

Review of the Draft Thrive Montgomery 2050 Master Plan

Cloverly Civic Association

July 9, 2021

The Cloverly Civic Association Position on the proposed Thrive Montgomery 2050 Master Plan

Key Points:

The Cloverly Civic Association opposes the creation of a Master plan where *Urbanism is the organizing principle*.

The Cloverly Neighborhood Center needs to be removed from the list of urban sites on the Thrive Montgomery 2050 Growth diagram

The Thrive 2050 Plan needs a Natural Environment Section giving environmental guidance including a thorough environmental study and impact statement.

Background

This review was developed by Cloverly residents to identify how the Thrive Montgomery 2050 General Plan would impact the Cloverly Planning area. Cloverly Civic Association members support the principle that each planning area's residents play a major role in developing their local master plan. The General Master Plan should be broad enough to give guidance a diverse set of alternatives from urban, suburban, rural, to agricultural. The Cloverly community supports the Cloverly Master Plan that was approved with strong buy-in from a diverse number of groups from the many ethnic, racial and socio-economic backgrounds in Cloverly. Residents have chosen to live here because of the rural appearance of single-family homes, the residential character of the Cloverly community, and to take advantage of the robust natural environment of Cloverly. Rather than ignore the natural environment the Thrive Plan should offer guidance to strengthen support of single-family homes and residential character that protect the natural environment.

Oral Testimony

Montgomery County Council Hearing on Thrive Montgomery 2050 on June 29, 2021, at 7:00 PM

My Name is Quentin Remein representing Cloverly Civic Association, and reside in Cloverly

Council Members thank you for the opportunity to speak.

The purpose of creating the 1964 Wedges and Corridor plan was to protect rural areas from “urban chaos”. Under this original plan, Cloverly protects the environment and provides housing, retail, parks, and worship spaces for a vibrant and diverse community with a rural appearance. Thrive Montgomery’s plan, which proposes making Cloverly an area for urban development, is directly against the Cloverly Master Plan. As the leader of the Cloverly Civic group, I am representing residents from all different backgrounds who value Cloverly and join together to protect against changes to this important ecological, social, and racially balanced area.

Homes are nestled in the forests of Cloverly. Trees protect the air we breathe, cool the streams that support aquatic habitats, and tame the increasing deluges of stormwater. The Paint Branch Special Protection Area protects the aquatic habitats. Rural cluster zoning protects the drinking water in the Duckett Reservoir. Large lot residential zoning protects the headwaters of the Northwest Branch, which prevents flooding downstream to the Anacostia River and pollution into the Chesapeake Bay.

Cloverly also has a positive social and racial history - home to freed slaves who settled in the area in the 1700s, freed in 1844, and given land by Quakers. Becoming landowners in this community is a foundation for their realization of freedom and racial equity. These residents have partnered with the community to protect the environment that would not be possible under the Thrive Plan.

The Thrive Plan supports urbanism, but it also needs to protect the environment and a rural/suburban lifestyle. The Thrive Plan needs to be more balanced to provide greater protection to the environment, watersheds, habitats, stormwater management and support racial equality in our rural communities.

Thank You

PREVIOUS MASTER PLANS

In order to better understand the current proposed plan, it is helpful to look back to understand how we have arrived here. The Master Plan process began in 1964 with the idea that urbanization was happening at a tremendous rate and that a planning process was needed to control development. Development needed to be balanced with highways, new communities, school systems, redevelopment, park and recreation expansion, rapid transit, and so on... (page 11 *"...on wedges and corridors, a general plan,"* MNCPPC, 1964). *Wedges and Corridors* started with urban development and looked at how the urban ring related to rural patterns and public services. Then *Wedges and Corridors* looked at how control of the plan could be put into effect through zoning, tax policies, subdivision controls, park, and open space acquisitions, etc. These controls became the Action items, which were part of the plan.

The 1969 Update to the Plan increased housing, protected farmland and rural open space, and expanded parkland in the Wedge. In 1993 the General Plan Refinement added flexibility in implementation by not imposing rigid objectives based on what people wanted and also added environmental constraints. The plan added the requirement to balance jobs with housing. Balancing the two can lead to shorter commuting distances, sharing of the local tax burden, and moderates housing costs, while imbalances lead to traffic congestion, higher taxes, higher housing prices, and shortages of services such as education and other County services. The 1993 Plan deals with the following issues: Land Use, Housing, Employment/Economic Activity, Transportation, Environment, Community Identity, and Design, and Regionalism.

While encouraging continued growth in the Urban Ring, the General Plan Refinement seeks to preserve the flourishing neighborhoods already located there. The Refinement encourages the County to protect these areas from the encroachment of non-conforming land uses, from through traffic, and from excessive noise. It seeks to maintain and reinforce the many desirable community features that are common in the Urban Ring.

The General Plan Refinement encourages the protection of environmentally sensitive areas throughout the County. In the Urban Ring, environmental protection frequently means rehabilitation or retrofitting. As knowledge about the importance of enhancing and maintaining air quality, water quality, and other natural resources increases and as new technologies become available for this purpose, public and private efforts to better care for the resources in the Urban Ring are essential. Cleaning up streams, managing stormwater runoff, modernizing parking lots, and planting street trees are a few of the activities that can offer great rewards.

Review of the Thrive Montgomery 2050 Plan Proposed to the Council Comments to the Introduction Section

The Thrive Plan Introduction (page 3) states four reasons why the new plan is needed. They are the following:

1. inequitable investment between the eastern and western part of the county,
2. reliance on automobiles,
3. zoning 1/3 of the county for single-family homes,
4. and racial discriminatory land use.

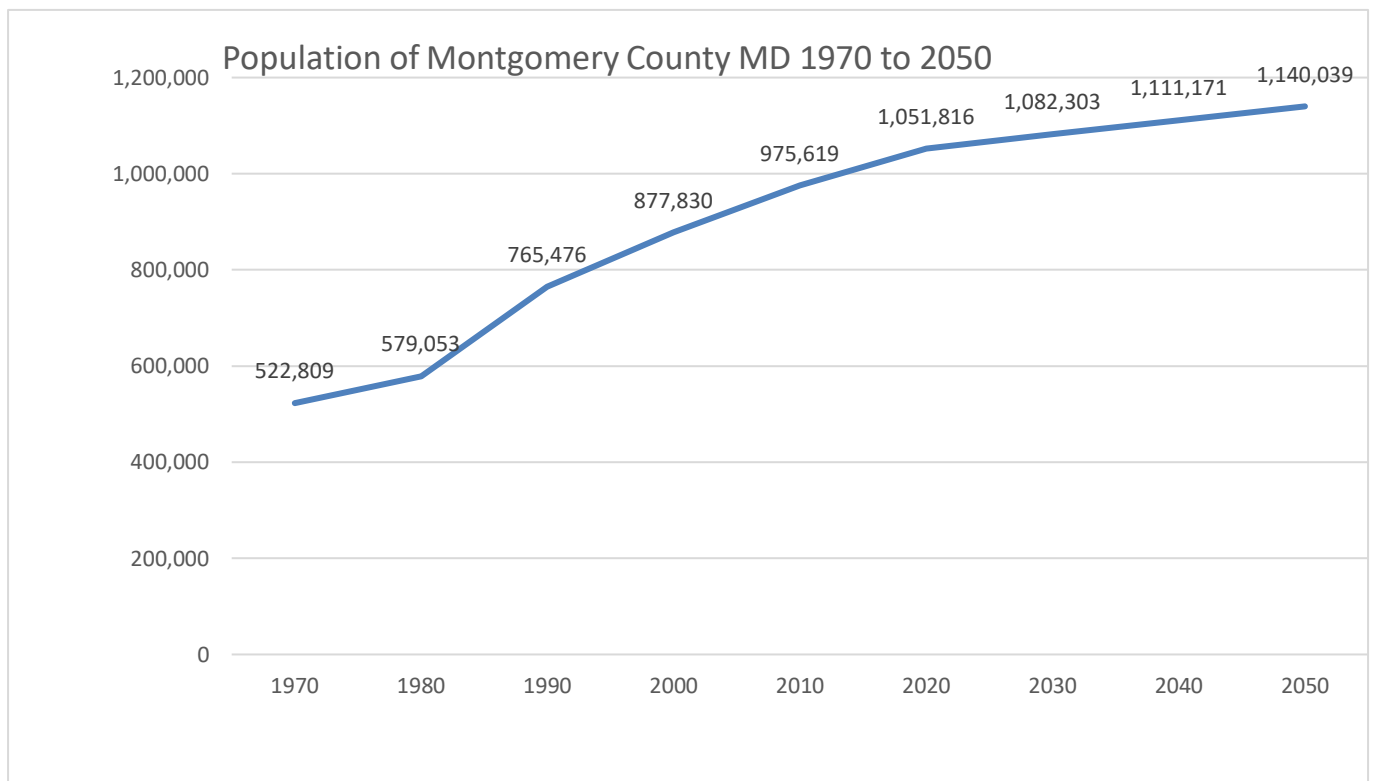
All the shortcomings listed were already overcome by the previous Wedges and Corridors Plan. Some residents have chosen not to rely on automobiles, but most choose to keep their automobiles. The government has failed to provide mass transit that is more appealing than the automobile. Automobiles are relied on because residents chose to use the automobile. If people are forced not to use their automobiles, inequity is the result as the wealthy will find a way to use their automobiles while the poor will not. (page 3) Under the Wedges and Corridors Plan, zoning was approved to add denser residential use in commercial areas and Sector Plans have increased urban zoning for many areas of the county such as Wheaton and White Flint. The legacy of racial and economic inequality is, for the most part, something of the past. Our problems as a county are national; slow population growth makes attracting businesses difficult and increased housing costs contribute to the housing shortage. Other jurisdictions that we compete with also grapple with aging populations, greater diversity, and changing traditional family arrangements. Montgomery County also has traffic, education, and problems providing services that contribute to problems attracting businesses and new residents. Any current problems cannot be changed or reversed by the Thrive 2050 Plan.

The Wedges and Corridors Plan created complex jurisdiction with major employment centers, urban hubs, mature residential neighborhoods, and rural landscapes that we have today. The Wedges and Corridor Plan even does a better job of addressing climate change and could be amended to solve more problems.

