROTECT OLDER COMMUNITIES FROM ENCROACHMENT OF MISSING MIDDLE HOUSING

I am a 25 year resident of the beautiful, unique and well-cared for community of Woodside Park in Silver Spring. Founded in the 1920's, Woodside Park is a green haven situated next to the Silver Spring Central

Business District (CBD). My entire community lies within one mile of the Silver Spring Metro and is directly affected by the proposed Thrive Plan.

I adamantly oppose thrusting “missing middle” housing into older neighborhoods of the County. If enacted, the Thrive Plan will destroy the character and qualities that make Woodside Park and other older neighborhoods desirable and special places to live. If passed, Thrive will result in an increase in the tearing down of homes and replacement with incompatible housing such as apartments, duplexes, McMansions, and townhouses and be highly disruptive to the quietude and quality of life many have worked hard for and deserve. In short, Woodside Park and older communities convey a “sense of place” due to their architecture, greenery, history, and layout. This sense of place would be greatly diminished if the Thrive Plan is acted upon as drafted.

The homes in my community are not only architecturally diverse, but the residents are ethnically, racially, and religiously diverse. Housing choices range from town homes at the edge of the CBD, to a blend of small, medium, and large homes in the interior of the neighborhood. The cost to purchase or rent a home here varies considerably. Current zoning laws allow for homes to have accessory uses which afford opportunities for those who cannot, or do not wish to, purchase a home. We have many homes with accessory usage in our community.

When missing middle housing is planned for a new community I can support it. But as outlined in the Thrive Draft, it would have a disproportionate impact on older neighborhoods. It is highly intrusive to neighborhoods where citizens made choices to reside in what they thought would be quiet stable communities. It is reasonable for citizens to expect that kind of stability in the characteristics and qualities of their neighborhoods. The Thrive Plan would impose on and trample upon the reasonable expectations of residents.

Replacing good quality homes with apartments, duplexes and townhouses would be entirely out of character here. I urge you to tour Woodside Park to see for yourself what would be destroyed. In addition, new construction would bring noise and air pollution and disruption for years on end from heavy equipment, machinery, and work vehicles intruding into the peaceful surroundings of our community. I do not want to live next to a construction site!

The ostensible reasons for the missing middle housing are to provide a range of housing choices for a range of income levels, and to increase density within walking distance of transit. The argument is framed under the guise of an affordable housing crisis – not enough units to meet demand. So why are we not first taking advantage of creating housing opportunities in the Silver Spring CBD where empty buildings have long stood vacant waiting to be retrofitted? And why hasn't enough affordable housing been built as part of the downtown Silver Spring redevelopment boom over the past 20 years?

For years we have heard about the need for more affordable housing and yes it is much needed. **However, the Thrive Plan provides zero assurances that housing will be affordable to lower income people.** In fact it encourages the construction of housing that only middle and upper income people can afford. Locally, recent new housing at the sites of the old Silver Spring Police Department and at the Chelsea School are priced way out of reach of lower income citizens. **Why should we expect anything different to occur if the draft Thrive Plan is approved?**

What we can expect from implementing the draft Thrive Plan is school overcrowding, clogged roads, lack of adequate parking, an increase in construction of McMansions, duplexes, apartments, and townhomes in older neighborhoods and the loss of historic character within the neighborhoods

Thrive really appears to be about promoting higher density development to provide a larger tax base for the County and a boon to developers at the expense of the quality of life in older communities. It is also a slap in the face to the lower income citizens it pretends to benefit. If you want help lower income citizens, then raise the minimum wage requirement beyond \$15/hour so people from all walks of life can afford decent housing.

Please reject the Planning Board Draft and send it back to M-NCPPC planners to find better ways to provide affordable and diverse housing choices. Those goals can be achieved without destroying the character and serenity of existing older communities.

Conclusion

The development of the Thrive plan is occurring during the ongoing Covid crisis and a global climate crisis. More time should be taken to fix fundamental flaws in the plan before it is approved by the County Council. This will afford staff the opportunity to reorient and restore the General Plan toward stronger protections of the natural environment, the Agricultural Zone, and older communities. The Plan must be adapted to guide us through the climate crisis and the pandemics that are forecasted to be more severe in the coming years. **The Covid crisis and the climate crisis must be viewed as an opportunity to reenvision our world in a much better way.** A General Plan update has the potential to do this, but thus far, the Thrive Plan falls short of providing the strong environmental basis to truly thrive.

Anthropocentrism is why we are facing a Covid crisis, a climate crisis, and far too many environmental calamities. Eco-centrism is the only way forward if we expect to live in a world where all life thrives.

Sincerely,

John Parrish