Testimony - Montgomery County Listening Session
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Submitted by Donna McDowell

Thrive 2050

My name is Donna McDowell and I have lived in Montgomery County for decades.

Thrive 2050 reminds me of one of those false front Hollywood sets used in Westerns. They look good from the front but there is nothing in the back. That’s what Thrive 2050 is - a facade that will spur an avalanche of overdevelopment. I have nothing against developers (my father was one), but Thrive is a gift to the real estate industry, filled with cash and wrapped up with a bow.

Thrive builds its facade on urban-planner jargon, false assumptions and some outright chicanery.

False Assumption Number One:

False assumption number one: Thrive will lead to attainable housing for low income people. Multiple studies show that the opposite happens. (And we all know this because we live it.) Large-scale infill development results in the replacement of existing housing with much more expensive housing. Two or three million dollar condos replace the smaller bungalows valued many times less, and often occupied by people of color, who purchased the homes decades before. Infill development results in the percentages of people of color decreasing as high income white people replace them. The research directly contradicts the narrative promulgated by Thrive.
The photo above shows an instance of infill development. An existing single family house is on the right; the new residences are multiple condos which sold for over $1,000,000 each.


This article notes that “in much of the country, there is actually no shortage of rental housing. The problem is that millions of people lack the income to afford what’s on the market.” (Nov. 2021)

Additional excerpts indicate, “...for a household earning $20,000, $500 per month is the highest affordable rent, assuming the affordability standard of spending no more than 30% of income on housing. In contrast, the median rent in the U.S. in 2019 was $1,097, a level that’s affordable to households earning no less than $43,880.”

“In fact, there is not a single state, metropolitan area or county in which a full-time minimum wage worker can afford the “fair market rent” for a two-bedroom home, as designated by the U.S. Department of Housing and Urban Development.”
“In other words, even if landlords set rents at the bare minimum needed to cover costs—with no profit—housing would remain unaffordable to most very-low income households—unless they also receive rental subsidies.”

https://www.aprio.com/whatsnext/how-upzoning-is-changing-the-real-estate-landscape-of-u-s-cities/?fbclid=IwAR2MYcdHxRdJ4hy3HrVL-cdCr4q8RYHR7yGlvf8MzFMllhQ21RNKlp6a3Q

This article references “research conducted at The University of Washington found that values of single-family homes with higher neighborhood density had higher values than single-family homes with lower neighborhood density. While the study looks at only one county in Washington, it indicates that upzoning laws could increase property values, as well as property taxes in some states.” (Steven Gluck)

https://ggwash.org/view/82739/why-upzoning-in-gentrifying-neighborhoods-like-langley-park-isnt-always-a-good-idea/?fbclid=IwAR3nYP4hgR2veRM6Gm1eyRuA2pw4RgsWpgtu3Rk8WHW656dxXTWiozu0lgs

Locally, “tenants in Langley Park held a press conference to oppose a Prince George's County proposal to upzone their neighborhood. Langley Park's tenants were joined by CASA, an immigrant advocacy organization.” (Karen Gallagher, October, 2021)

https://nextcity.org/urbanist-news/entry/use-upzoning-sparingly-new-report-suggests/?fbclid=IwAR1hGSBX7dODw54KzjJyFH-ocqsURPan7CBoydAE9j8PYGSZbjPioQtWSc8

This article emphasizes that upzoning should be used sparingly rather than in a blanket approach:

“But what happens when a city takes a blanket approach to development rather than a nuanced one that considers the differences of different neighborhoods? Are the outcomes inherently positive? A new report brings the approach into question.
They found that these targeted rezonings produced a higher ratio of affordable housing to market-rate housing than the city’s average of 19%, whereas any neighborhood-scale rezoning, whether the neighborhood was upzoned or downzoned, produced a lower-than-citywide-average ratio of affordable housing.

“If you just undo that but leave everything else the same, the research is laying out what we know to be true—the same winners and losers in the current market will win and lose based on this.” (Next City, August 31, 2021)

https://africatownseattle.com/articles/0519/is-upzoning-a-downgrade-for-the-black-community.html?

Upzoning has sparked anger in areas in which people of color live.

In Seattle, “upzoning taking homes in poorer Black areas and building new expensive homes that only large white tech workers can afford.