Plans do not control development; they only serve as guidelines. Thrive does not specify how certain areas of the County would be developed. The plan may encourage development in one area but residents and developers make the final decision on where and what type of development is made. Wedges and Corridors Plan has already accomplished many of the goals envisioned by the Thrive Plan.

The Thrive Plan does not address the issues of our changing society with issues of solutions to worldwide climate change, greater pandemic impacts to urban areas, and technological improvements such as 5G communications and electric cars changing the way we live and travel. With so many changes being made, the issues being addressed by the Thrive Plan will either no longer be issues in the future or the Thrive Plan will be taking us in the wrong direction.

The Thrive population graph on page 4 is misleading since the annual population growth rate from 2011 to 2019 goes from 1.6% down to .21%. The following chart shows that the population forecasted growth, recalculated based on a reduced growth rate, **would not be 200,000 but only 88,000**. If the rate continues in this direction population growth would go lower or even negative. According to census numbers recently released so far, some national jurisdictions have lost Congressional legislators because of the falling population in some areas of the US. Accurate numbers from the 2020 Census should be available before a new master plan is approved. Montgomery County needs to be planning for a population they can provide services. The County already is struggling to provide educational and other services to its children and citizens, traffic fills our roads, and Metro and other transit are running at capacity. Zero growth needs to be considered. Page 34 repeats the concerns for population growth of 200,000 over 30 years.



Thrive Plan (page 6) The data was checked for the Cloverly planning area. Many of the unconstrained areas were actually constrained. For example, a large property to be used by a church, part was constrained and another part was unconstrained. Properties in flood plains were listed as unconstrained.

Economic performance and competitiveness

Thrive Plan (pages 7-11) seems to say that the County's economic performance and competitiveness would be best served if the elderly would move out of the County. Placing our economic performance and competitiveness shortcomings on our elderly is not justice.

Racial equity and social inclusion

Thrive Plan (pages 12 – 16) discusses some of the history and current occurrences of racial inequality. This information is not needed in the plan, which should only address today's concerns for racial equity and to what extent the plan impacts that racial equality and social inclusion issues.

Environmental resilience

Thrive Plan (page 16) identifies the groundwork done by the Wedges and Corridors Plan in the protection of streams, forests, and trees. Will this be continued in Thrive 2050?

URBANISM AS THE ORGANIZING PRINCIPLE

The Thrive Plan states (page 20 & 23): "Thrive Montgomery 2050 applies the principles of urbanism – a term this plan uses as shorthand for a set of ideas about what makes human settlements successful – to guide their future growth... Thrive Montgomery 2050 is a blueprint for creating a community that offers equitable access to jobs, affordable housing, transportation, parks, and public spaces. Just as importantly, it can help point the way to using the design of the built environment to strengthen the social and physical health of our residents, supporting active lifestyles and encouraging interaction and engagement. This vision builds on the Wedges and Corridors plan, with a greater emphasis on the development of compact, complete communities and the role of corridors as places to grow, while preserving natural resources and the Agricultural Reserve. It is designed to integrate arts and culture into the fabric of our community and open opportunities for creative expression."

This statement incorrectly states that it is building on the Wedges and Corridors plan when it is actually in opposition to this plan by placing urbanism above different lifestyle choices such as suburban, rural, and agricultural.

The whole purpose for creating planning and the Wedges and Corridor Plan in 1964 was to control urbanism. The introduction of the Wedges and Corridor plan states:

"WHY ...on wedges and corridors - a general plan for the Maryland-Washington regional district

The reasons for recommending the Corridor plan as the best plan of development for the Maryland-Washington Regional District are clear-cut.

In this report, we would like to call our readers' attention to the tremendous development that is taking place all along the Atlantic coastal plain from New England to Virginia. and ask them to consider the impacts of that development on the Washington area. Some authorities hold that a single contentious city, a 'megapolis', running from Washington north to Boston, is already in the process of formation. Perhaps this is a slight exaggeration; perhaps not. Certainly, there is enough evidence that this may be the case to make everyone realize that a *laissez-faire* attitude towards metropolitan area development is no longer tenable—neither in the District of Columbia and its environs. nor in any other urban complex in the eastern United States. Too much is at stake." *on wedges and corridors, a general plan for the Maryland-Washington regional district, page 11*

The Thrive plan goes to urbanism as the guiding principle, just what the 1964 Plan wanted to avoid - urbanism. The Thrive plan will weaken the 1964 controls on urbanism such as zoning, tax policies, subdivision controls, park, and open space acquisitions, etc.

COMPACT GROWTH

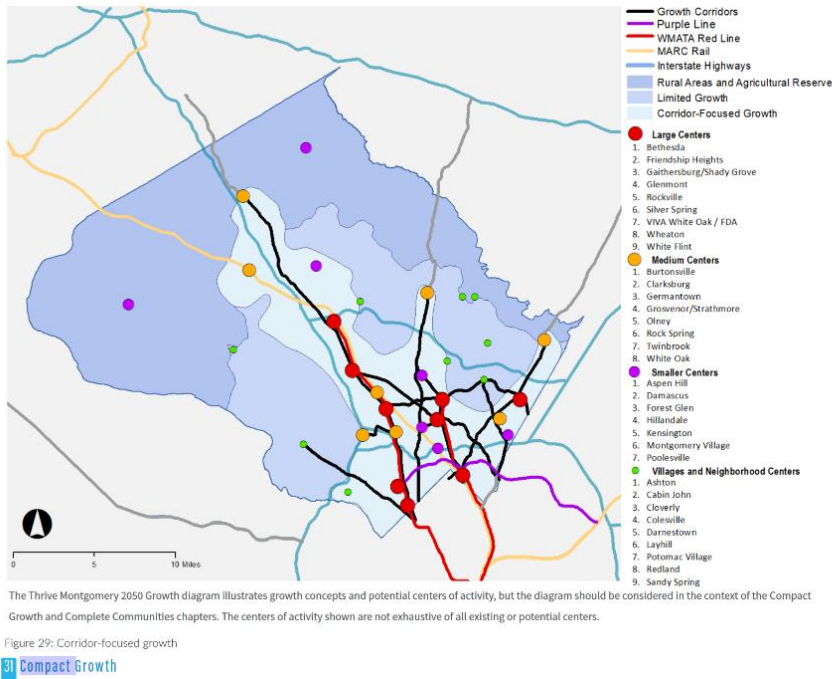
Thrive Plan states (page 28): “While the Wedges and Corridors Plan was visionary in recognizing the consequences of sprawl and the value of land preservation, subsequent land use and transportation planning decisions did not always adhere to the 1964 plan’s guidance, illustrating the political economy of sprawl.” Ignoring the guidance of the plan and the zoning recommendations that followed from the Wedges and Corridors Plan has been a problem that has accelerated with recent Planning Boards.

Thrive Plan states (page 29): “The result is that many people who live outside what became the Agricultural Reserve are unfamiliar with it and have limited opportunities to visit, enjoy and develop an appreciation for the value of continued preservation of land for farming, recreation, and environmental stewardship.” With annual County Fairs and annual opportunities to visit our farms, this is untrue. We cannot expect our farmers to work their farms and provide a 24/7 tourist experience too. Our farms provide food and other agricultural goods for us. If the urban population wants “opportunities to learn about the county’s rural heritage, eat and drink locally produced food and beverages, and participate in outdoor activities such as hiking, biking, camping, and fishing (as stated in Thrive),” we need to look to our parks for these opportunities. In our urban areas, citizens have no idea what is going on in those businesses. We cannot hike through businesses like our banks, investment companies, medical labs, etc. Many of them have security to keep the public out of urban businesses such as in Silver Spring and Bethesda. The Agricultural Reserve has not been established as a recreational area or a special area for more environmental stewardship than the rest of our county. The Agricultural Reserve was established to protect agriculture!

The word “environment” is used 65 times in the plan but only in a few instances refers to the protection of the natural environment which includes the following: animal, bird, fish, insect, and microorganisms habitat, vegetation, streams, soil, rocks, atmosphere, and climate. In the Thrive Plan, the “natural environment” is mentioned only in the Thrive 2050 Plan sections dealing with agriculture and parks. The natural environment needs to be protected in all sections of the Plan because an uncontrolled urban community can destroy the natural environment anywhere in the plan area. We often think of air pollution, but it also includes water pollution, stormwater runoff, heat pollution, pesticides, noise, congestion, etc. Almost all the references to the environment involve the manmade environment, and the plan is only concerned with negative impacts that only directly impact mankind. More often man is indirectly negatively impacted by a lack of protection from the problems created in the natural environment.

The Thrive Plan states (page 30) that “Thrive Montgomery 2050 proposes a recommitment to concentrating growth in downtowns, town centers, rural villages, and intensively developed centers of activity, or nodes, along major transportation corridors to maximize the efficient use of land and create Complete Communities.” However, urbanism has a natural tendency to spread. As one area becomes more highly populated the adjoining areas become more attractive for growth and more heavily populated. As Wedges and Corridors states: “we need controls on urbanism to avoid urban sprawl.”

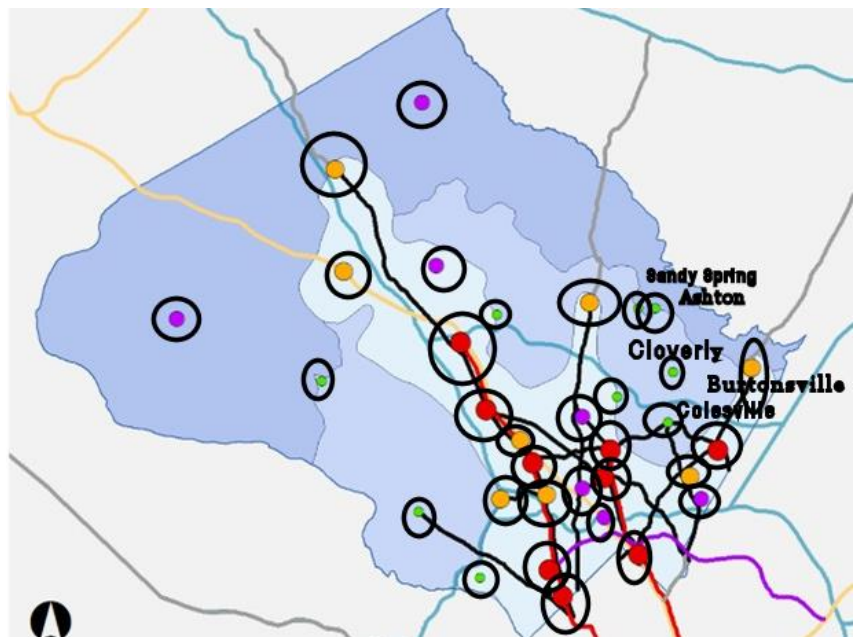
Remove Cloverly Neighborhood Center from the list of urban sites.



