



Darnestown Civic Association (DCA)
Written Feedback
Montgomery County Council's Virtual Community Listening Session on
Thrive Montgomery 2050 November 30, 2021

Early versions of Thrive Montgomery 2050 envisioned new ways of building community capability and making the planning process truly collaborative. We look forward to the day when our advanced county embraces an inclusive collaborative strategic planning process informed by a formal foresight function. We hope the Council can find a way to take the bold steps needed to reduce by a generation or two our wait until such a day arrives.

Our new comprehensive land use general plan needs to reinforce, rename, reaffirm, refine, and recommit to a **strong rural pattern**, containing nearly two-thirds of our land, thereby directing investment, development and growth into a tightly defined geographic area to achieve the population densities needed to create equitable outcomes, protect our ecosystem, and grow our economy.

It is time for another 1980 like line in the sand or the sprawl and corridor bloat will continue at the expense of the Corridor-Focused Growth area.

The residents of Darnestown and the Darnestown Civic Association have been actively engaged with Thrive for over two years. After writing you on 11/19/21, as included below on page 40, concerning one of the four straightforward non-disruptive Thrive adjustments we submitted as **Public Hearing testimony to the Montgomery County Council on July 8, 2021** we felt it would be useful for the Council to hear directly from our residents about the issue of being a named center of activity. In just three days over one in seven adults in our community decided to go on the record with you.

We continue to be certain our four straightforward non-disruptive adjustments are essential for our community and beneficial for the entire county. Since our July 8th testimony we have developed more layers of detail and rationale for our suggested adjustments. The clarity and cohesiveness of our adjustments grows

after each reiteration. We are ready to brief you and your staff at your request. We look forward to your consideration and support of our adjustments.

Thrive's Limited Growth area needs to be limited to avoid limited success. We have produced quite a bit of detail around how and why these adjustments need to be made and we are joined by other organizations in our call for these adjustments.

Thrive also risks limited success due to the failings it cites with its predecessors: tighter limits and plan adherence (see page 26) and the use of barriers, buffers and transition zones (see page 34). Thrive's large Limited Growth area and compact development everywhere in the name of complete communities create risk with their policy backed potential to induce sprawl.

Additionally, there are a multitude of minor language improvements, clarifications, and definitions needed in Thrive to ensure its guidance is not misconstrued or misused. There is no need for the plan to be weakened by a lack of final work effort around tightening the language.

A greater amount of consistency, coherence, and congruence better serves our county. The County Council should demand it. The Planning department is certainly capable of delivering it. Communities deserve it.

For now we continue to focus on the aspects that directly impact those we represent and communities like ours: places outside the Agricultural Reserve and outside the sewer envelope and more broadly all the areas outside what Thrive calls the "(established) development footprint".

A one page synopsis of issues with Thrive's Limited Growth area:

On a macro scale the Limited Growth area

- is a growth area with significant footprint
- consumes *Special Protections Areas*
- extends well outside *Priority Funding Areas*
- extends into *areas with no sewer service*
- extends into *sparsely populated areas*
- extends into areas with planned *rural patterns of transportation infrastructure*
- obfuscates the notion of an established development footprint
- is more than half composed of areas Planning designates as low "*level of activity heat*"
- Potomac areal is nearly half non-sewer service areas
- Patuxent areal west of MD-97 is nearly all non-sewer service areas
- consumes highly forested and stream intensive lands

and clearly appears to

- expand the established development footprint
- forgo a strong rural pattern
- detract from Corridor-Focused Growth

The Limited Growth area needs to be limited and the Rural Areas and Agricultural Reserve expanded to:

- create a resilient rural pattern
- protect the ecosystem
- align with other forward looking county policies
- support a variety of desirable county characteristics
- focus investment in the Corridor-Focused Growth area, Priority Funding Areas, and Equity Emphasis (Focus) Areas

Successfully managing a complex density gradient as illustrated within the Limited Growth area will be exceedingly difficult. Our wisdom and our experience say we will have very limited success for all the reasons pointed out in Thrive. In no case should the area be as large as proposed.