But more accurately, upzoning is a process where in single-family home parcels are being purchased by real estate developers, demolished and replaced with multi-level (high-rise) living units. Picture your neighborhood of homes, perhaps one or two stories – maybe with a basement, and in a matter of months, next door on either side there are eight to 12 unit apartments where a one family home once stood. Sounds, okay, right? In Seattle, living space is much needed and highly competitive – this upzoning could address this issue. However, for Holland – this effort of helping the housing market grow is more sinister than sincere.

‘This program is designed to get rid of people of color, so that White people and tech workers can move in and take our communities’, says Ruby Holland. “If you sell your house you better be prepared, because you may not be able buy another house.”

https://www.planetizen.com/news/2021/02/112307-new-research-effects-market-rate-development-and-upzoning?fbclid=IwAR0Ih7z0-wQ_0puI3ftr1Mfnt3-GM_8UcoXaDqs95gSOpjXi-aq-WIVLtK

This article summarizes the negativities of upzoning in three areas: Portland, Oregon, Minneapolis, and New York City.

Dong: “Upzoning led to higher densities and more development.” (One research article based on analysis in Portland OR.)
Daniel Kuhlmann: “the Minneapolis plan change was associated with a 3% and 5% increase in the price of affected housing units. In addition, there is some evidence that this price increase is due to the new development option it offers property owners. I find that the plan-related price increases are larger in inexpensive neighborhoods and for properties that are small relative to their immediate neighbors.”

Davis: “This paper finds that upzonings are positively and significantly associated with the odds of a neighborhood becoming whiter.” (New York City)

https://www.tonemadison.com/articles/madisons-zoning-debate-is-a-distraction-from-a-meaningful-affordable-housing-strategy?
fbclid=IwAR12Kt3vF7ozfuzf9tPrSyOLa2mEU31XCDmO8b1-bOg33jVCjoKiKc9m58k

This articles notes that, “…upzoning is no replacement for a meaningful and comprehensive affordable housing strategy. In the rush to increase density, even if it is advertised as “good” for affordable housing, we risk hurting the most vulnerable. Instead of making an ill-informed and poor argument that upzoning will reduce displacement pressures for the lowest-income people, Madison could push for clear and bold policies that truly help our rent-burdened population in the midst of a housing crisis in a growing city.

From a scientific research-based understanding of housing markets, the reality is more nuanced than that. Adding luxury units may somewhat impact the demand for market-rate units, but on the lower-priced end of the housing market (where the most demand is), new construction in response to upzoning is likely to increase rents.”

https://48hills.org/2019/01/yimby-narrative-wrong/?
fbclid=IwAR0lizd4OQGqIL6JCoaz2hpaAuH_2cvs_OGRn1bJNQ8HAtYUEbXJ9GEGSkUo

This study challenges the “Yimby narrative,” namely “that higher density in US cities will bring down housing prices.” It “doesn’t work in real life, a dramatic new study from an MIT doctoral student suggests.

In fact, the study, released today, shows that – at least in Chicago, where author Yonah Freemark complied the data – upzoning for greater density leads to increased housing costs.” (2019 - MIT Study)
This article points out that “rezoning that allows for new development can inadvertently drive out low-income residents and local businesses and — with little warning or time to adjust — alter the character of neighborhoods.

‘Jurisdictions are beginning to understand that up-zoning in order to absorb growth has unintended consequences — it increases the value of the real estate and therefore increases displacement pressures,’ says Nora Liu, northwest regional manager for the Government Alliance on Race and Equity, a national initiative spearheaded by the nonprofit Race Forward that is working with jurisdictions around the country to pioneer equitable development strategies."

In Cambridge, MA, critics of upzoning state, “Asking for-profit developers to fix the affordable housing problem is like asking an arsonist to put out their own fire. What is their incentive?

Furthermore, upzoning without strategic government intervention rooted in a community process serves to reinforce the underlying failures of zoning, resulting in further segregation and race and class stratification.”

Progressives are skeptical of “rampant up-zoning of privately owned parcels.” They further note that upzonings are “justified by the specious claim that up-zoning solves California’s house crisis. We just need to “unleash the private sector” by scaling back zoning and environmental laws because they are a drag on developer profits. Then, private real estate investors/speculators will do the rest.”