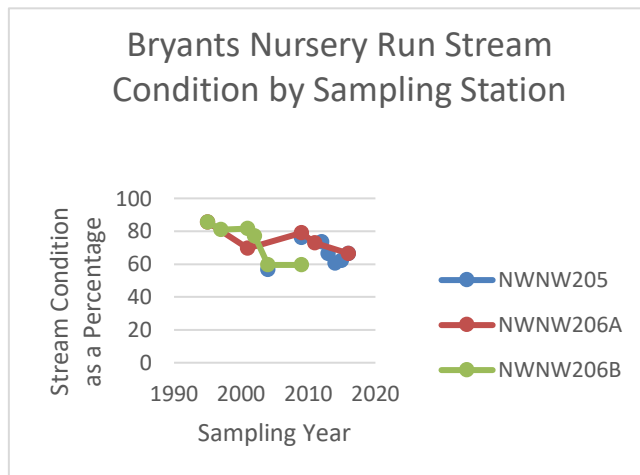
Cloverly Neighborhood Center is listed on the map on page 31 as a site for concentrated urban development. Also, the following nearby potential urban areas are listed: Colesville, Ashton, Sandy Spring, and Layhill, along with Medium Centers of Burtonsville and Olney. The addition of all these sites could create a large urban area in the middle of suburban and rural communities. For example, Ashton, Sandy Spring, Cloverly Colesville are located within several miles from each other. The proximity of all these proposed urban areas is urban sprawl.

Remove Cloverly from the list of urban sites.

Cloverly consists of highly sensitive environmental areas that are not compatible with urban development. Cloverly sits at the headwaters of the Northwest Branch on the western side, the Paint Branch Special Protection Area (SPA) on the eastern and southern sides, and a protected area for drinking water in the Duckett Reservoir on the northern side. Previous development of a shopping center in Cloverly has already damaged the environment of Cloverly's streams and habitat. Portions of the Paint Branch watershed experienced considerable environmental stress as a result of development activities. In 1997, the solution to this damage was to create the County's first special protection area to protect the watershed, control erosion, and protect the habitat. An impervious limit of 8% exists in the special protection area to protect the environment. DEP's evaluation of the eleven tributaries from 1994 to 2020, shows that 2 remain fair, 2 went from excellent to good, and 5 remain good. DEP's summary states that "Results of the SPA monitoring in the Upper Paint Branch SPA show that stream biology scores have slowly declined within the Paint Branch SPA since monitoring began." The headwaters of the Northwest Branch with highly erodible soils are protected by RE-2 (2-acre zoning) to control development. Along New Hampshire Avenue there exists an area of



seeps and springs. The only development that has occurred since 1997 is the development of churches using the PIF policy for approvals. The impervious limit for the area as stated in the Cloverly Master Plan is 10% to 15%. DEP's review of February 2021 stated, "The portion of the Northwest Branch watershed that is within the Cloverly Master Plan boundary has an imperviousness level of 15.4%. New large churches are proposing up to 28% additional imperviousness on 15-acre sites. Areas planned for additional commercial development have not been developed because of highly erodible soil conditions. The overall result has been stream damage, erosion, loss of trees along the streams, and loss of aquatic habitat. An example is shown of a stream bank along Bryants Nursery Run, that has eroded leaving a bank greater than 15 feet that is located behind Crimson Spire Court.



A DEP review of February 2021 shows that the quality of the stream has deteriorated from 95% in 1995 to 60% in 2016. DEP concluded that as of 5 years ago "While Bryants Nursery run isn't a pristine stream, the fish and benthic macroinvertebrates indicate it is a healthy and functioning ecosystem."

Urbanization of the Cloverly shopping area, increasing housing density, increasing the overall imperviousness would destroy the environment and habitat of the UpperPaint Branch and Upper Northwest Branch watersheds, and pollute our

drinking water.

Compact Growth Policies & Practices (pages 32-34) This section could be improved by eliminating the references to activity corridors and dealing with any urban centers. The following changes are recommended (underline is add and ~~crossed out is delete~~):

- Concentrate growth in urban centers ~~of activity along corridors~~ through compact, infill development, and redevelopment to maximize efficient use of land.
 - ⊖ Amend land use, design, and zoning regulations, including the Zoning Ordinance ~~and Subdivision Regulations~~, to remove regulatory barriers ~~and permit corridor focused compact development~~. ~~Appropriate densities will vary but should be sufficient to support, at a minimum, the efficient provision of transit service along these corridors.~~
 - Improve the environmental sustainability of growth by encouraging infill and redevelopment to curb sprawl and bring areas built out in an era with little or no environmental regulations up to robust standards for stormwater management and other state-of-the-practice environmental standards.
- In urban areas promote and prioritize public investment ~~in infrastructure along growth corridors~~ and leverage it to attract future private investment in a compact form.

- Adopt new methods of financing public infrastructure, such as value capture, tax increment financing, and other mechanisms to facilitate investment and provision of appropriate infrastructure in areas identified as appropriate for more intensive development.
- Establish high-quality transit infrastructure ~~along growth corridors~~ through capital investment and ensure reliable, frequent service through operational investment.
- Leverage federal, state, and local incentive programs, publicly owned land, and land investment opportunities for ~~corridor infill development and~~ redevelopment.
- Limit growth ~~beyond corridors to compact, infill development, and redevelopment in Complete Communities~~ by maintaining zoning to prevent sprawl. Apply principles of urbanism at an appropriate scale along a rural-to-urban transect as outlined in the Complete Communities chapter. (Note: This was not found in the Complete Communities chapter)
 - Sustainably manage land ~~outside growth corridors and Complete Communities~~ to increase biodiversity, improve the health of natural habitats, preserve privately owned forests, protect watersheds and aquifers, and improve water quality while providing expanded opportunities for outdoor recreation, including vigorous physical activity.
- Preserve and enhance the Agricultural Reserve and manage the areas designated within the footprint for a rural pattern of development for the benefit of the entire county.
 - Maximize the benefits of the Agricultural Reserve through policies designed to ensure the continued viability of farming as an economically productive and sustainable activity, discourage sprawl, ~~facilitate a broad range of outdoor recreation and tourism activities~~, conserve land and natural resources, and promote practices that advance environmental quality.
 - ~~Improve~~ Maintain access to the Agricultural Reserve for the public to ~~experience and directly benefit from this valuable resource for locally grown food, outdoor recreation, and tourism.~~

The compact growth does not protect suburban and rural communities from urban sprawl but creates urban sprawl in those communities. Compact growth is helpful in large and medium centers. The problem with compact growth is that for it to be successful it would be dependent on the availability of commercial and governmental services to be located in their area. With the changes in marketing commercial product sales, these services are vanishing for many businesses and being replaced by delivery services. This just replaces citizen shopping by automobile with online shopping using a delivery truck, diminish the advantages of compact growth.

The Thrive plan concludes the section on compact growth on pages 35 to 39. The first point is that adding compact growth by increasing building heights in the Georgia Avenue and Route 29 corridors will reduce the disparity with Route the 270 corridors. Compact growth will preserve the agricultural preserve from urbanism so that it can provide “opportunities for locally grown food, outdoor recreation, education, and tourism.” (page 39) The Agricultural Preserve is burdened with providing the outdoor recreation, education, and tourism that are not provided by compact growth. These pages of the plan are repetitive, contradictory, and an attempt to justify making these corridors urban. The Thrive plan needs to preserve green spaces not build them over.

COMPLETE COMMUNITIES

The Thrive Plan for Complete Communities (pages 41 to 53) seeks to significantly expand the amount of land available for communities where all aspects of life are accessible within walking distance and automobiles are not required. With so many diverse interests and needs, and so many providers to meet those needs, getting a community that will provide the right mix for people can be difficult. Most people will choose a location that will provide them the best mix, and then use the automobile to go to places that offer the things their community does not. The retail trend has been that businesses do not have the volume of sales that can keep a business profitable. So residents may need services outside their walkable communities, and businesses may need to rely on sales outside of their walkable communities, both requiring transportation by automobile. Complete communities may not be right for everyone. Some businesses may not be right to be mixed with residential housing. For example, businesses that sell products that can be hazardous. Medical facilities and clinics mixed with housing in the same buildings may be undesirable, especially in a pandemic. In suburban, rural, and agricultural communities' *complete communities* are not feasible.

The level of urban sprawl needed to support the Thrive 2050 Plan vision of these complete communities is enormous and unfeasible. The extent that these complex communities could achieve the objective of all essential aspects of living within walking distance is not a practical idea, and the assumption most people would choose to live in such a densely populated community is not supported by evidence. The plan is an argument for urbanism which always ends with urbanism being the best alternative. People pick the complete community that is best for them when they decide where to live. If you liked soccer your first choice may be a location with a nearby soccer field. Life is a tradeoff, sometimes one person will commute a great distance so that others in the household will be near schools, family members, or something important to another household member. Your complete community will probably rarely be another person's complete community. Often, we find that we have to leave our complete community to go to other areas. These other areas may not offer rapid transportation alternatives, so we are left with cars. Many new opportunities are now available so that we can telecommute to work, churches, visit friends, attend social and special interest functions, etc. Many times people live in a community that was not their first choice and adapt to the lifestyle that the community offers. Arguments for what is the ideal "Complete Community" are pointless.

DESIGN, ARTS & CULTURE

The Thrive Plan for Design, Arts, & Culture (pages 56 to 74) contains a large portfolio of good ideas for living. Balancing the ideas with form, practicability, and high cost is a problem of this approach. Also, many of the ideas conflict with each other. Providing templates for streetscapes add uniformity but restrict ingenuity and freedom of expression.