Supplemental Material to DCA July 8, 2021 Public Hearing Testimony

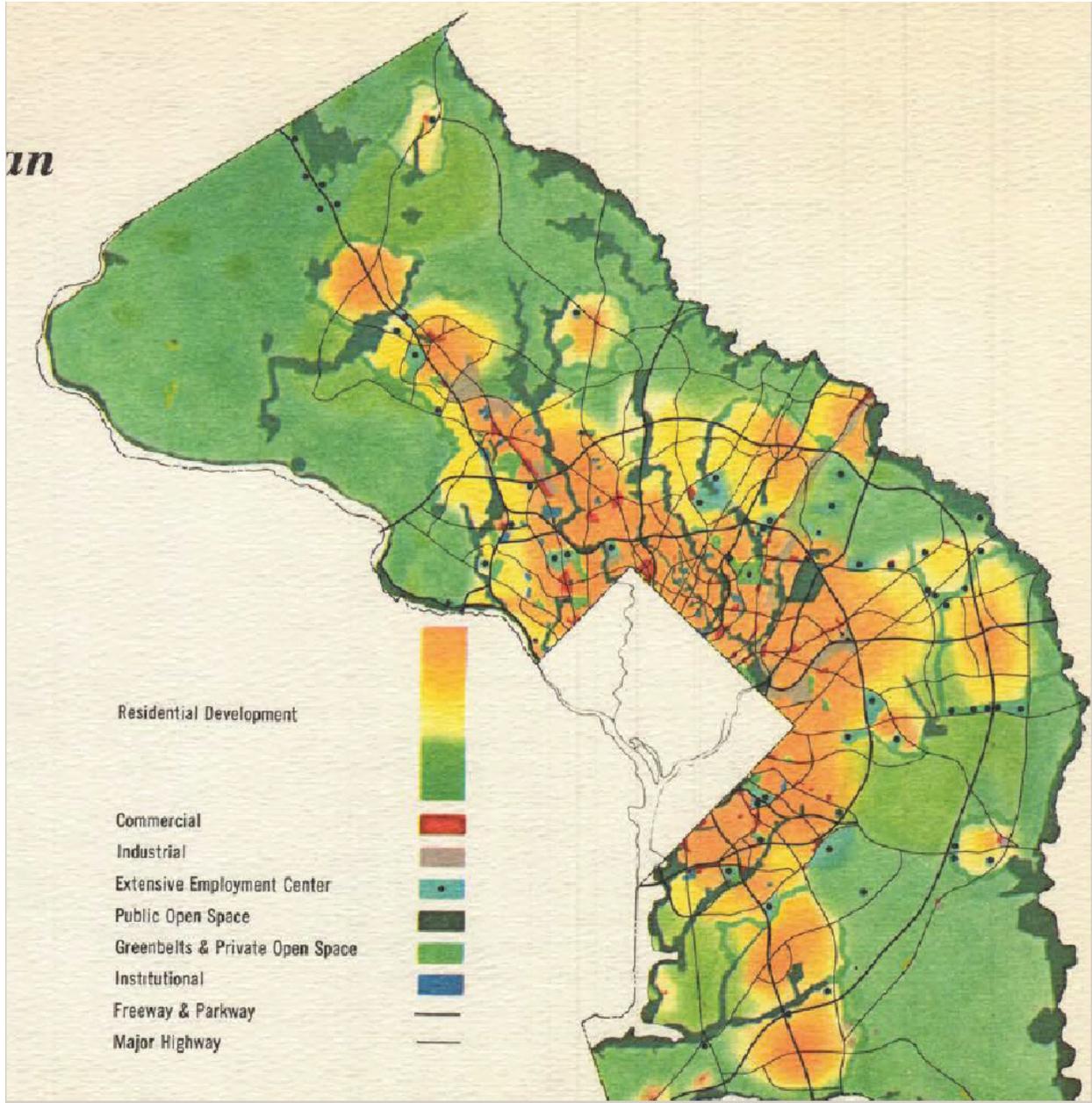
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[DCA Map Stack on the Rural Pattern and the Limited Growth Area](#)

What follows is something we call our map stack. It is a visual depiction of the Rural Pattern and shows Limited Growth area anomalies and its congruence and continuity issues with the natural, built, and planned environment.

1964 plan generalized land use map.
Large rural pattern constraining the urban core and corridors.
Olney and Damascus are outliers.



The 1993 plan, which is the current plan, defined the rural pattern and named it The Wedge consisting of two areas; an Agricultural Wedge and a Residential Wedge.

THE WEDGE

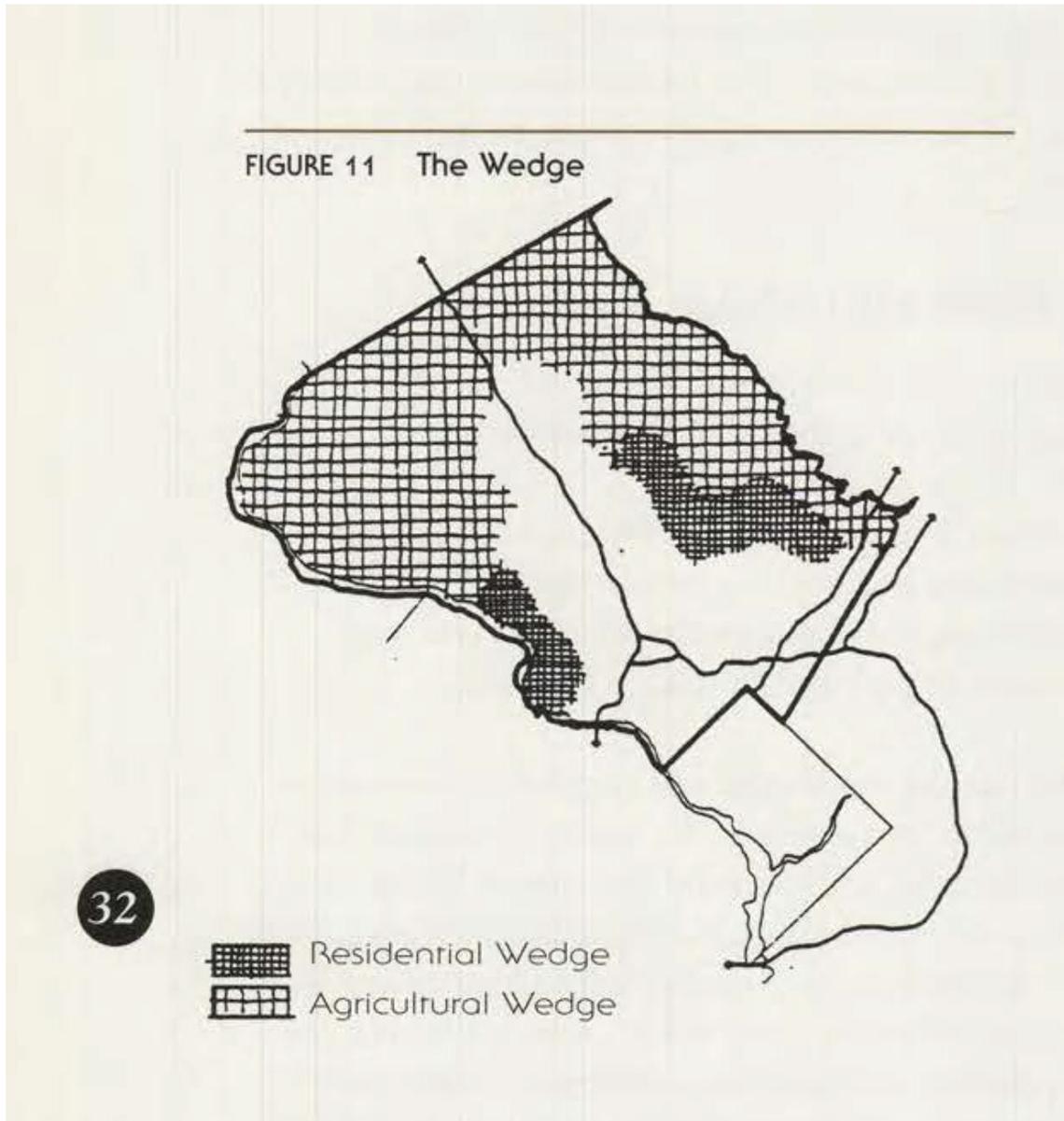
A vision for the Agricultural and Residential Wedge is generally characterized by ...

