

June 29, 2021

Public Comments in Opposition to Draft “Thrive Montgomery 2050,” As Applied to Woodside Park, Silver Spring

Dear Chairperson Hucker and Council Members:

The following comments are respectfully submitted in opposition to the draft vision plan of the Montgomery County Planning Board, titled Thrive Montgomery 2050 (hereinafter, “TM2050”).

For the reasons stated below, we believe that TM2050 (1) fundamentally mis-characterizes and mis-diagnoses a problem in Woodside Park as being insufficiently dense and under-developed land due to the governing R60 zoning restrictions for single family detached housing; (2) fundamentally mis-characterizes and mis-diagnoses Woodside Park and Silver Spring as suffering from lack of racial and income diversity and/or equity; and (3) fundamentally mis-characterizes its proposals as furthering environmental “resilience” and “sustainability,” when in fact they will likely result in the environmental degradation of Woodside Park.

We therefore respectfully request that the Planning Board reconsider, and after providing real opportunities for meaningful community input, redraft TM2050 to include an appropriate procedure or process, such as a Small Area Plan (SAP) or a “Climate Conservation Overlay Zone,” by which Woodside Park and other select areas in the County may be excluded or exempted from the plan’s corridor development and urban density re-zoning proposals.

I. The Characteristics and Circumstances of Woodside Park

A. The Location of Woodside Park’s “Fifteen Minute Living” Community

Woodside Park already embodies what the draft TM2050 believes is “a useful way to think about how to build complete communities,” and what “should be an organizing principle in planning for their success”: i.e., “fifteen minute living.” (TM2050, p.45) According to TM2050, “fifteen minute living” is the concept of “maximizing...attractiveness and efficiency” by “locating living spaces in each neighborhood or district within walking distance of services, infrastructure, facilities, and amenities that serve the daily needs of the people who live there.” (TM2050, p. 45). Woodside Park already is such a “fifteen minute living” community.

Woodside Park is a relatively small, roughly V-shaped area comprised of approximately 650 addresses, almost all of which are single family detached homes. The truncated southern “point” of Woodside Park’s roughly “V” shape, forms part of the northern boundary of the Silver Spring Central Business District. It “vertical” (oriented north-south) sides are formed by Georgia Avenue to the west, and Colesville Road/Rt. 29 to the east. Its triangular shape is therefore sandwiched between two “growth corridors” proposed by TM2050: Georgia Avenue to the west, and Route 29 to the east. In addition, to the north and south, it is bordered by business districts. The “horizontal” top of the “V” is roughly formed by the east-west oriented Dale Drive, and essentially abuts the Montgomery Hills business district – or, “center of activity” in TM2050 terms. That “center of activity” is comprised of shops, restaurants, gas stations, a pharmacy, and a grocery. Woodside Park residents therefore have their choice of 15 minute walking distance to downtown Silver Spring to the south, or to Montgomery Hills to the North. No “reimagining” or

“urbanization” or “corridor development” or rezoning is necessary for Woodside Park residents to have “fifteen minute living.” We already have it. Woodside Park directly contradicts TM’s assertion that “the preservation and protection of neighborhoods dedicated exclusively to detached single family homes has left residents disconnected from retail and other services....” (TM2050, p. 44).

B. The Bucolic Nature of Woodside Park

Woodside Park was platted for homes over the period from the early 1920s to the 1950s. Historically prominent in the marketing for Woodside Park homes has been the area’s semi-rural, park-like character. Woodside Park almost adjoins Sligo Creek Park, but its close proximity to that park, and a connecting undeveloped pathway from Dale Drive to the park, provides a wildlife corridor into and out of Woodside Park. Woodside Park contains diversely sized lots, with a significant number of large lots of ¼ to ½ acre; a significant number of smaller lots; and a small number of even larger properties that range up to 1 acre in size. The homes are not of a “cookie cutter” form, but range across a wide variety of sizes and styles, from ranch to colonial to contemporary and others. Most of Woodside Park is not sidewalked, but light vehicular traffic on most Woodside Park streets allows for a significant degree of safe, daily residential walking on the edge of the streets themselves, with the exception of its major street boundaries: Georgia Avenue, Colesville Road, and Dale Drive. Finally, its two “growth corridor” boundaries, Georgia Avenue and Colesville Road, are slated to receive Bus Rapid Transit under the County’s BRT initiative, meaning that Woodside Park access to mass transit will soon be independent of proximity to either the Metro or Purple Line stations of Silver Spring. With the advent of BRT, the County’s rationale for basing its proposed zoning changes on Woodside Park’s proximity to Metro and Purple Line rail is significantly undercut, and is instead based on its proximity to the plan’s designated Growth Corridors (Georgia Ave and Rt. 29).