The Thrive 2050 gives the following guidance (pages 64 and 65), "In order to maximize the contributions of design, arts, and culture toward creating strong communities with lasting value, the county will pursue the following policies and practices:

- Use .design-based tools to create attractive places with lasting value that encourage social interaction and reinforce a sense of place.
- Promote design strategies and retrofits to make new and existing buildings more sustainable and resilient to disruption and change.
- Support arts and cultural institutions and programming to celebrate our diversity, strengthen pride of place, and make the county more attractive and interesting."

Implementing these policies may be interesting and desirable to one person and unwelcome to another.

TRANSPORTATION AND COMMUNICATION NETWORKS

The Thrive Plan on Transportation and Communication (pages 76 to 90) contains an overview of the traffic problem. The analysis assumes that the mass transit system would eliminate the traffic issue. The problem seems to be always with us. Before we had Metro in the Washington, DC area traffic was intolerable. Some things improved with Metro and people adapted to using Metro. If Metro was important, people lived near it. If something else was more important, people commuted by car or used some other type of transportation or combination of methods. Then it became apparent that Metro could no longer handle the heavy use so we adapted. Now telecommuting is an option, so many will adapt again. The Thrive Plan does take away options from people who do not prefer an “urban” lifestyle.

The county will base its efforts to improve connectivity on the following policies and practices:	Cloverly Civic Comment
Develop a safe, comfortable, and irresistible network for walking, biking, and rolling	
<ul style="list-style-type: none">Expand the street grid in downtowns, town centers, transit corridors, and suburban centers of activity to create shorter blocks.	Expanding the street grid facilitates urban growth in downtowns but encourages urban sprawl to spill over into suburban and rural areas.
<ul style="list-style-type: none">Stop planning or constructing new highways or major road widenings for cars.	If there is more transit some areas would not be impacted, but denser living in suburban and rural areas may not be able to exist without widening the roads that were planned to be widened.
<ul style="list-style-type: none">Convert existing traffic lanes and on-street parking to create space for walkways, bikeways, and street buffers with landscaping and street trees.	Providing walkways, bikeways, and street buffers would likely necessitate widening the corridor by removing buildings. Already bikeways suffer from having adequate bike paths in some areas but inadequate lane width in other areas.
<ul style="list-style-type: none">Prioritize the provision of safe, comfortable, and attractive sidewalks, bikeways, roadway crossings, and other improvements to support walking, bicycling, and transit usage in capital budgets, development approvals, and mandatory referrals.	Most existing sidewalks, bikeways, roadway crossings have been built too close to automobile traffic lanes to be considered safe, comfortable, and attractive by their users. Correcting these problems will take more land and reducing and tearing down urban buildings.
<ul style="list-style-type: none">Transform the road network by incorporating complete street design principles to eliminate all transportation-related roadway fatalities and severe injuries and support the emergence of more livable communities.	Going to other means of transportation may be as dangerous as cars when alternative transportation traffic becomes more intense, with higher speed bicycles and rolling vehicles moving with slower forms of transportation.

The county will base its efforts to improve connectivity on the following policies and practices:	Cloverly Civic Comment
Build a world-class transit system.	
<ul style="list-style-type: none"> Build a network of rail, bus rapid transit, and local bus infrastructure and services that make transit the fastest, most convenient, and most reliable way to travel to centers of economic, social, and educational activity and opportunity. 	A transit network will only move people at the pace of the slowest vehicle. The most reliable means of transportation may not be the most economic. Proposed changes may actually result in slower and less economical transit.
<ul style="list-style-type: none"> Convert existing general-purpose traffic lanes to dedicated transit lanes. 	Transferring an automobile traffic lane may reduce the number of people transported. Making many long stops to take on and discharge passengers may be less efficient than automobiles. Studies are needed to verify what would be most effective.
<ul style="list-style-type: none"> Connect historically disadvantaged people and parts of the county to jobs, amenities, and services by prioritizing investments in increasing access to frequent and reliable all-day transit service. 	Disadvantaged people may require cars or individualized transportation. Increasing the frequency of transportation may be cost-prohibitive. Many people need to use their cars to perform service jobs such as plumbers, electricians, maintenance workers, cleaning workers, home health care workers, etc.
<ul style="list-style-type: none"> Ensure safe and comfortable access to transit stations via walking, rolling, and bicycling. 	Increasing safety for sidewalks, bikeways, and rolling will involve making each one of these safe for a higher number of users. Sidewalks will include runners, fast walkers, and slow walkers. Bikeways will include expert fast-moving electric bikes going up to 50 mph, while most urban bicyclists go 7 to 20 mph, which could produce hazardous situations in heavy traffic. Electric scooters average around 12 to 20 mph. People using rolling, and bicycling will always find ways to increase their speed. More speed and more traffic equal more serious accidents.
Adapt policies to reflect the economic and environmental costs of driving alone.	
<ul style="list-style-type: none"> Employ pricing mechanisms, such as congestion pricing or the collection and allocation of tolls to support walking, rolling, bicycling, and transit 	Negative pricing mechanisms only hurt those not able to pay, many of whom are minorities. Those able to pay will continue to use cars if they are faster.
<ul style="list-style-type: none"> Manage parking efficiently by charging market rates and reducing the supply of public and private parking. 	Negative pricing mechanisms only hurt those not able to pay, many of whom are minorities. Those able to pay will continue to use cars if they are faster.
<ul style="list-style-type: none"> Encourage the proliferation of non-polluting vehicles by upgrading government fleets and requiring appropriate infrastructure 	While it would be ecologically wise to upgrade government fleets to electric vehicles, would government employees be using walking, rolling, bicycling, and transit like the rest of the population?

Communication Networks

The Thrive Plan only discusses digital infrastructure in one short paragraph. This topic needs to be expanded in how it relates to the other aspects of the plan and how telecommuting influences transportation. This is a large topic for the present time that has a great impact on our urban area that is not addressed.

AFFORDABLE & ATTAINABLE HOUSING MORE OF EVERYTHING

The Thrive Plan goes through a long demographic analysis. The analysis may be true but the conclusions are not. The statistics are generally the same for the whole country, so this is not a problem just for Montgomery County. The rate of population growth is declining, the population is getting older, percentages of minority populations are increasing, and households are decreasing in size. We do not need to prepare for growth faster than the national population is growing. See the earlier population chart that shows a population growth that is less than half of what the plan projects. For some reason, we need more dense and diverse housing. Again the housing shortage is a nationwide problem and may be caused by external factors, such as investors investing in housing making more rental units available, and driving up the cost of housing for purchase. Another factor is that surrounding counties have more available land to build more housing. Do we need to give up single-family homes which may be the more desirable housing? If there was an oversupply of single-family housing in neighborhoods, that might be a consideration. Making the population denser will take away a reason that people are moving into the county and keeping the population less dense is more desirable.

PARKS AND RECREATION FOR AN INCREASINGLY URBAN AND DIVERSE COMMUNITY: ACTIVE AND SOCIAL

This section deals with urban parks. This section could be shortened. We do need urban parks, but there is no advice on how urban parks are going to be created.

The following section deals with the natural environment that needs to be expanded and brought into the whole Thrive Plan discussing covering climate change as well:

“Maintain high standards of environmental stewardship in park management and operations

- Reaffirm the Parks Department’s commitment to resource conservation, stewardship, and sustainability practices such as innovative stream and habitat restoration projects.
- Selectively acquire additional land where needed to protect sensitive natural resources, improve water quality, increase tree cover, enhance wildlife corridors, curb invasive species, and achieve other environmental goals.
- Create a resiliency plan to improve the ability of park and recreation facilities and natural resources to withstand the effects of climate change.” (page 122)

CONCLUSION

The conclusion (pages 137 to 138) provides a lot of good information on the purpose and relationship of the plan to functional and area master plans. The action plans are too brief to be very useful in guiding the implementation of the Thrive Plan.

WHAT IS MISSING

The purpose of the Wedges and Corridors planning process started in 1964 was to control urbanism from taking over or to prevent urban sprawl. Thrive 2050 is to make urbanism the organizing principle. Thrive 2050 takes down the barriers to urbanism, such as zoning and others. Thrive 2050 is not flowing out of Wedges and Corridors but is overturning Wedges and Corridors. What is protecting the successes of Wedges and Corridors? One of the greatest accomplishments of Wedges and Corridors is natural environmental protection. Thrive 2050 does not protect the natural environment. The chapter on the Environment that was removed was very small. A chapter on the environment is needed and needs to be connected to the issues of climate control. The second success of Wedges and Corridors is a robust residential area with a lot of diversity with many types of housing. Protecting suburban and rural housing is not even mentioned in the Thrive Plan and needs to be added.

For urbanism, there are new trends that need to be incorporated into the plan that are important.

- One is the importance of the workplace. Many people have multiple living venues. One is their home and the second is their workplace. With advances in technology and the Covid pandemic, we have discovered that many people can work at home. This has a great impact on urbanism in our area with many workers finding out that they can perform their work at home.
- The second is the idea of the advantages of dense living. Many people dislike dense living and studies have shown that increased density can cause increased crime and decreased mental health.
- The third is the staging from an automobile-centric society to a walking, rolling, bicycling, transit-centric society. What and when will improvements be made to sidewalks, bike paths, and transit. Also, while the Draft Plan focuses on equity, it does not consider the many senior citizens, handicapped, or young families who are not going to take public transit, bike, or walk, particularly in inclement weather, to meet their day-to-day needs. Is this just accomplished in the urban zones or does it occur in the suburban and rural zones?

Montgomery County has traditionally used the master & sector planning processes where there are hearings and reviews to focus on the objectives and needs for a specific area and to allow for more resident input and buy-in. The county ranges from rural areas to urban centers and any one-size-fits-all approach by definition fails to adequately take into consideration local conditions. Using the master & sector planning processes can help ensure essential and accurate analyses of housing objectives; that roads schools, sewers, water, stormwater management, are available to support increased residential density; and taxes and financial resources are available to pay for any upgrades in government services. This process may slow down the process but will result in a better solution for the government and residents.

The plan lacks conciseness that it can be used as a guide that everyone could clearly understand. Terms like vibrant, desirable, effortless, delightful, irresistible, easy, convenient, practicable, can be interpreted in many ways. The plan is very repetitive and wordy, repeating concepts over and over. The plan reads like an infomercial rather than a strategic plan for development that needs to be followed. The plan is the plan; it does not need to be sold to its users.