- agricultural use;
- low density residential development;
- large areas for open space;
- small rural centers; and
- targeted public and private investment.

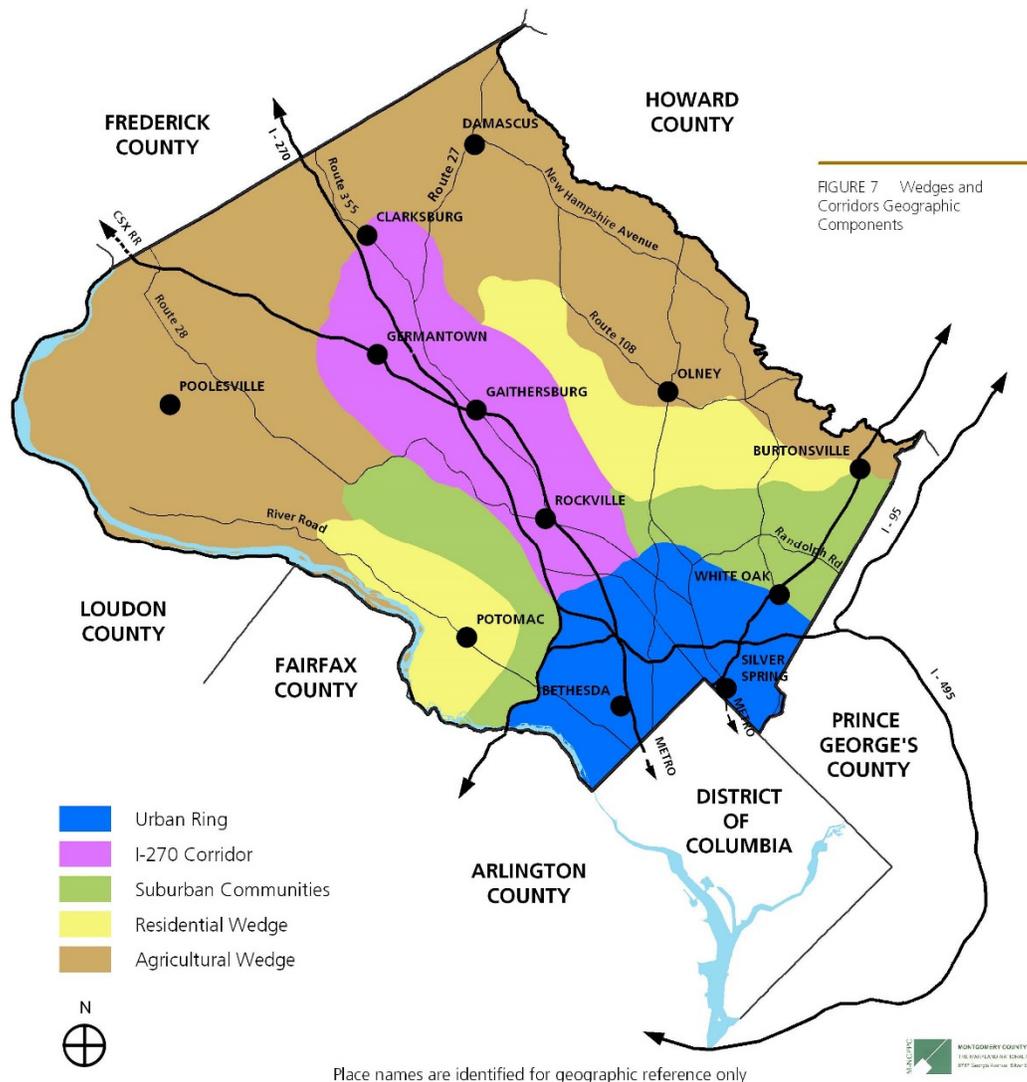
Location

The Wedge is divided into two distinct parts. The Agricultural Wedge consists of approximately 91,000 acres of land delineated as the Agricultural Reserve in the 1980 Functional Master Plan for the Preservation of Agriculture and Rural Open Space. **The Residential Wedge is defined as all Wedge areas outside the Agricultural Reserve. The Agricultural Wedge and the Residential Wedge together constitute approximately two-thirds of Montgomery County's entire land area. The Wedge areas are bounded by the County's two major water resources: to the west by the Potomac River and to the east by the Patuxent River.** Within the County, the Wedge areas are defined by the outer edges of the I-270 Corridor and by the Suburban Communities to the east and west of the Corridor.