This article emphasizes the following bogus claims, which I have underscored in my testimony:
“Bogus Claim 2: If/When Up-Zoning Results in Additional Transit-Adjacent Residential Construction, the New Tenants will Suddenly Become Bus and Subway Users

Bogus Claim 3: Up-Zoning will Result in a Glut of New Construction that Drives Down the Price of Housing

Bogus Claim 4: Up-Zoning will Result in Reduced Green House Gas Emissions, Slowing Down or Reversing Climate Change.”

https://stopbtownupzoning.org/2021/07/21/the-penny-drops-evidence-for-upzoning-benefits-is-full-of-holes/?fbclid=IwAR3jDINYzHIHaAHQV7LnxbcZtn74e5QOkasD3MC-XN7kqB02y1FZtQdJ9Fw

Research by the Brookings Institution says this about upzoning: “Full of holes: leads to real estate speculation and gentrification, and that census tract becoming whiter.” (Brookings Institution, 2021)

False Assumption Number Two:

False Assumption number two is that Montgomery County will grow by 200,000 over the next decades. Planning uses this assumption to justify more overdevelopment. Montgomery County actually lost population last year. We are in the midst of an ongoing global pandemic, and people’s work and housing patterns have changed. With remote work, people are moving to more rural areas and to less expensive states. Sure, if you build it, they will come. But the Planning Board is telling us that we don’t a choice, that we have to embrace growth, growth, and more growth. Who says? We, the residents, have a choice. We have moved away from excessive growth in the past, and we can do so again.

Documentation:


Thrive fails to take into account the demographic changes that William Frey, Senior Fellow at Brookings outlines in his recent article. He notes, “…there are other demographic components that have been impacted by the pandemic and hold important consequences for these shifts—a marked downturn in immigration to the U.S. from
abroad, along with well documented reductions in the number of births and rising number of deaths. Changes in each of these components since the pandemic began have affected population growth in much of the U.S., especially in large metropolitan areas and their urban core areas.”

https://harpswellstrategies.com/jacobs-october-flotsam-and-jetsam/?fbclid=IwAR3nYP4hqR2veRM6Gm1eyRuA2pw4RgsWpqtu3Rk8WWHW656dxXTWioz u0lqs

The data show a decrease in the workforce in Maryland.

“…weakness is evident in a couple of important Maryland industries: finance and insurance lost 1,400 jobs in September; and transportation, warehousing, and utilities lost 2,400 jobs. The former is significant because the finance and insurance industry is such an important piece of office demand and is a high value-add industry. The latter is significant because so much of the current demand in the marketplace is in transportation, logistics, and distribution facilities.

On a per capita basis, Maryland seasonally adjusted annual per capita income declined from $74,099 in the 1st quarter to $70,002 in the second quarter.

The overall vacancy rate of 18.8% is relatively high, though the rate of increase so far has been relatively slow. Perhaps more significant/worrying is that the availability rate has increased substantially during the pandemic, and now stands at 25.9%. This indicates that vacancy rates are likely to continue to climb over the next couple of years. Should vacancy rates continue to rise this will place additional pressure on office properties, retail and restaurant businesses…”


“Montgomery County lost thousands of high-paying jobs to neighboring jurisdictions since 2007, says a report commissioned by business leaders and released Friday morning.

Over the past five years, the report adds, Fairfax County outpaced Montgomery in adding research jobs in life sciences — an industry that Montgomery has long touted as a cornerstone of its economic development strategy.”

https://time.com/6051955/work-after-covid-19/

Thrive is based on an outmoded idea about work - that people need to live close-in in order to get to their jobs in the city. COVID has led people to re-examine their work life, and there is a shift to remote jobs in far-flung parts of the country.
“As the postpandemic great reopening unfolds, millions of others are also reassessing their relationship to their jobs. The modern office was created after World War II, on a military model—strict hierarchies, created by men for men, with an assumption that there is a wife to handle duties at home. But after years of gradual change in Silicon Valley and elsewhere, there’s a growing realization that the model is broken. Millions of people have spent the past year re-evaluating their priorities. How much time do they want to spend in an office? Where do they want to live if they can work remotely?

Multiple surveys suggest Americans are eager to work remotely at least part of the time—the ideal consensus seems to be coalescing around three days in the office and two days remote.”

https://www.washingtonpost.com/transportation/2021/05/13/metro-transit-future/

The future of Metro ridership is bleak.