Moreover, there is little evidence to support the Planning Board’s suggestion that Woodside Park is threatened by pending and inevitable home replacement projects (i.e., “tear-downs and rebuilds”). As the Planning Board has documented, there was only one instance of a single family detached home replacement project (i.e., tear down and rebuild) in Woodside Park, between 2011 and 2020. See, Attainable Housing Strategies—Recommendations, Montgomery County Planning Department, MCPB Item No. 7, June 24, 2021, Figure 6, p. 14 (hereinafter, “AHS Recommendations”). Given the diverse and attractive and well-built nature of the existing homes in Woodside Park, this lack of tear-down activity is not a surprise, and suggests that the County’s efforts to frighten residents with the prospect of “McMansion” building in Woodside Park are unjustified. This appears to be another instance of the Planning Board’s imaginary transference of characteristics of other neighborhoods to Woodside Park, without the support of the facts on the ground, in order to advocate its one-size-fits-all urban development effort.

Ecologically, Woodside Park is notable for its significant tree canopy comprised of multiple species, ranging in age from decades-old “giants” to young saplings. A significant number of

large canopy trees are situated streetside (in and out of potential sidewalk areas), including Willow Oak, Bald Cypress, Sycamore, American Elm, Norway Spruce, Maple, and others. Other species in the neighborhood include American Beech, River Birch, Black Gum, White Oak, Redbud, Dogwood, Magnolia, Arborvitae, Katsura, Colorado Blue Spruce, Fringe trees, and more. In addition, there is a noticeable trend among homeowners to install conservation and pollinator landscaping in addition to, and/or in partial or full replacement of, English lawns, as means by which to both control stormwater runoff, and provide native habitat. Consistent with its extensive tree canopy, its private conservation and pollinator landscaping and greenspace, and its connection to Sligo Creek Park, Woodside Park harbors significant wildlife and wildlife habitat. Fox, deer, rabbit, owl, hawk, woodpecker, cardinal, hummingbird, bluejay, goldfinch, and other avian and animal species (even a rare blue heron) reside or occasionally appear (and eat) in residential yards. As we will discuss further below, these ecological features of Woodside Park would all be endangered or harmed by the urbanization proposals of TM2050.

C. The Racial and Income Diversity of Woodside Park

The draft TM2050 provides a map of Silver Spring's and Woodside Park's racial makeup. (See, TM2050, Figure 18, p. 14) According to the draft, Woodside Park is mapped as being "White Majority" owned, meaning 50% to 70% white homeownership; and not as "White Predominant," which means greater than 70% white-owned. Accordingly, Woodside Park has from 30% to 50% non-white homeownership. Furthermore, most of the remainder of the Silver Spring area in and around the Central Business District is mapped as "No Predominant Group," meaning no race has more than 50% ownership in those areas. Ibid. Given the TM2050's acknowledgment that there is already 30-50% non-white ownership in Woodside Park, and "No Predominant Group" in the larger Silver Spring community that is close to or in the downtown area to which Woodside Park adjoins, there is no self-evident justification for believing that Woodside Park or the downtown Silver Spring area is appropriately included among county areas that are "still largely separated along...racial lines." (TM2050, p. 14). To the contrary, in stark comparison with other county areas to the west of Silver Spring, Silver Spring and Woodside Park seem to be models for the type of racially diverse "complete community" that TM2050 is justifiably hoping to achieve elsewhere in the county. Indeed, in the "Complete Communities" section of the draft TM2050, a photograph of downtown Silver Spring appears as an illustration of a "complete community!" (TM2050, Photo, p. 51); and elsewhere downtown Silver Spring is presented as the type of "Design, Arts and Culture" area that the county wants emulated (TM2050, Photo, p. 63).¹ Certainly, the draft TM2050's concession that "the county's overall population has steadily grown more diverse" (TM2050, p. 13) applies to Woodside Park and Silver Spring. Moreover, the draft states that the Planning Board "anticipates a county that will *inevitably* become...more

¹ Apparently, however, the Planning Board has decided that what a "complete community" does not need in order to be "complete," is even a relatively small neighborhood composed exclusively of relatively expensive single family detached homes owned by relatively—but not inordinately--wealthy, racially diverse homeowners, if that neighborhood is located too close to a transit stop.

diverse.” (TM2050, p. 7). Since the draft’s prediction of “inevitably” greater racial diversity seems a reasonable one when applied to the already significantly racially diverse Woodside Park and Silver Spring areas, the necessity of using rezoning, corridor growth, and urbanization in Woodside Park and Silver Spring as means to achieve racial diversity and equity is contradicted by the draft TM2050 itself.