The 1993 Wedge map representing the rural pattern.



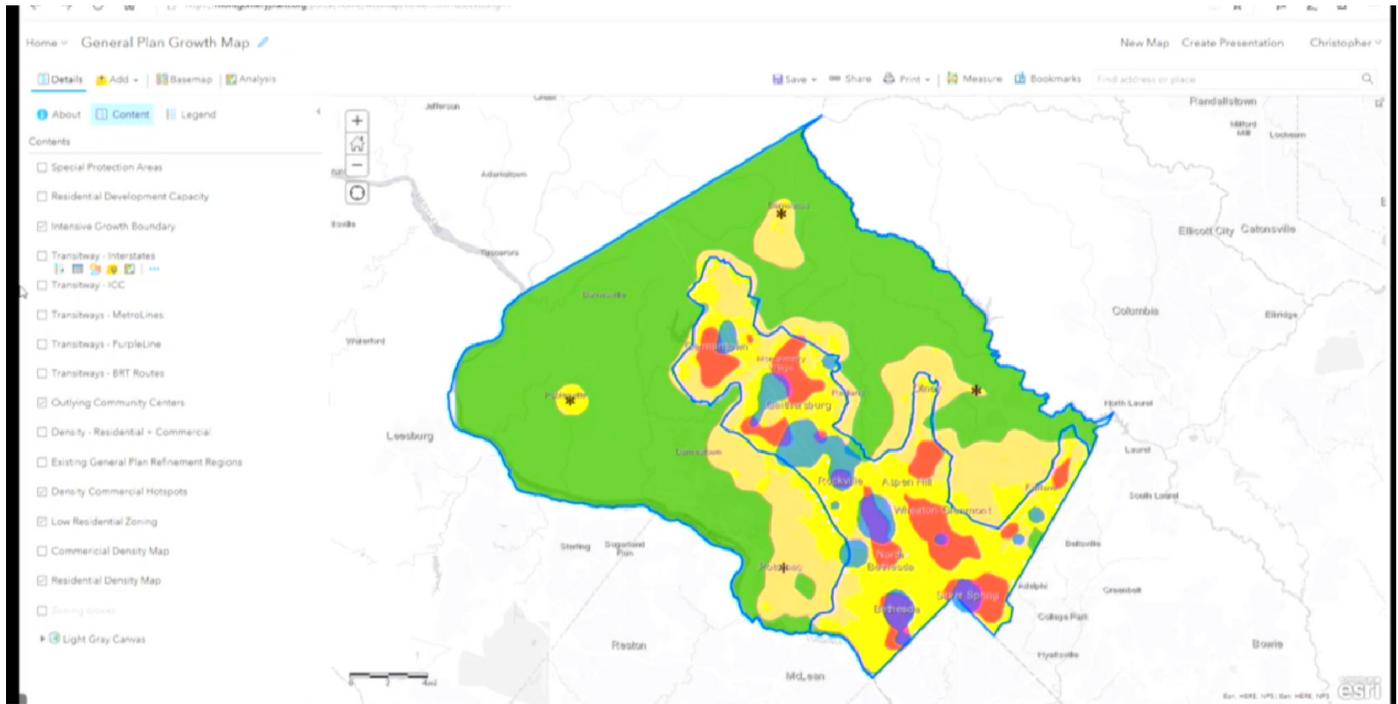
1993 plan generalized land use map.