“In the case of Metro, findings released Thursday show nearly 70 percent of pre-pandemic rail commuters are traveling less often to work than before the pandemic— including about 60 percent who are not traveling to work at all. Of customers who rode Metrorail before the pandemic, 2 in 5 are traveling to work at least one day a week, but only half are now taking Metro. Most told the transit agency they drive into work.”

**False Assumption Number Three:**

A huge false assumption (number three) is that Thrive 2050 is good for the environment, and will combat climate change. This is based on the assumption that residents will take Metro. Is this the same Metro that has had decreasing ridership over the past years, with hours cut and stations closed, with cars that are defective, and crime that is rising?

And what about a myriad of other environmental issues completely unaddressed in the Planning Board’s document? Loss of mature trees as infill development changes areas from green to gray, massive amounts of run-off, which have already resulted in the proliferation of “stream restorations,” “restorations” which are really engineered drainage ditches that destroy stands of mature trees and native species. What about our drinking
water - also unaddressed? Attorney General Brian Frosh just last week called attention to deficiencies from lack of inspectors.

What about our air? We already live in an area beset with ozone pollution; infill will lead to more cars, and more cars means more Ozone with its detrimental effects on children, elderly folks, and anyone with asthma.

Documentation:

https://www.davisvanguard.org/2021/07/guest-commentary-the-many-downsides-of-ending-single-family-zoning-a-progressives-view/?fbclid=IwAR2FMHVd8aWdHBCB60yePPIPVUR0Ibici0R-3xIT_nbWArYQv6G7NdzBR4

This article describes a few of the unintended environmental consequences of corporations buying up houses across the country, turning “neighborhoods from green to gray.”

“Corporations buying up houses across the country…

eliminate yards, turning neighborhoods from green to grey. Vegetation helps reduce air pollution and heat as well as providing habitat for birds, insects and animals.

Aging sewer system…

Over the objection of many neighbors and neighborhoods, the city of Minneapolis upzoned all of its single family neighborhoods. Neighbors who sued because the city’s Environmental Impact Report did not adequately address the impacts of upzoning recently won a court battle.

Unintended consequences…smaller crappier houses for no less money…absentee investors

Eliminating single family zoning is an experiment lacking justification and evidence. It is also has the ability, like poorly done urban renewal of the past, to create damage that is hard to undo.”
WMCCA Testimony on Thrive

Testimony by Kenneth Bawer, West Montgomery Citizens Association

“Astonishingly, the County water supply is mentioned only once, on page 144 (aside from quoting from the Wedges and Corridors plan). Our drinking water sources need to be protected by new Drinking Water Special Protection Areas, downzoning, purchase of land outright or via eminent domain, enhanced tax credit for conservation easements…”

Please see Mr. Bawer’s Testimony, which provides a voluminous amount of material about Thrive’s silence on numerous environmental issues, including, but not limited to: public water quality, well water quality, tree conservation, native habitats, loss of species, stream health, light pollution, and many more.

Mr. Bawer provides a detailed response to the wording in the Thrive document. This is extremely helpful in highlighting some of the deficiencies of Thrive.

It is shocking that a planning document does not address environmental issues. Montgomery County takes pride in its environmental policies; how can a document like this pass muster? It is up to the County Council to require a re-write from Planning so that all of the environmental issues are addressed.

I support Mr. Bawer’s comments:https://www.npr.org/local/305/2021/12/03/1061192043/severe-understaffing-could-make-maryland-drinking-water-unsafe-says-a-g

“Our vision for 2050 is a County which is not developer-centric but rather is resident-centric and environment-centric, where the focus is on sustainable growth, not simply population, business, and job growth. The current draft Plan treats population growth as an expectation, rather than either a desired goal or a potential problem.”

https://www.npr.org/local/305/2021/12/03/1061192043/severe-understaffing-could-make-maryland-drinking-water-unsafe-says-a-g

Attorney General Brian Frosh has recently raised concerns about Maryland’s drinking water. Will Montgomery County become another Flint? Infill development without addressing drinking water systems would seem to raise a red flag. Aging pipes pose the threat of leaching lead, and adding capacity to these pipes will strain the system. Why has the Planning Department not addressed this?

“Maryland’s drinking water remains at risk,’ wrote Frosh. ‘This threat to the public health should not continue one more day.’