According to County Executive Elrich, the draft TM2050 also defines “equity” in housing, as including “the integration of neighborhoods by...income” as well as by race. Elrich Memo, p. 8 and note 20 [TM2050 page cite missing in note]. While assuming and lamenting that the lowest, and even some moderate, income segments of the county population cannot afford housing in Woodside Park, the undersigned simply do not believe that the intentional “integration by income” of any neighborhood, let alone a small, relatively luxurious and bucolic neighborhood like Woodside Park, through the use of “urbanising” zoning changes that intensify the development and destruction of greenspace, is either feasible, wise, or “equitable.” In our view, TM2050’s proposals offer little or no realistic prospect of “integrating neighborhoods by income” in an equitable way. The County has correctly admitted that the developer-created concept of “Missing Middle Housing” development will not result in any “affordable housing” for low income households in Woodside Park or Silver Spring, as the market cost of such housing would be in the approximate range of \$715,000 to \$855,000; amounts obviously not “affordable” to low income or even many moderate income households. See, Elrich Memorandum, p. 7. With that failure, the Planning Board has scrambled to shift its focus to the provision of “attainable housing” as its justification for urbanizing Woodside Park, without even providing a definition of what “attainable housing” is. Elrich Memorandum, p. 7. Apparently, “attainable housing” is housing that is affordable to persons with an undefined income level higher than “Section 8” residents, but lower than current Woodside Park residents. In other words, the Planning Board’s social engineering effort is now on behalf of the lower middle, or middle, or perhaps upper middle, income classes; the Board is just not sure yet, which.

Most importantly for advocates of social justice, with the Planning Board’s admission that its recommended zoning changes will result in no benefit in Silver Spring or Woodside Park for the least advantaged and lowest income citizens of any race looking for affordable housing, the policy and ethical (“equity”) basis for imposing the burdens of greater urbanization on existing, wealthier Woodside Park residents diminishes, if not disappears. Under a “fairness” social justice theory, the principal non-utilitarian justification for distributing unequal social burdens, such as the civic “duty” of the relatively wealthy to urbanize one’s neighborhood in order to benefit others, is that the others who would benefit are the least advantaged citizens of society. The Board’s attempt to shift the proposed housing benefits to be gained from its “missing middle” and other proposals, from the truly poor to lower-middle or middle or upper-middle class homeowners, becomes an effort to engineer social benefits from one segment of the relatively well-to-do middle class, to another segment of the relatively well-to-do middle class. The undersigned respectfully submit that that is not a politically or ethically sustainable concept of social “justice,” but simply a middle class expansion of social welfare engineering and wealth redistribution for the middle class, with little or nothing for the more needy, truly impoverished class.

Finally with regard to “equity,” many existing homeowners in Woodside Park have purchased their homes with the intent and expectation that the non-urban neighborhood that they chose to buy a home in, would retain its non-urban characteristics for the foreseeable future. How the intentional further destruction of Woodside Park greenspace by urban development is “equitable” to existing homeowners desiring to maintain the non-urban environment they paid a premium to buy into, is nowhere explained by TM2050.

In short, the use of zoning changes to attempt to socially engineer Woodside Park into a neighborhood “integrated by income,” is by the Planning Board’s own admission doomed to failure. Moreover, the intentional destruction of greenspace in Woodside Park to benefit an unspecifiable, because unknown, segment of middle class non-residents who are predicted to want to live in Woodside Park at some time in the next 30 years, is manifestly inequitable to current residents. This is especially the case when there are clearly viable alternative means and locations to create middle class housing in downtown Silver Spring, a truly “urban” area that is closer to mass transit stations than is Woodside Park.

II. Under a proposed implementation plan for “Attainable Housing,” TM2050 Would Enable the Conversion of All of Woodside Park to A High Density “Priority Housing District” Rung By Three Story Multi-unit Housing at its Border Corridors, and Occupied By Duplexes, Triplexes, or Quadriplexes on Any Other Woodside Park Property

Although it does not appear that TM 2050 itself establishes them, the Planning Department’s parallel Attainable Housing Strategies Initiative (AHSI) has recommended the “delineation of a Priority Housing District as a sub-geography within the Corridor-Focused Growth area.” AHS Recommendations, p. 21). Under this proposal, a “Priority Housing District” is defined as follows:

“all of the Corridor-Focused Growth area that falls within a mile of a Metrorail or light rail station, ... or 500 feet of the centerline of a Growth Corridor identified in the Thrive Montgomery 2050 Growth Map.. The Priority Housing District is where staff recommends more intensive change, including allowing house-scale quadplexes by-right and allowing the greatest parking reductions.