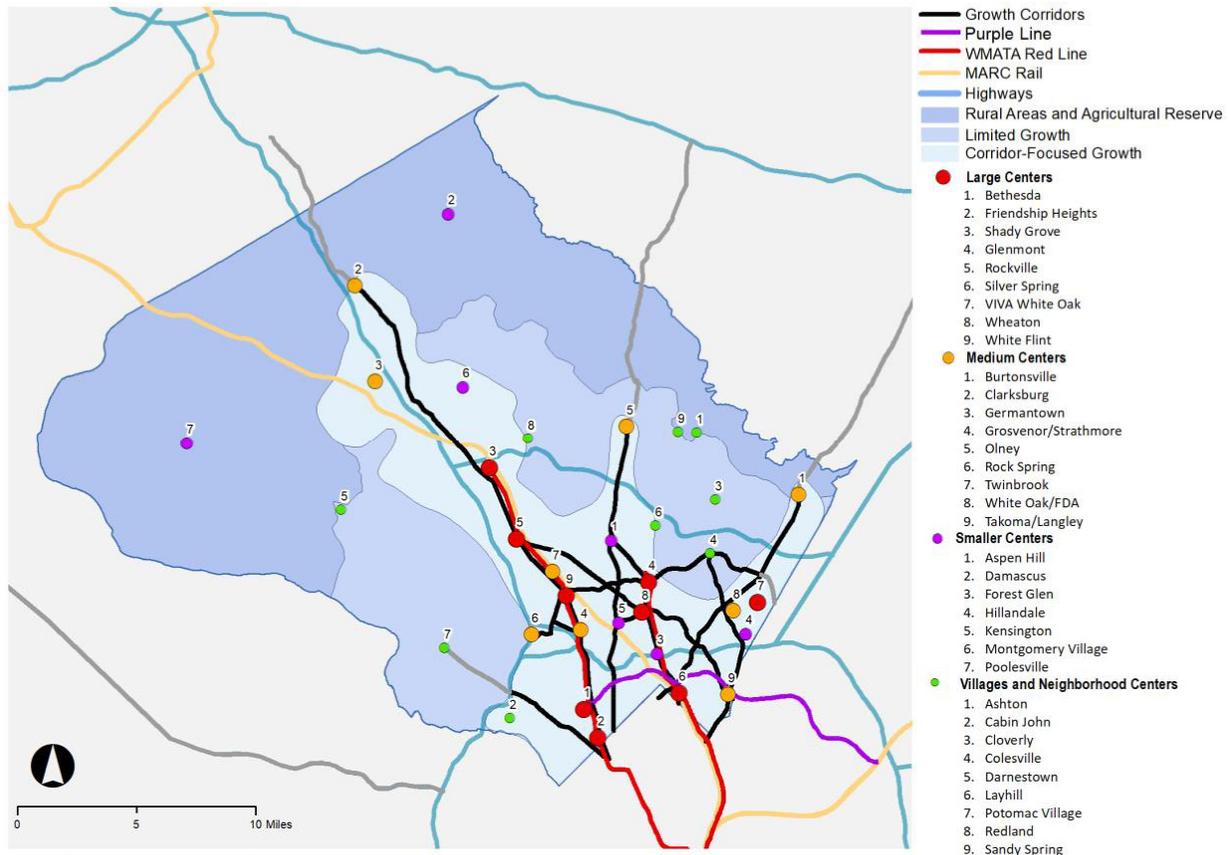
The Thrive Map from the Planning Board Public Hearing Draft. A web of centers and corridors focusing growth around transit stations and along the major corridors.



Thrive Growth Map from the Planning Board work session on January 28, 2021.



The currently proposed Thrive Montgomery 2050 Growth Map.



The Growth Map should be considered in the context of the Compact Growth and Complete Communities chapters. The centers of activity shown are not exhaustive of all existing or potential centers. Some of the centers listed on the growth map are not subject to Montgomery County zoning authority.

Thrive combines the yellow Residential Wedge and the green Suburban Communities of the 1993 plan together into a single area called the Limited Growth area. Not only does the Limited Growth area consume the entire Residential Wedge it includes land from the Agricultural Wedge.