The changes in the Master plan are immense. The Public Hearing draft in November 2020 represented many changes made between the planning staff and the Planning Board. The changes made by the Planning Board for the Council Hearing draft were significant. One can not place the plans next to each other and easily follow the changes. Listening to the testimony at the hearing residents had a much different understanding of what the plan said. Many people commented that they did not have adequate time to understand the plan. All these issues determine the quality of the final plan.

As a county, we need time to review before going forward with this plan.

APPENDICIES

A. Division of Environmental Protect Updates for the Cloverly Planning Area

1. Northwest Branch Watershed
2. Paint Branch Special Protection Area

- A. Montgomery County Department of Environmental Protection Updates for the Cloverly Planning Area
 - 1. Northwest Branch Watershed

Claire Iseli (County Executive's Office) has provided a set of questions resulting from a resident's complaint about excessive stream erosion along a part of Bryants Nursery Run, a tributary of Northwest Branch, in Cloverly. This is an excerpt of this discussion relating to development in the Bryants Nursery Run and the Northwest Branch

Claire Iseli's Questions and Draft Agency Responses

1. Are our hands tied because the watershed has not yet reached the 15% cap?

M-NCPPC: Most capped areas are implemented on a property-by-property basis. In the case of Bryants Nursery Run, the Master Plan did not specify implementation, only that this watershed should remain within 10 - 15% imperviousness.

2. Can we institute lower caps for certain sub-watersheds like this one? If yes, what would that look like? If no, why not?

M-NCPPC: When it is clear that water quality goals are not being met by current policies, new caps may be implemented, typically with an overlay zone.

3. What's the imperviousness in the Bryants Nursery subwatershed compared with the watershed as a whole?

DEP: DEP delineated a relatively accurate drainage area for the Bryants Nursery Run subwatershed. Based on this and the most recent available data on impervious surfaces, the Bryants Nursery Run subwatershed is 11.4% impervious. There are two branches feeding the mainstream – the north branch is 11.7% impervious and the south branch is 11.8% impervious.

M-NCPPC also has calculated impervious surfaces in the Bryants Nursery Run watershed using a slightly different watershed boundary. Their impervious calculation appears to be very similar to the one that DEP calculated independently. In the staff report for the Hill Farm subdivision application, M-NCPPC reports an imperviousness level of 11.66% in the Bryants Nursery Run subwatershed. However, this number also includes the proposed RCGG Jesus House, Mar Thoma, and Snowden's Manor proposed developments. Also including the Hill Farm development would bring the imperviousness level under their calculations to 11.72%.

According to DEP calculations, the Northwest Branch watershed that falls within Montgomery County has an imperviousness level of 20.7%. **The portion of the Northwest Branch watershed that is within the Cloverly Master Plan boundary has an imperviousness level of 15.4%.**

4. How has it changed in the past several years?

DEP: Based on quick a visual analysis of past aerial photography, it does not appear that there have been significant changes in imperviousness in the past 10 years. The most recent noticeable additions to imperviousness occurred between 2004 and 2008. These were an expansion of parking for Peoples Community Baptist Church off of Norwood Rd and new housing on Crimson Spire Court also off of Norwood Rd.

The most significant addition of imperviousness was around 2002, with the extension of Norbeck Rd between Norwood Rd and New Hampshire Ave. Additionally, the Hampshire Green golf course and housing development occurred roughly around the same time. Prior to these two developments, the 1998 Countywide Stream Protection Strategy identified Bryants Nursery Run as having an imperviousness level of 7%.

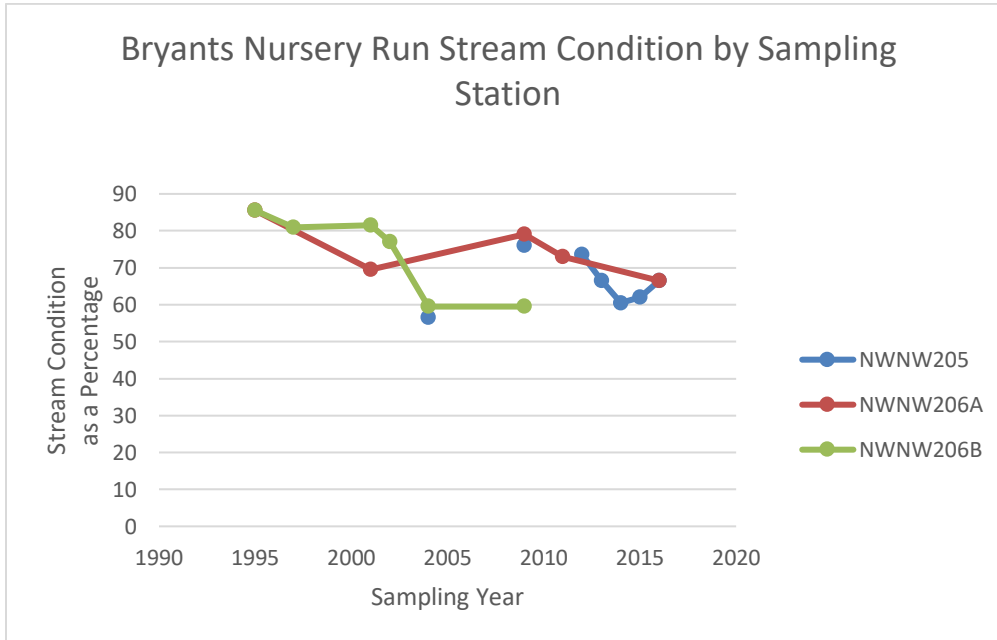
M-NCPPC: Imperviousness in this subwatershed was between 5-8% in 1990 (page 88 and 112, Cloverly Master Plan).

5. How has water quality changed?

Biological Monitoring

DEP: Montgomery County DEP monitors fish and benthic macroinvertebrates to assess stream health and water quality. Fish and benthic macroinvertebrates are subject to the full array of conditions presented throughout the year and exhibit varying tolerances to human disturbance. Since they are present through all the full array of water quality and habitat conditions, they provide an excellent indicator of stream health. DEP has been monitoring the Bryants Nursery Run tributary since 1995. Over the past 25 years we have collected nearly 40 biological samples from three stations along that tributary. To interpret the data that was collected, fish and benthic macroinvertebrate samples were analyzed using the appropriate index of biotic integrity (IBI). The output scores from the IBIs were then combined on an annual basis to generate the “stream condition” for a given year.

Water quality in the Bryants Nursery Run tributary has generally remained in the “Good” stream condition range. The most downstream sampling location has exhibited a slight decline in condition from 1995-2009. However, sampling that station overlaps the culvert for Norbeck Road, and likely isn’t representative of watershed conditions. The most consistent sampling location falls immediately below the stream restoration and has maintained “Good” stream condition from 1995 through 2016. While Bryants Nursery run isn’t a pristine stream, the fish and benthic macroinvertebrates indicate it is a healthy and functioning ecosystem.



A. Montgomery County Department of Environmental Protection Updates for the Cloverly Planning Area

2. Paint Branch Special Protection Area

1.0 Introduction

The Upper Paint Branch SPA was established in 1995 in response to growing concerns over protecting stream health. In July 1997, an environmental overlay zone was established to prohibit certain land uses and limit impervious surface to 10% for new development and certain expansions of existing developments. In 2007, the environmental overlay zone was amended to reduce the impervious limit to 8% on new development. This amendment was put into effect in response to the growing amount of scientific data available to support that increased imperviousness was a driving factor in streams with impaired biological and physical conditions. A number of capital improvement projects have since been completed to improve the management of stormwater runoff from previously developed areas and curtail further decline of select areas of habitat through stream restoration.

Many areas contained within the Upper Paint Branch SPA were largely developed prior to designation as a SPA. The older developments received little or no stormwater management consideration during construction. Several long-term studies conducted within the Upper Paint Branch watershed in the 1980s and 1990s indicated that certain portions of the watershed were experiencing considerable stress as a result of development activities. Despite the impacts to the watershed, stream conditions in the early 1990s were still good to excellent and supported a naturally reproducing brown trout population.

Results of the SPA monitoring in the Upper Paint Branch SPA show that stream biology scores have slowly declined within the Paint Branch SPA since monitoring began. Stream temperatures have remained fairly consistent since 2012, but stream habitat scores have continued to decline with general decreased scores observed for Instream Habitat Structure, Embeddedness, Sediment Deposition, and Riparian Buffer Quality. Since 2012 the benthic IBI scores have continued to decline at most stations and although the fish IBI scores have remained relatively stable (and even improved in two stations within the Good Hope and Left Fork tributaries) the trout population within the Upper Paint Branch has steadily dwindled. .

The results of BMP monitoring within the Upper Paint Branch SPA suggest that the use of SWM devices can be effective in reducing certain pollutants. The SWM devices generally perform well for storms that do not exceed their designed capacity. Figure 1 shows the location and status of the 15 monitoring projects that are currently being tracked by DEP. Fourteen projects in the Upper Paint Branch SPA completed monitoring prior to 2021. Edgewood Inn completed the pre-construction monitoring requirements in 2012, but no further development activity has occurred at this property; thus, it remains in the pre-construction phase.