Ibid. Under this definition, all of Woodside Park would be a Priority Housing District (PHD), as all of it meets either the “1 mile proximity to Metrorail or Purple Line” standard, or the “500 feet from Growth Corridor centerline” standard. Accordingly, any property in Woodside Park could be converted to duplex, triplex, or quadriplex multi-unit housing as a matter of right. Moreover, the “greatest parking reductions” to which this proposal refers, is to reductions in *minimum* parking requirements for individual properties, so that multi-unit housing residents could be forced to instead park on Woodside Park streets. However, actual *increases* in parking areas on each lot “may be provided if the owner or builder considers that necessary.” (AHS Recommendations, p. 26). It is reasonable to believe it highly likely that a builder would

consider additional parking pavement to be “necessary,” in order to accommodate the multi-unit housing’s extra drivers and autos, thereby further reducing the property’s greenspace.

In addition, the planning staff recommend that properties directly fronting on either of Woodside Park’s proposed Growth Corridors (Georgia Ave. or Route 29), be allowed a new “Attainable Housing optional method (AHOM),” defined as an “optional method of development for medium scale attainable housing, including multiplexes, small townhouses and stacked flats up to 3 stories tall....” (AHS Recommendations, p. 25).

The combined potential effect of the conversion of Woodside Park into a Priority Housing District with two Medium Scale Attainable Housing borders, would be to fill any Woodside Park property with increased population, housing, and vehicle density, at the consequent cost of diminished greenspace, air quality, climate “resiliency,” privacy, quiet, and nature habitat, in Woodside Park. That is not an effort to “improve environmental quality.”

III. Thrive Montgomery 2050 Is Primarily An Urban Development Proposal Extended to Non-Urban areas.

A. TM2050’s Claimed Environmental Agenda

The draft Thrive Montgomery 2050 makes some effort to convince readers that one of its three “overarching objectives” is to “use growth and development to create places that...improve environmental quality,” and to create “environmental sustainability” and “environmental resilience.” (TM2050, pp. 7, 16). The plan boldly declares:

Thrive Montgomery 2050 builds on the tradition of robust protection of the natural environment. It proposes a series of strategies to mitigate the effects of climate change and minimize pollution.

(TM2050, p. 17). Furthermore, it promises that its proposals will

...improve the environmental sustainability of growth by encouraging infill and redevelopment to curb sprawl and bring areas built out in an era of little or no environmental regulations up to robust standards for stormwater management and other state-of-the-practice environmental standards.

(TM2050, p. 32). Central to the plan’s land use philosophy is the concept of “efficient use of the land.” (TM2050, pp. 29, 36).

If we fail to make efficient use of land, the available space for growth, outdoor recreation, agriculture and natural resource conservation will rapidly diminish. (TM2050, p. 29)

...Among the most clear-cut benefits of the efficient use of land, including compact corridor-focused growth together with reinforcement of the rural pattern outside of the corridors, is to make development more environmentally sustainable...and to reduce greenhouse gas emissions in particular.” (TM2050, p. 38).

Therefore, the plan states that it will pursue its list of proposed policies and practices “in order to maximize the efficiency of land use and public investment.” (TM2050, p. 32). Synonymous with such “efficient use of the land,” according to the draft plan, is high density or “compact” development in general, and in particular Missing Middle Housing:

The environmental benefits of dense, walkable neighborhoods dovetail with the increasing preference...to live in walkable places served by mix of uses and amenities. (TM2050, p. 17)

We must encourage compact, infill development and redevelopment to accommodate anticipated population growth in a way that supports dense...communities. (TM2050, p. 34)

More particularly, according to the draft plan, Missing Middle housing requires less land, and is therefore efficient; and the zoning that will enable it will “limit the development footprint on the environment.” TM2050, pp. 106, 107.