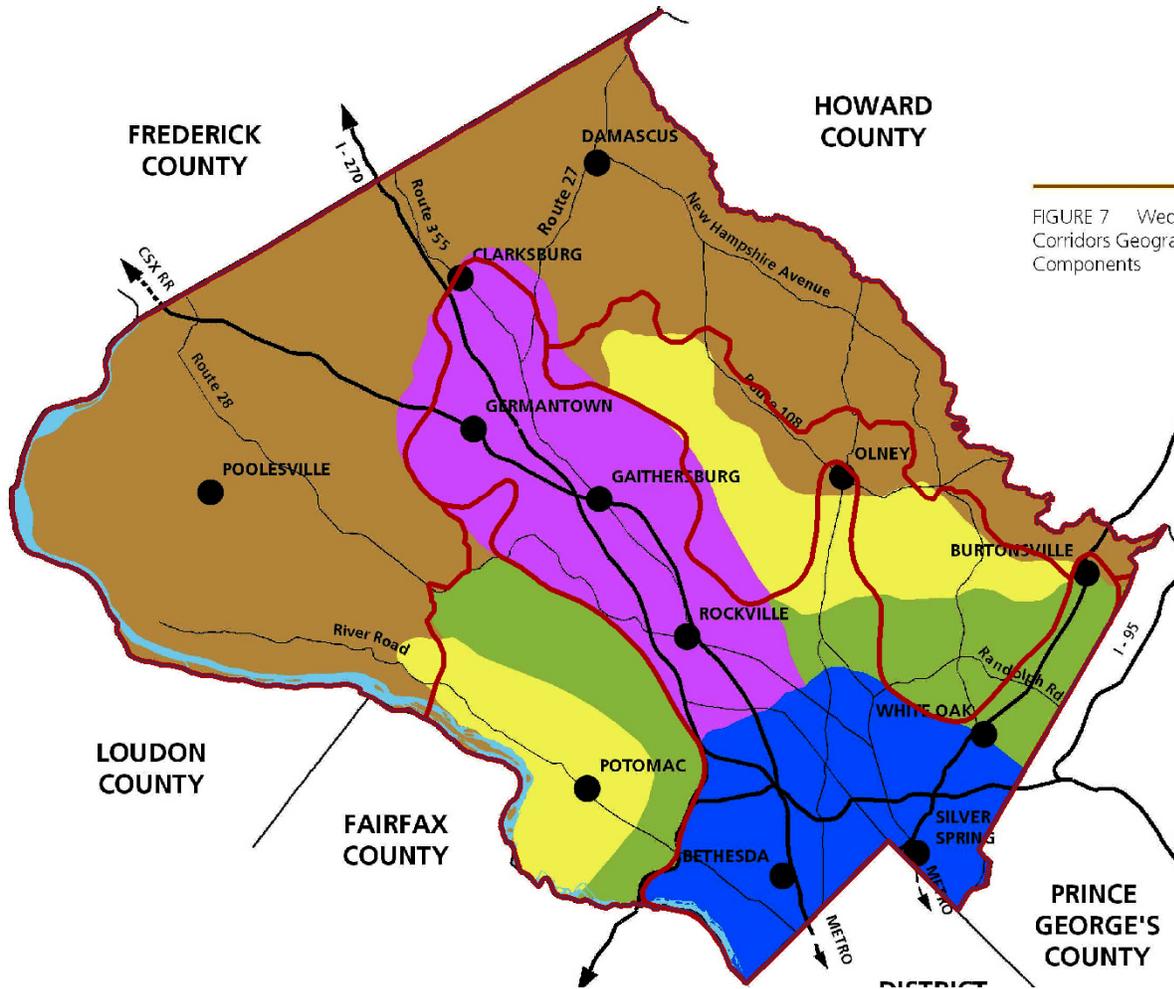
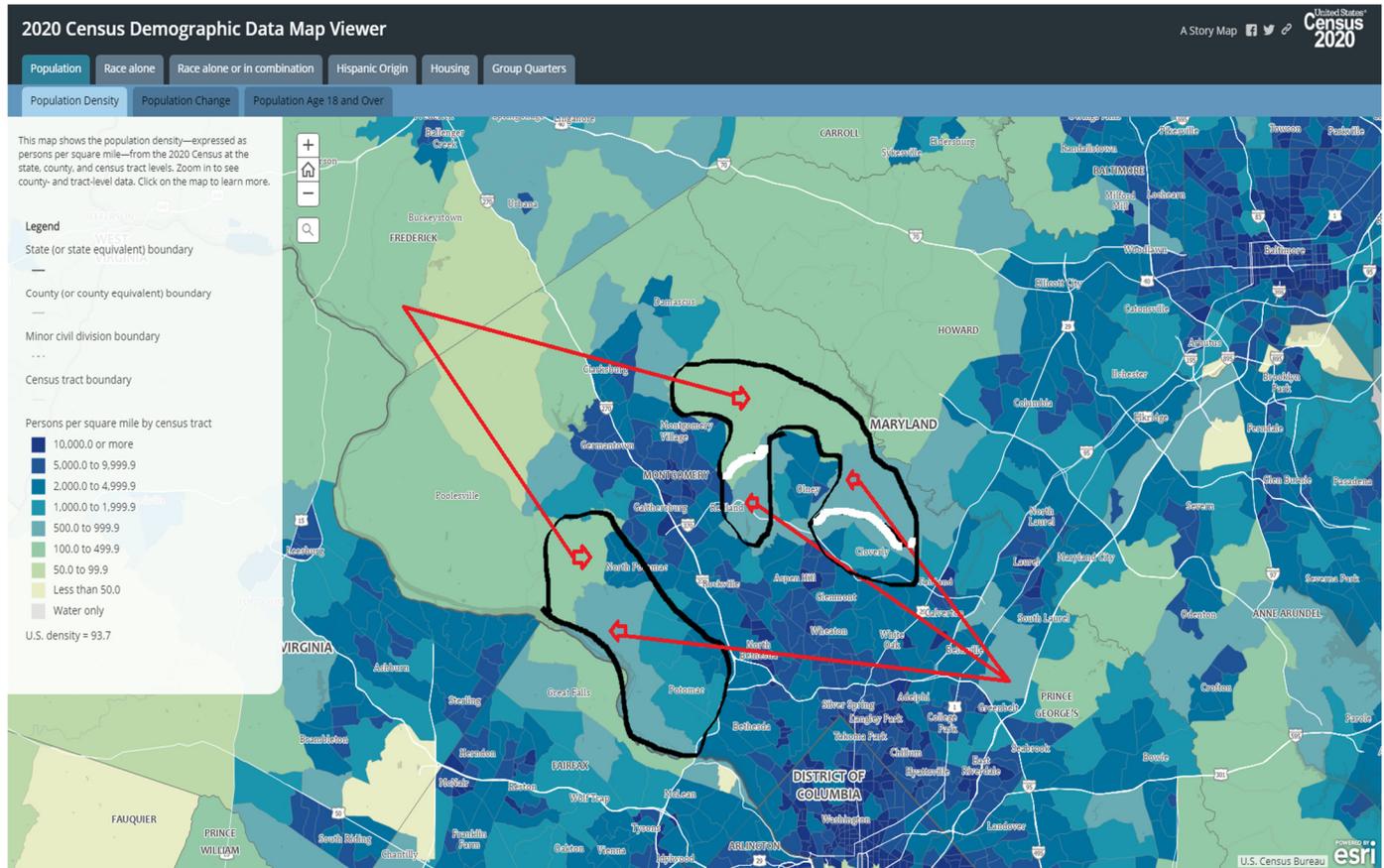