The analysis, conducted by the consultant group Cadmus, under contract with the EPA, found a "severe gap" between the resources currently available to Maryland's water supply program, and the resources it needs to adequately ensure safe drinking water. The analysis found that the program's "ability to protect public health is compromised.”
Montgomery Countryside Alliance
Statement on Thrive’s Failure on Water

The Montgomery Countryside Alliance has also raised the alarm on Thrive’s lack of attention to water issues. As a resident of the Ag Reserve, I depend on having clean drinking water. Extensive unregulated development could foul the aquifers that provide our drinking water, and cause thousands of Ag Reserve residents to turn to the County for help. Why has the Planning Department not addressed this? Montgomery County must do better. We rely on the County Council to step in and demand that the Planning Department address how Thrive will protect drinking water - public and private.

Here is a segment of the Montgomery Countryside Alliance statement on Thrive and water:

“How Thrive Fails on Water:

In a plan meant to chart the future of our community- what you focus on is what you get more of - so where is the focus on the most essential resource we need? The plan points to a 2010 functional water resources plan for guidance - that plan is both dated and expires in 2030.

Thrive Omissions:

- The plan makes no mention of: "Chesapeake Bay", "Potomac River", or "Patuxent River" and passing mention of the sole source aquifer that supplies most of the Reserve. The plan seems willfully disinterested in where our water comes from or where it is ultimately going.
- Unlike the plans of surrounding jurisdictions, Thrive contains no watershed maps or stream quality maps and thus no discussion of their import.
- The plan makes no mention of projections from the Interstate Commission on the Potomac River Basin that by 2040 we will have severe droughts where demand will far exceed supply, even with the 4 proposed new reservoirs.

- The Thrive draft moving toward approval already has 60% fewer instances of the word "equity" than the draft created with public input. Water is an equity issue. The quality of the water that flows from the tap and through our streams matters to all neighborhoods. Like other green infrastructure like canopy cover, stream mapping would show that poorer neighborhoods have disproportionate water quality deficits with the associated public health issues.”

https://opus.lib.uts.edu.au/bitstream/10453/10709/1/2008000770OK.pdf

Although this scholarly article is from an Australian researcher, its viewpoint is instructive:
“This paper puts forward a principles-based approach to sustainable design in the development industry that incorporates the concepts of ecological limits, systems thinking and responsibility for impacts.” What are the ecological limits to the Thrive “plan”? And where does Thrive assume “responsibility for impacts”?


In this study, researchers found that infill development increased residents’ risks of breathing in toxic chemicals raising serious questions about environmental justice. Montgomery County is particularly prone to risk of air pollution given both our geography and our plethora of motor vehicles in the Greater Washington Area. While Thrive touts the idea that Metro ridership will increase with larger populations, Metro ridership has decreased significantly in recent years with little sign of a change in the opposite direction.


The Post documents the plummeting Metro ridership in this article. Even after many were inoculated, ridership remains a small fraction of what it was, and it is not clear that ridership will increase. With an ongoing pandemic, and vastly changing work arrangements, it is simply outdated for Thrive to rely on Metro ridership as a given. Where is the research on this? Again, the Planning Department undergirds its fantasy document with ideals not based on reality.


This article suggests that details matter in development proposals, and it is “deeply human to care about neighborhood character.” Where are the details in Thrive? The details are not there.

“In another article, Philadelphia Inquirer Architecture Critic Inga Saffron scrutinizes two controversial development proposals, producing this verdict: "one is going about creating density the right way, and the other is doing it all wrong." To frame the argument about the potential drawbacks of density, Saffron suggests that NIMBYs and YIMBYs are "mirror images, absolutists who see the world in stark black and white."

"It’s not unusual to hear YIMBYs declare that neighborhood character is irrelevant. They insist that any new apartment building is a blow for justice, no matter how grotesque its design. They seem incapable of understanding that it’s deeply human to care about what our surroundings look like. Context and details matter…”
The research shows that infill development significantly increases run-off thereby stressing systems already stressed. Montgomery County already does a poor job of dealing with existing run-off; creating “stream restorations” end up destroying mature trees and native habitats without permanently dealing with run-off. We end up with engineering drainage ditches that will eventually fail. Are “stream restorations” what Planning will rely on as run-off increases?