In summary, while the draft plan promises a “series” of strategies to mitigate the effects of climate change, in reality the plan’s “environmental resiliency” boils down to one or two strategies:

(1) rezone large areas of the county in order to “urbanize,” with higher density housing and with any increased parking development deemed necessary by real estate developers, any single family detached housing property on designated “growth corridors,” and/or within specified distances from such corridors and from rail transit stations; and

(2) redevelop areas with “high proportions of impervious surface cover,” by “a compact form of infill development...(which)...can reduce stormwater runoff and heat island effect by using green infrastructure, green roofs, and other green cover....” (TM2050, p. 38). This latter strategy has no application to Woodside Park, but seems primarily intended for redevelopment of places such as abandoned malls and their parking lots.

These two main strategies, it is promised, will

- (1) “mitigate...climate change and minimize pollution” from autos (p. 7);
- (2) “improve the environmental sustainability of growth” (p. 32);
- (3) “create spaces that improve environmental quality” (p. 7)
- (4) reduce reliance on driving (p. 16)
- (5) reduce stormwater runoff and heat island effects (p. 16).

In terms of land use policy, this emphasis on land use “efficiency” is simply an expansion to the urban arena of a many decades old land use policy debate originating from the arena of federal land use policy. It pits the utilitarian “wise use” policy pioneered by Gifford Pinchot, against the “preservation” philosophy pioneered by John Muir and the environmental restoration philosophy pioneered by Aldo Leopold. The advocates of “efficiency” and “wise use” of land have a long record of damaging the land with their “efficient” and “wise” use of it, and there is little reason to believe that the result will be very different in the urban or semi-urban arena. Certainly, the

plan's proposals to "efficiently" develop the greenspace of Woodside Park will damage or destroy more of it, as the experience of other areas demonstrates.²

B. TM2050's Primary Agenda

The primary agenda of TM2050 is an "urbanism" that will accommodate predicted middle class population growth and housing density desires in Montgomery County areas close to transit stops or "growth corridors" that the Planning Board wants to become "urbanized." "Urbanism" is its principal objective and "organizing principle," and development in general is its comprehensive focus, as it even recommends developing the Agricultural Reserve for uses other than farming." [TM2050, p. 20 (Urbanism; Elrich Memorandum, p. 6 (development of the Agricultural Reserve for multiple uses). The purported "crises" it principally confronts are those of future population growth and the desire for housing in certain designated areas, not the climate crisis (or racial or income equity). However, we acknowledge and applaud the Board for its parallel or secondary motivation to reduce or avoid sprawl and automobile emissions, and encourage mass transit use. These are important efforts as a matter of general principle, at least for the shorter term.

Indeed, the draft plan's effort to shepherd housing density and population growth close to transit and growth corridors does reflect an important general principle of climate action in the shorter term, while the automobile industry is still predominantly based on the internal combustion engine. Increased reliance on mass transit and reduced reliance on internal combustion engine vehicles is essential in the short term, to help arrest climate change. However, it seems likely that the implementation of the proposed zoning changes and the building of new higher density housing will not even begin for a number of years. By the time the first such housing construction is completed, the automobile industry will likely be well on its way to full electrification; renewable energy must constitute a much greater share of utility energy production; and massive shifts to electric vehicles will likely be forced by the increasing pace and intensity of environmental disasters caused by climate change. This shift to electric vehicles will also be accelerated by the fact that electric vehicles will become economically competitive with, and actually less expensive to operate, than fossil fueled vehicles. With the conversion of automotive transportation to electric vehicles and/or other non-fossil fueled vehicles, and the conversion of power plants to renewable energy sources, the relevance to climate mitigation of automobile use, and of proximity of housing to mass transit, will be reduced and eventually eliminated. This must happen well before 2050, or the planet is cooked. Put simply, the plan's heavy reliance on reduced automobile use and housing proximity to mass transit as climate mitigation measures, is likely to become less relevant and less successful as a climate mitigation measure by the time it is implemented, and thereafter.

Given this likelihood, or at least this possibility, the plan's use of zoning changes to encourage higher density housing near transit, as a mechanism for achieving climate mitigation and environmental quality, should clearly function primarily as a short-term general principle for

² <https://youtu.be/jEJ8tfplZcs>

selective application, rather than a generally applicable, one-size-fits-all mandate that is imposed regardless of the environmental damage it will cause to individual neighborhoods. In this respect, the draft TM 2050 appears to have it backwards: it proposes that these general principles are the long term plan to guide the next 30 years of development, and that the short term, real climate actions are in the Climate Action Plan. Indeed, after devoting pages of text intended to persuade readers that the draft plan has proposed a “series of strategies” to mitigate climate change, the draft Plan at the end appears to throw up its hands and admit that it is merely “a high level document that focuses on long range planning to guide the physical development of the county” (TM 2050, p. 134), and is not really a climate action plan. As the Board explains, it is in another planning document that real climate action is proposed:

The [Climate Action Plan] recommends specific actions to be taken in the near term to achieve the goal of eliminating greenhouse gas emissions by 2035 and to mitigate or adapt to (climate effects).” (TM2050, p. 134).