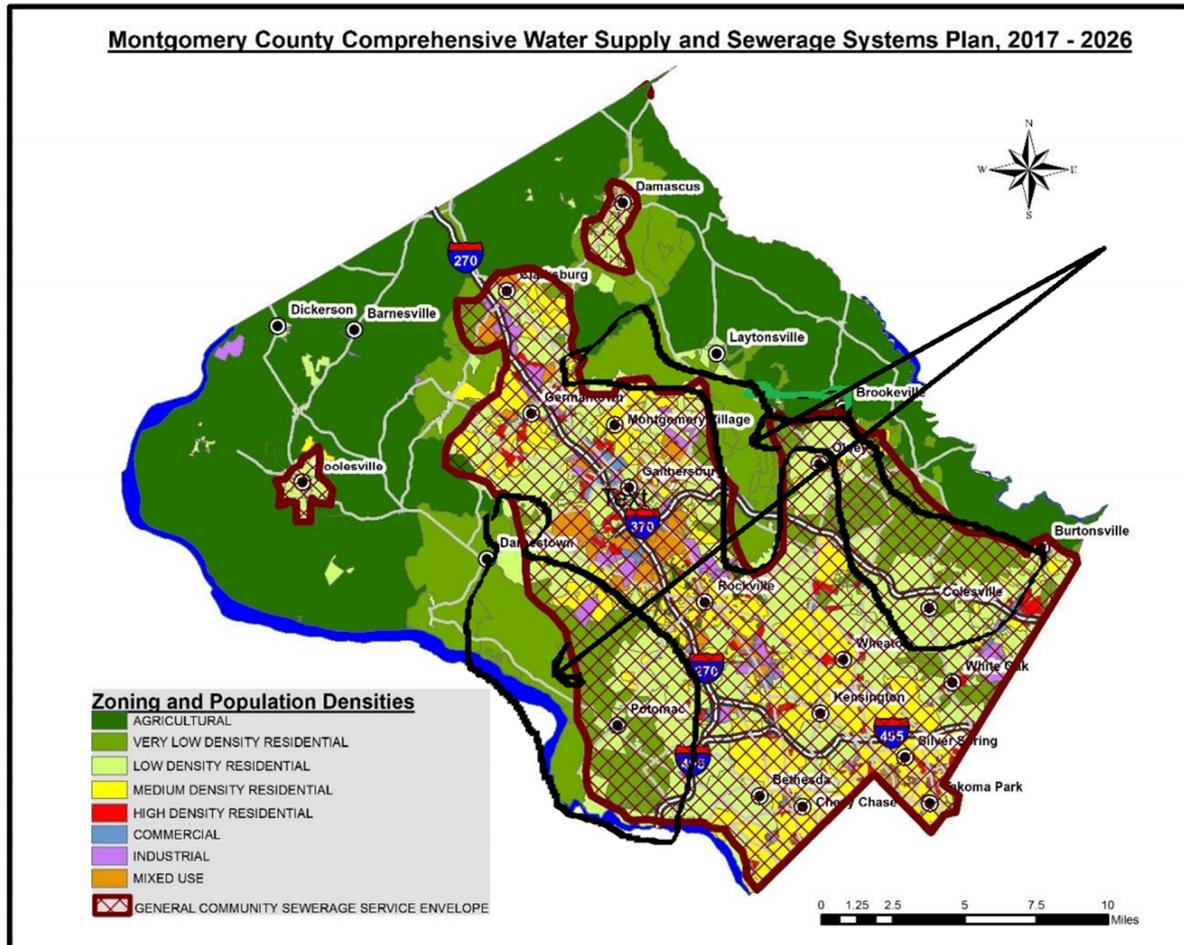
FIGURE 7 Wedge Corridors Geograj Components

The Limited Growth area extends well into Montgomery County’s least populated areas.

