

## Thrive Montgomery 2050 Neighborhood Coalition: TM2050 Draft Process

March 18, 2020

Mr. Casey Anderson, Chair,  
and Members of the County Planning Board  
Montgomery County Planning Board  
2425 Reedie Drive, 14th Floor  
Wheaton, MD 20902

Dear Chair Anderson and Members of the Planning Board,

On behalf of the undersigned incorporated municipalities and community organizations, **representing more than 40,000 residents**, we are writing to express our serious concern with the process the Planning Board has followed for Thrive Montgomery 2050 since its October 1, 2020, meeting on the working draft. **We ask that the new draft be published in its entirety and a hearing on that draft be scheduled, to be followed as necessary by further work sessions, before transmission to the Council.** We appreciate that planning staff devoted considerable time and energy prior to the pandemic to outreach and research, and have continued to bring their expertise to bear. All of that will continue to be useful.

When the Board approved the working draft on October 1 and retained the November 19 date for the public hearing, the Chair recognized that the draft required extensive additional work. The County Executive on August 14, 2020, in required written comments, supported revision of the working draft as well, stating that the draft was confusing, unclear, did not set priorities, and failed to address significant issues around infrastructure and transportation. Stakeholders including residents and community organizations raised multiple issues through their own letters. The Planning Board Chair, the County Executive, and a large segment of residents and communities agreed: the draft as presented was not satisfactory. (The County Executive, as well as residents and community organizations, also requested that the public hearing be postponed to allow more time for consideration.)

The Board could have chosen to create a new working draft document with a later public hearing, but instead went ahead with the November 19 hearing based on the flawed document. Since the hearing, Planning staff have been writing a document so changed from the October working draft that it is a completely new draft plan that has been presented chapter by chapter at the Board's work sessions, with little or no opportunity for public comment.

The public comments from which staff and the Board are working are derived primarily from comments received prior to the record being closed on December 10, 2020. Lengthy as those comments may be, they do not reflect community reaction to what has been a major rewrite, with substantive changes in the content of the plan, not just reorganization of elements made available for comment earlier.

Another problem is that under the current process a complete copy of the rewritten plan will not be made available to the public for comment before it is delivered to the Council. The document put together at the end of the Planning Board rewrite process will be subject only to minimal, non-substantive changes. Meaningful comments are difficult, if not impossible, without the context of the full report.

On January 27, 2021, a second letter from the County Executive addressed the proposed new draft: “The separate chapters on the three overarching outcomes – Economic Health, Equity, and Environmental Resilience – have been removed, and the discussion of the three topics is now interspersed throughout the draft. There are six new themes in six new chapters; there are deleted recommendations, new recommendations, and new facts to support the recommendations.” The County Executive then asked, “How does the Planning Board expect the executive agencies to deal with this unusual situation? How will we be able to review and comment on a complete draft with its full recommendations?” If the agencies tasked with commenting on the draft are unable to do so under this process, it is infinitely more difficult for the public, generally lacking the level of expertise available in each agency.

With all the changes being proposed, this process has failed to address some important things, among them:

- The concepts of complete communities and missing middle housing have been adopted without including evidence (such as reference to case studies) that they will accomplish the articulated goals. Further, the concept of compatibility of missing middle housing with neighborhoods, mentioned repeatedly in the original working draft, and emphasized in the literature as an essential element of missing middle development, is not included in the rewrite.
- In contrast to the plan’s focus on housing, there is no real discussion of economic development. Housing needs and economic development are interrelated and inseparable: the December 2020 Staff Report on White Flint determined that unless there are jobs in an area, developers will not build housing there. This plan does not recognize that.
- Many of the proposed elements of the plan, such as a substantially improved transportation system and expanded parks, will require increased revenues, but the rewrite has even less in it about economics and funding than the initial draft.

The drive to finish the rewrite process so quickly has resulted in shortcomings in the analysis, research, proposed metrics to evaluate execution, and public explication necessary to ensure that Thrive Montgomery 2050 is based on careful consideration of facts, circumstances, and policy goals, all of which are necessary to garner community support and ultimately for Thrive to be successful.

It remains puzzling as to why there has been such haste on Thrive, when these basic requirements for a thirty-year plan have not been met. Legislative and campaign calendars may be driving the process but there is more than enough time before the deadline for this Council’s

consideration of land use issues – October 31, 2022 – is reached. Especially in light of a pandemic that has already created significant revenue deficits, the County should not proceed with a plan that is incomplete and not based on best practices. Artificial deadlines have distorted the process and undercut any effort to achieve workable consensus across the diverse populations that make up the County.

Thrive Montgomery presents an opportunity to bring our County together in support of a shared vision for the future. In its current form it does not do that. Delaying transmission to the Council offers an opportunity to improve a flawed product. You have effectively created a new draft, with significant changes from what the public commented on in November. The full rewrite should be published and a new hearing held to allow for full and transparent discussion.

Sincerely,

Nancy Abeles

Chair

Outside Impacts Committee

Bethesda Crest HOA

Adrian Addressi

Council Chair

Village of North Chevy Chase

David Barnes

President

Edgemoor Citizens Association

Joan Barron and Shelley Yeutter

Co-presidents

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Community Liaison

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Kira Lueders  
President  
Parkwood Residents Association

Cc: Gwen Wright, Planning Director

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Chair, Village Council  
Village of Chevy Chase Section 3  
Richard Mathias  
President  
Westbard Mews Condominium Association

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and the Town Council  
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President  
East Bethesda Citizens Association

Melanie Rose White  
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County Executive Marc Elrich  
Claire Iseli, Office of the County Executive  
Meredith Wellington, Office of the County Executive