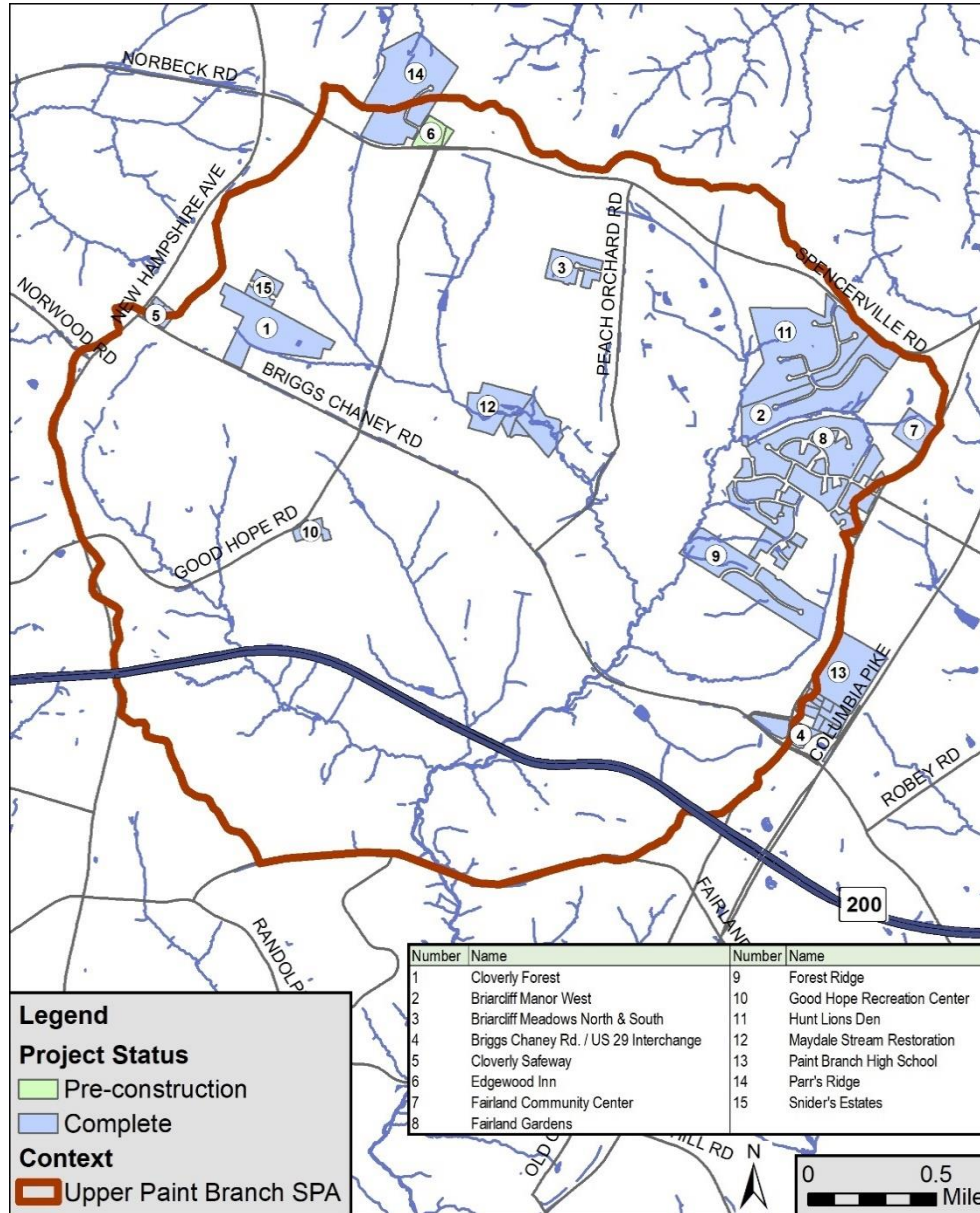


Figure 1. Status of the monitoring for development projects within the Upper Paint Branch SPA as of 2020.

1.1 BMP Monitoring

No BMP monitoring has been conducted at the Upper Paint Branch SPA since 2019. The Cloverly Forest development (aka Anselmo property) was the last major project to be completed in the Paint

Branch SPA. Monitoring requirements at this project were satisfied in March 2019 through the payment of a fee in lieu of conducting the required post-construction monitoring.

The last project required to collect BMP monitoring data in Paint Branch was Briarcliff Meadows, which was completed in 2012. Data collected at this project showed that the one biofilter which was monitored performed exceptionally well during smaller storms where no flow left the facility, but results were widely varied during larger events. For both the biofilter and the sand filter, sporadic net export was observed at both structures. The net exports were thought to be associated with atmospheric dry-fall or fertilization of plantings in and around the SWM structures during the spring months. Groundwater monitoring at this project showed little change in groundwater levels before and after development. One well located downgradient of the sand filter showed an increased response and dampening effect on seasonal elevation highs and lows. This supports the idea that SWM is promoting groundwater recharge in that location. This conclusion is supported by similar trends observed in data collected at locations within the other SPAs.

1.2 Stream Characteristics

Monitoring of stream characteristics consisted of ongoing water temperature monitoring and geomorphic assessments. The results of each of these study components are presented below.

Water Temperature

Data collected through 2016 show that annual average stream temperature trends have remained consistent since 2007. Stream restoration and land development in the SPA did not have apparent impacts on stream temperatures, as of 2016. The Piping Rock Tributary location has been the warmest location in the Gum Springs and Good Hope watershed since monitoring began there in 2010, with no discernible effects on temperature from the restoration that occurred from approximately 2012 to 2013. The Wembrough Tributary (Station PBLF101) temperatures were the lowest in the Left Fork watershed since 2011, including the start of construction at the Cloverly Forest development in third quarter of 2014. Temperatures in the main stem have remained stable since 2006, with water temperatures cooling slightly before leaving the SPA.

Generally, average stream temperatures were higher in the headwater tributaries than in corresponding second order streams, except for Wembrough Tributary (PBLF101). In 2016, average stream temperatures at the Piping Rock Tributary station were about 1.1°C higher than at the downstream location at the Hobbs Drive Tributary station (PBGH208A). Similar results were seen in 2016 at the other headwater station locations, which have also been disturbed. The increased temperatures in the Piping Rock Tributary (PBGH108) may have been influenced by two SWM facilities in close vicinity to the station. Other factors that may have contributed to increased stream temperatures in the tributaries include legacy development in the catchment or, in the case of Station PBRF117, cleared land in the headwaters.

Stream temperatures between the two upstream and downstream main stem stations (PBPB302 and PBPB305C) differ only slightly. Historically, as water left the Briggs-Chaney area, the cooler water of the Good Hope and Gum Springs tributaries appeared to marginally lower temperatures of the main stem.

Geomorphology

A geomorphology study area was established within the Upper Paint Branch watershed in December 2014. This site, Station PBLF101A1, is co-located with the PBLF101 biological monitoring station on the Wembrough Tributary. The site was selected and monitoring was initiated in response to construction activities taking place at the Cloverly Forest project located immediately upstream. Annual surveys conducted at this site include channel cross section, longitudinal profile, pebble count, slope, and sinuosity. In addition, field crews took photographs of each cross section showing upstream, downstream, left bank, and right bank vantage points. Figure 2 shows a sample cross section from the surveyed reach. Overall this cross section has demonstrated very little change below the bankfull channel since the construction of Cloverly Forest was initiated upstream. Some erosion of the right bank has been observed near the top of bank which is likely due to the deer utilizing this section as a travel corridor.

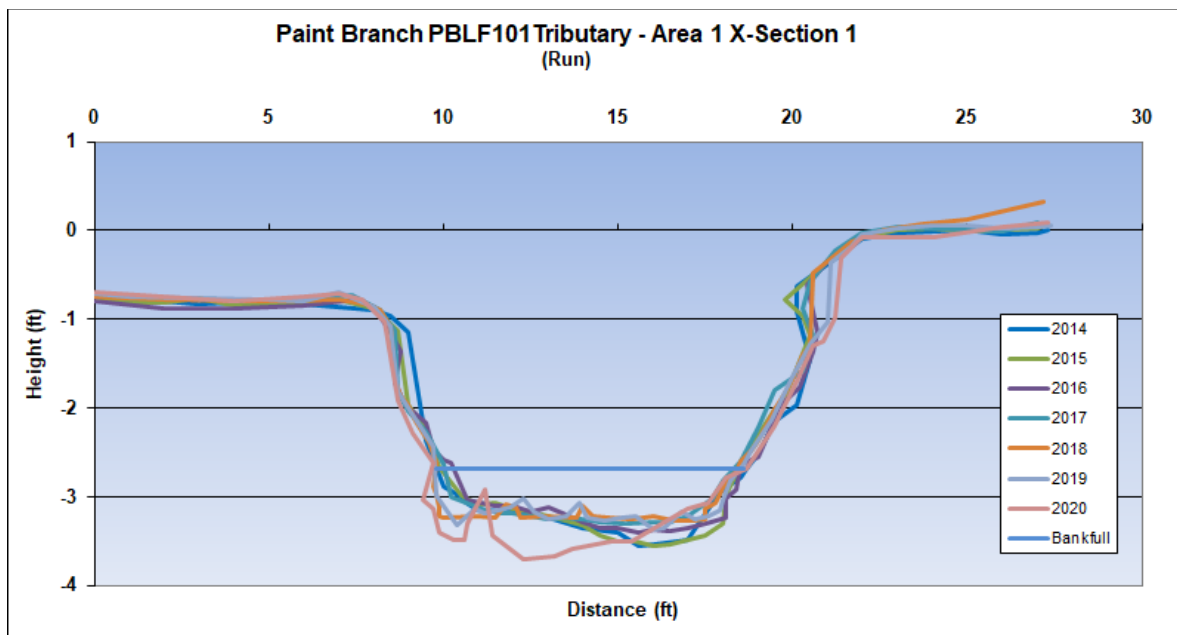


Figure Error! No text of specified style in document.. Upper Paint Branch area 1 cross section 1 (Station PBLF101A1)

1.3 Biology

Biological monitoring has been conducted annually in Paint Branch since 1994. Analysts applied data relevant to fish and benthic macroinvertebrates as biological indicators of stream health. The analysis process uses metrics specific to each community to determine an Index of Biotic Integrity (IBI) score. Analysts converted the index score to a percentage which then qualified the result as in one of four categories: Excellent (88–100%), Good (64–87%), Fair (42–63%), or Poor (0–41%). The IBI analysis process excluded fish from first-order streams that were less than 0.5 square miles in contributing drainage area. Streams that are smaller than this size are often inadequate to support robust fish populations.

Upper Paint Branch SPA stream conditions ranged from Fair to Excellent at the start of SPA monitoring in 1994, based on the narrative rating of combined fish and BIBI scores. Of the eight sites that were sampled in both time periods, in a comparison between the early monitoring period (1994 to 1998) and 2019, only one site declined in narrative by a category and the remaining seven sites had the same rating during both periods surveyed. Figure 3 shows a stream condition assessment at the start of SPA monitoring compared to data collected in 2019.