The Board’s decision to largely omit from TM2050 any major climate mitigation efforts besides its proposals for high density zoning changes in select locations, is a major flaw in a planning document purporting to constitute the County’s planning “vision” for the next 30 years.

1. TM 2050’s Multi-Unit Housing Plan Will Not Improve Environmental Quality, Minimize Pollution, or Mitigate Climate Change’s Effects, in Woodside Park

The draft plan completely fails to acknowledge the environmental, social, and economic costs of creating higher density housing in a heavily landscaped neighborhood of single family detached housing. It fails to acknowledge that increasing housing density as it has proposed will necessarily and intentionally eliminate greenspace. It fails to acknowledge that with the reduction of greenspace it is very likely there will come reduction in tree canopy, and that with loss of tree canopy will come decreased local climate resiliency, and possibly increased home energy costs. It fails to acknowledge further that with loss of greenspace will come reduced stormwater retention and greater stormwater runoff, flooding, and water pollution. It fails to acknowledge that the call for sidewalks in areas without them may result in significant loss of tree canopy, private conservation landscaping, and stormwater retention, in areas in which there may be no compelling community demand for sidewalks. It fails to acknowledge, and appears not to care, that with loss of greenspace will come loss of nature habitat. It fails to acknowledge that with increased density will come increased vehicular traffic from the increased number of automobiles, and increased local air pollution from that added traffic. It fails to acknowledge that with increased population density, there will come increased waste storage and disposal requirements. It fails to acknowledge that with increased housing density will come a reduction in privacy. It fails to acknowledge that with increased housing density will likely come increased noise and light pollution.³

³ See also: <https://americas.uli.org/190808scorchedrelease/>; [Heat Mitigation - ULI Americas](#)

Rather than acknowledge these potential costs, the plan essentially implies or asserts that denser housing development entails all benefits and no costs. Thus, a plan that proposes to eliminate greenspace and deplete natural habitat claims that it “builds on the tradition of robust protection of natural resources.” (TM 2050, p. 17). And the plan asserts that there is no tradeoff between development and land preservation, we can simply have both:

[I]ntensely developed centers of activity and preservation of land both play a vital role... but...neither pattern can exist without the other. (TM2050, p. 30)

The assertion that preservation of land “cannot exist” without intense development is simply fanciful, wishful thinking when applied to the individual property owner’s decision whether to increase the density and extent of development on the property. In that context, development destroys preservation.

Conversely, the draft plan fails to acknowledge the benefits that single family detached housing bring to homeowners in Woodside Park. Among these benefits are more privacy, reduced noise and light pollution, reduced vehicular traffic, and cleaner air.

To the extent that the respective environmental costs of its proposals have simply been ignored rather than expressly addressed and weighed, the plan appears to be a governmental exercise in greenwashing.

IV. Conclusion

The undersigned respectfully request that the following actions be taken to address the procedural and substantive shortcomings of the draft Thrive Montgomery 2050:

1. As requested by County Executive Elrich, TM 2050 and the AHSI should be separated and the Planning Board should stop work on elaborate rezoning proposals until a final version of TM 2050 has been enacted by the Council.
2. As suggested by County Executive Elrich, TM 2050 should include a recommendation for the county to study merging all functions of the development approval and permitting process under one agency.
3. As partly suggested by County Executive Elrich, TM 2050 should abandon its large scale, blanket rezoning proposals, and/or provide for small, context-sensitive plans such as Small Area Planning (SAP), and/or a Climate Conservation Overlay Zone, that would provide the opportunity for more customized climate conservation and mitigation strategies that require a balancing of the environmental costs and benefits of increased housing density, and that can provide an exemption from higher density zoning or

appropriately limit the nature and extent of increased density housing, in neighborhoods with significant greenspace or other natural resources, such as Woodside Park.

4. As suggested by County Executive Elrich, TM 2050 should include substantive and direct actions to enhance environmental resilience, and mitigate and prevent climate change
5. Develop and refine clearer, more objective “compatibility” standards for guiding rezoning decisions.

Respectfully submitted,

Michael J. McClary and Frith C. Crandall