Although the study was about Denver, the conclusions seem applicable to Montgomery County:

“Infill development increases stormwater runoff by introducing more impervious surfaces, including roofs and driveways, which produce more runoff (additional stormwater).

Results predict that, on average, for each 1% increase in impervious area due to infill development, surface runoff volume will increase by 1.28% in the Berkeley neighborhood. Results demonstrate the limitations of the existing storm sewer network as pipes throughout the catchment reach capacity for events larger than the 2-yr storm for all three scenarios. Spatial maps of the catchment pinpoint subcatchments and sewer nodes of concern, namely surrounding a rapidly growing business corridor and the local Interstate. Overall, results indicate the infrastructure of the Berkeley neighborhood may be at risk, and that current stormwater capture policies may need to be revisited to accommodate both future infill development and climate change. This research provides a quantitative basis for implementing potential changes as well as examining the possibility of using the additional stormwater from redevelopment for beneficial use within Denver.”

Two scientists tout the health benefits of trees in a Washington Post Op Ed piece. They note that redlined neighborhoods contain less trees and green space. The emphasize, “We all have a right to benefit from trees, and numerous studies have demonstrated their value in addressing health disparities across the country.” They futher underscore the many health benefits provided by trees, and also warn about how gentrification can lead to a loss of trees: “Elected officials must address these concerns by implementing policies to prevent disruptive gentrification, while guiding tree-planting to communities with the highest need.”

“Trees are not nice-to-have amenities, reserved for people and communities that have benefited from long-standing public and private investment. And the $3 billion proposed for tree equity is not a frivolous investment. Rather, trees are a vital part of neighborhood infrastructure. The Build Back Better plan to fund tree planting is an important step that would undoubtedly make us all safer and healthier.”
Outright Chicanery:

And the outright chicanery. The Planning Department pushed Thrive 2050 through during a pandemic with no in-person meetings. The document at best is incomplete; at worse, it is a disaster. Yet some are impatient; pass the plan now they say. Why? What is the rush? Are developers anxious that they won't get their windfall? Significant numbers of residents don't know anything about Thrive. As a politically involved person, I have to admit I knew little until recently. But some neighbors are starting to learn about Thrive, and they are hopping mad. Will the Council rubber stamp the Planning Board's proposal without more outreach? Without in-person meetings? Without delving into the deficiencies that I and many others have pointed out?

In conclusion, the Planning Board engages in another example of chicanery: Thrive also pits those of us who live in the Ag Reserve against those who don’t. The Planning Department threatens us: support Thrive or we cannot assure the integrity of the Ag Reserve. This is manipulative and frankly, unacceptable.

I am hopeful, though, that in the end, the County Council will look closely at the Planning Department's document, fully explore its strengths, which are few, and its weaknesses, which are many. You have done so on other matters, I hope you will do so for Thrive 2050. To do no less will hurt us all.

Documentation:

https://shelterforce.org/2021/09/17/on-housing-democrats-sure-look-like-republicans/?fbclid=IwAR0voCAUM7OR5hWSFkwbwl8VwE3l3RsdJyQO1lnxrPXiCCB012-ML4mzSI

This article looks at the cozy relationship between real estate investors and the Democratic Party. I have wondered for some time about the less than savory results that can occur when the real estate complex has a hold on government.

Democrats look like Republicans on housing. Sept. 2021 - Dick Platkin - Shelterforce

“If you look closely, however, you can find evidence of the cozy relationship between real estate investors and the Democratic Party's housing policies as far back as the 1950s. Since then the Democrats have been the political party of choice for the urban growth machine, a complex set of mutually reinforcing real estate interests.
…unplanned upzoning programs, facilitated by local, state, and now federal programs to increase permitted densities, essentially providing financial gifts to property owners and real estate developers.

Regardless of the name, the goal is always the same: top-down intervention to increase property values and the profitability of real estate investments through privatization and deregulation. In this way Democrats at the municipal level, including LA’s recent mayors and city councilmembers, have become the midwives of the neo-liberal urban growth machine.

Transit ridership and the supply of low-priced housing continues to decline, while inequality and homelessness continue to grow.

This slide into trickle-down housing programs has percolated to the construction unions, environmental groups, churches, nonprofit housing organizations, some left-liberal political groups, and well-funded advocacy groups that make up the base of the local Democratic Party.”

*Thank you to Cary Lamari and Kenneth Bawer for providing some of the research referred to herein.