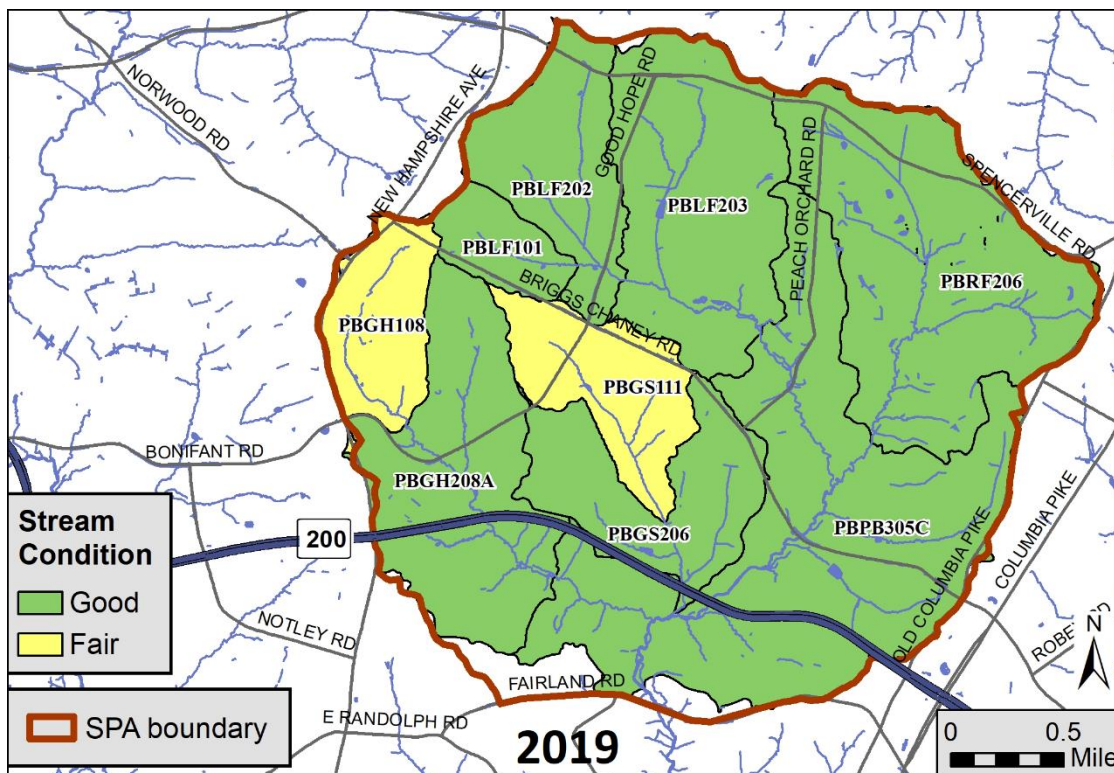
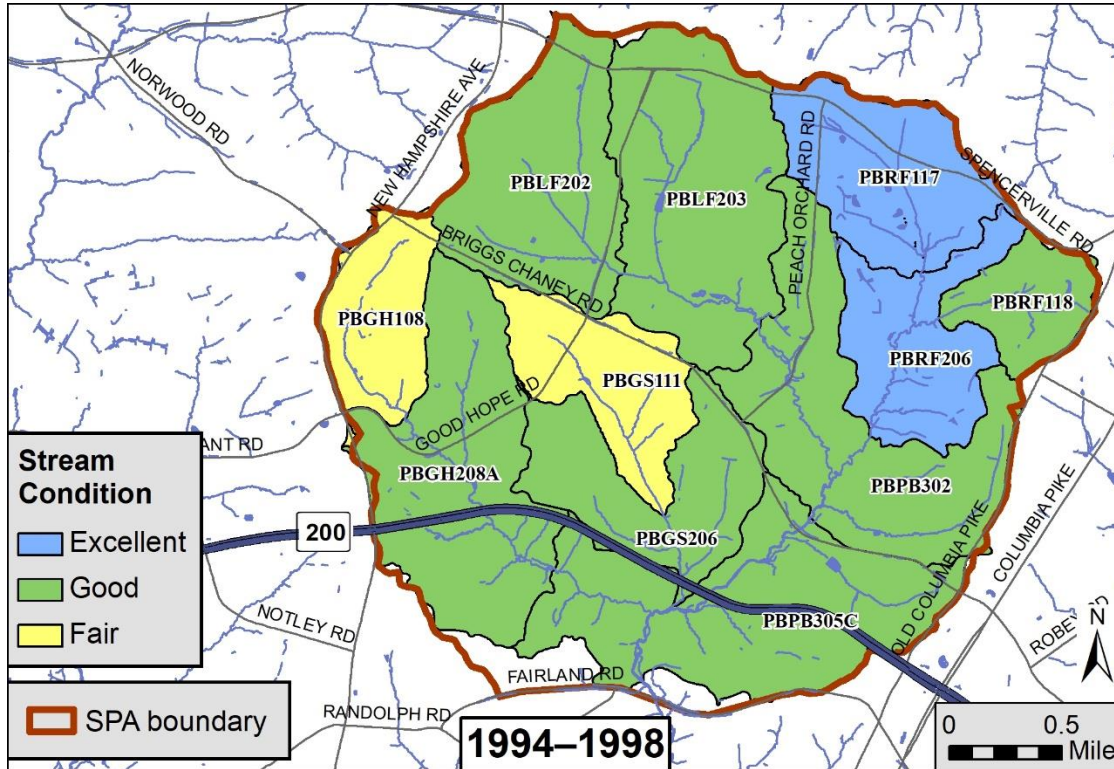
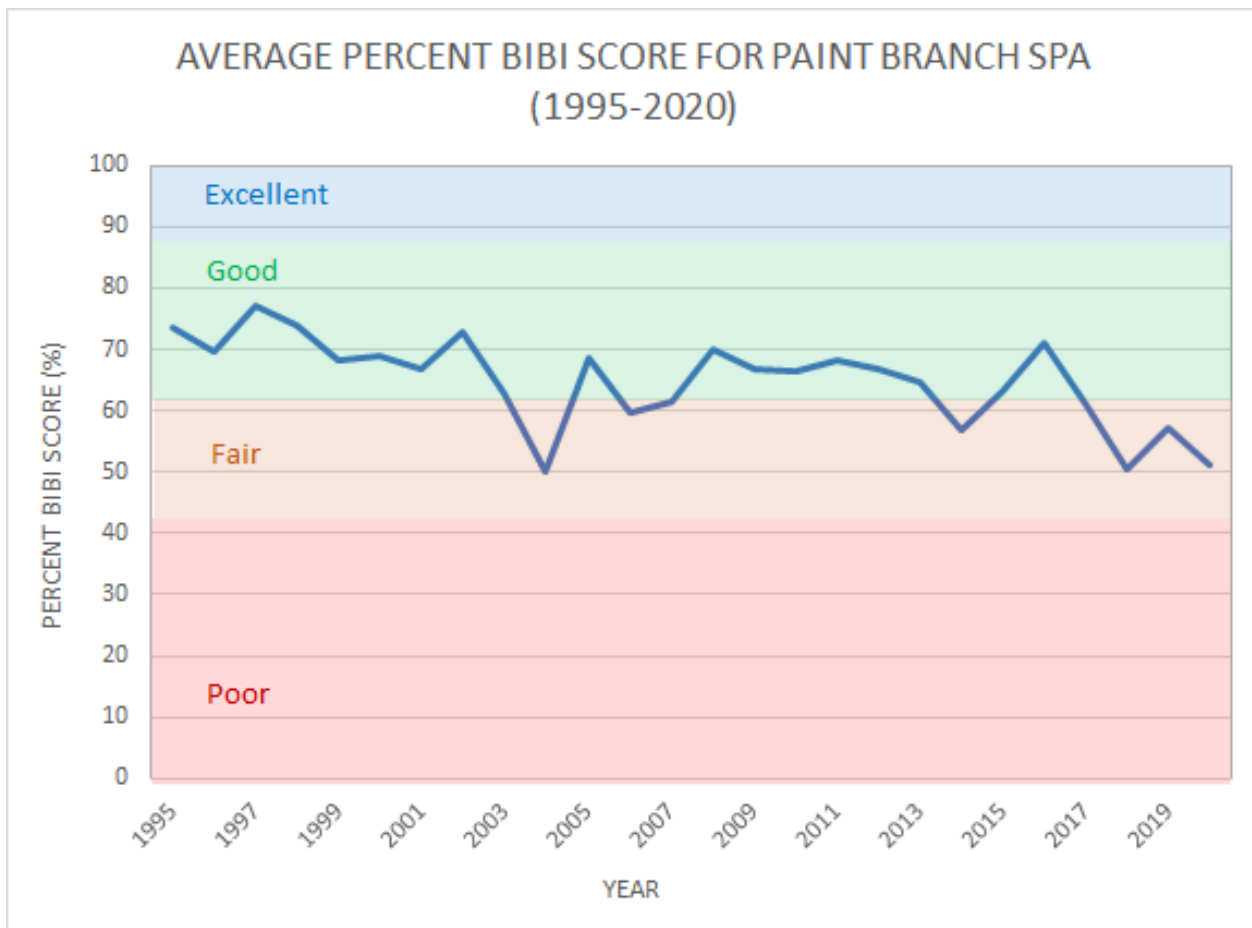


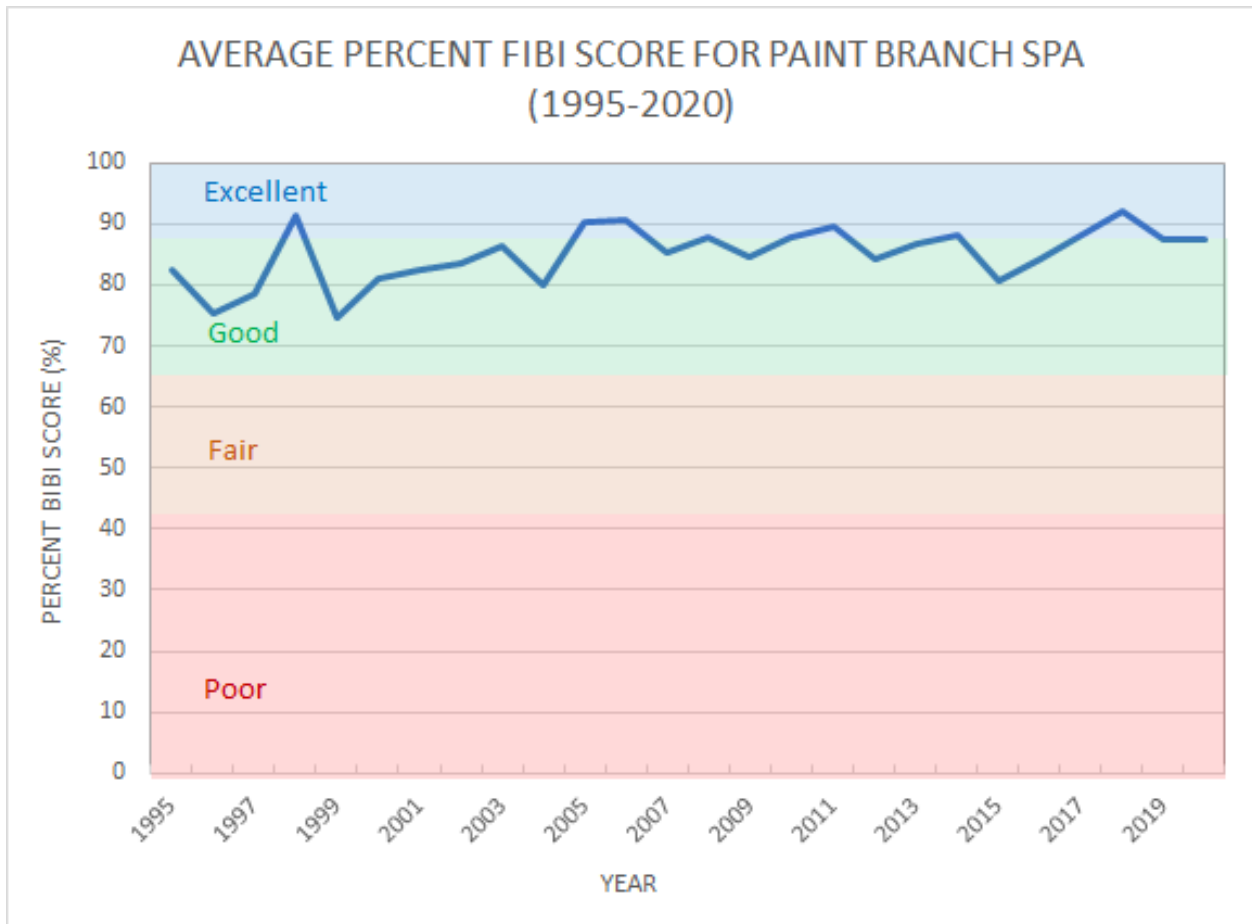
Figure 3. Stream condition assessment within the Upper Paint Branch SPA at the start of SPA monitoring (1994–1998) and in 2019

The benthic macroinvertebrate and fish IBI scores were also analyzed to determine if any long term trends were evident. The average percent IBI score for the SPA stations which were monitored each year was calculated separately using only the benthic scores, only the fish scores, and finally a combined score using all benthic and fish IBI data (Figures 4, 5, and 6). The analysis showed a slight decline in the overall biological community, with the fish community showing much more resilience than the benthic community over the same period of time. One exception to this is the unmistakable change in the numbers of the brown trout found within the watershed. Early studies found good numbers of both adult and juveniles. More recent data suggests that the trout population has dwindled to a non-sustainable population (Figure 7). Focused surveys conducted by the State of Maryland Department of Natural Resources show similar population declines and they have discontinued surveys in the SPA.



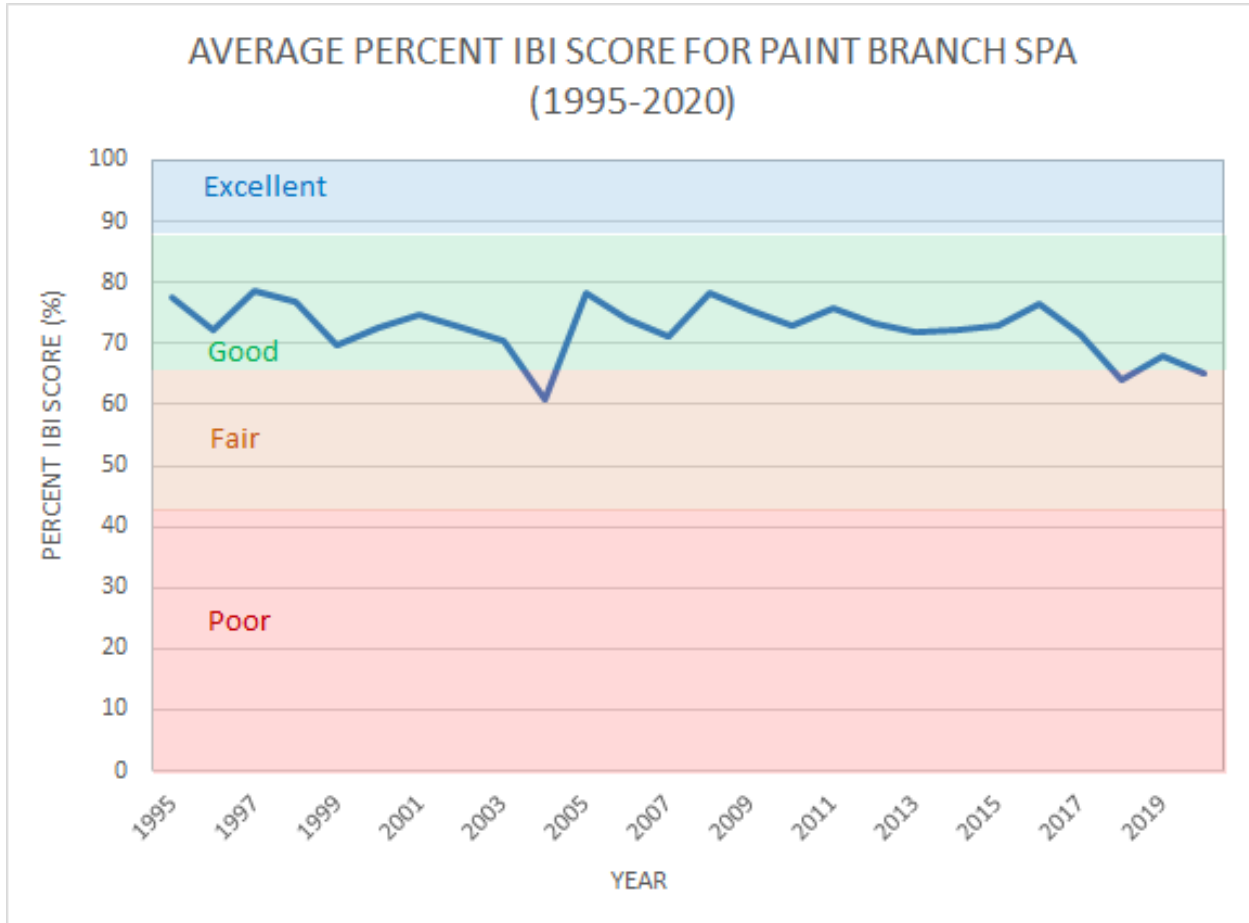
Figure

4. Average percent Benthic IBI Scores by year for Paint Branch SPA Stations



Figure

5. Average percent Fish IBI Scores by year for Paint Branch SPA Stations



Figure

6. Average percent IBI Scores (combined fish and bugs) by year for Paint Branch SPA Stations

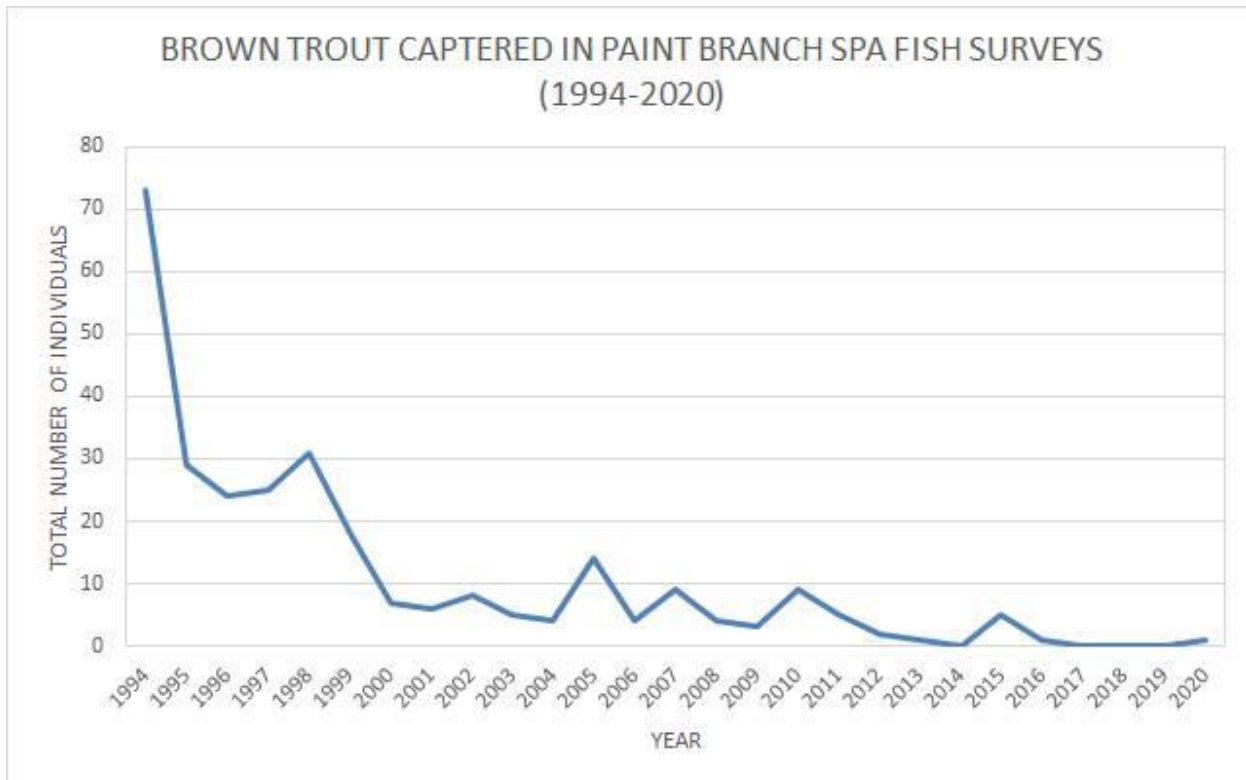


Figure 7. Brown Trout Captured During County Stream Surveys of Paint Branch SPA Stations