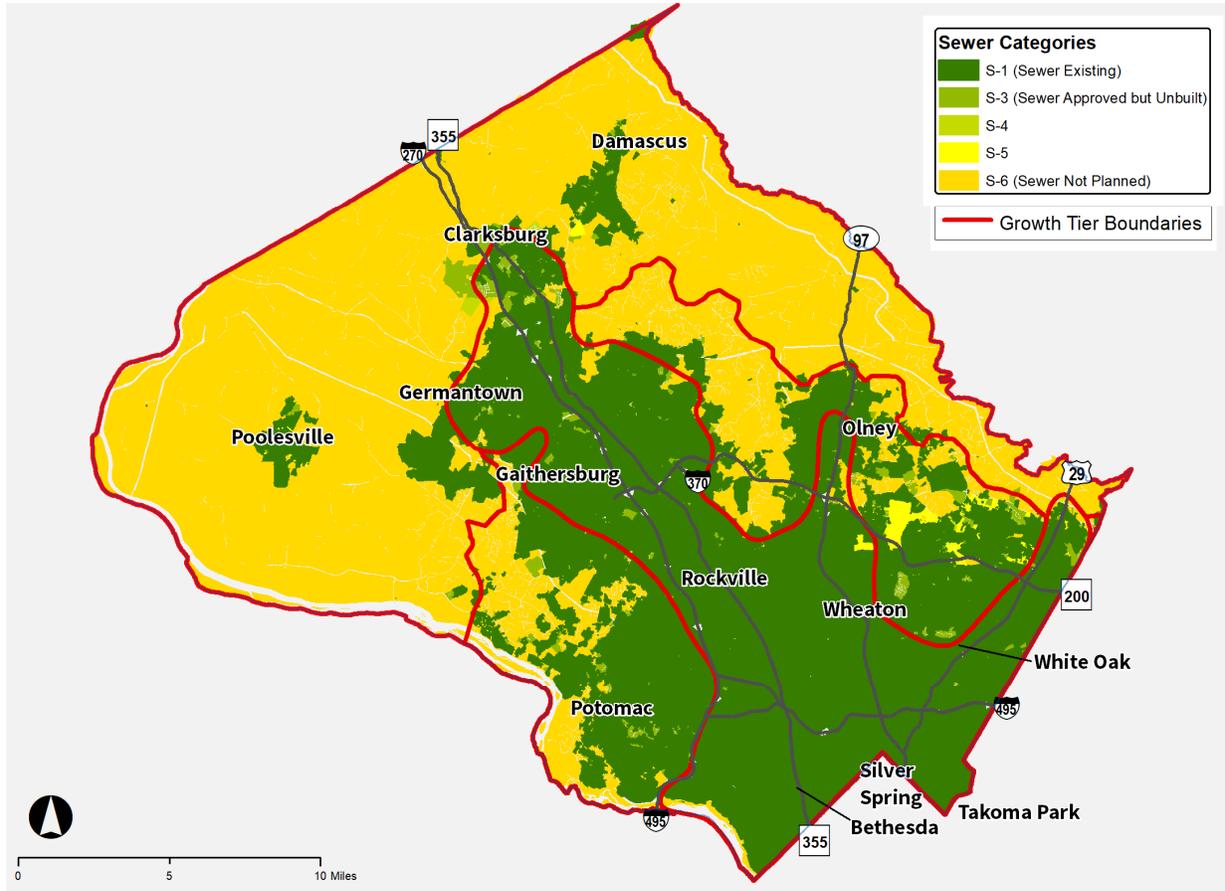


Thrive's Limited Growth Area includes two large areas outside the sewer service envelope.

and General Community Sewerage Service Envelope



The Limited Growth area promotes septic based development and / or an expansion of the sewer service area by its inclusion of “Sewer Not Planned” areas.



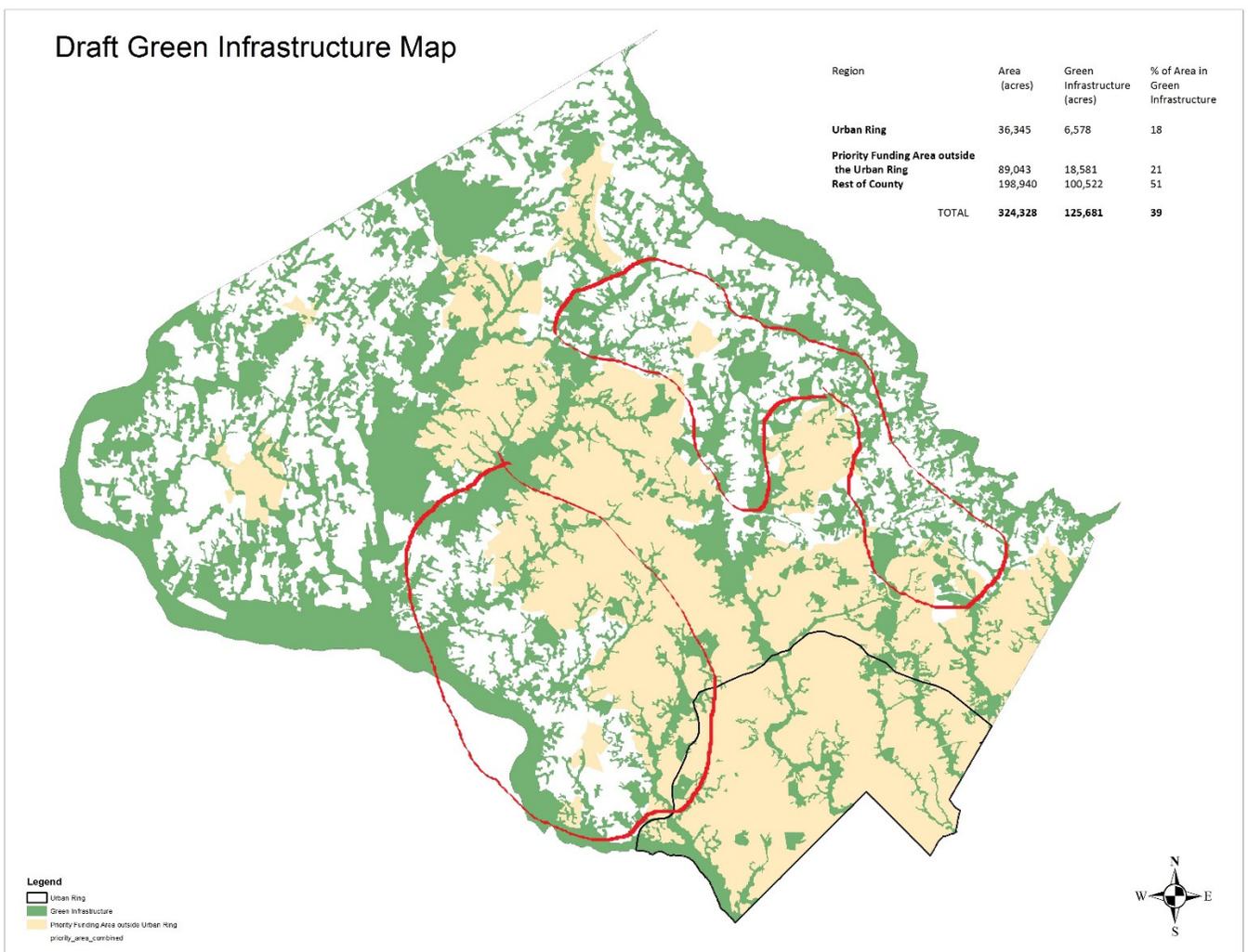
Document Path: O:\IT\I\Area 2\PopulationDensityMap\Khalid_lyr_Exports\Oct2021 thrive map with sewer envelope.mxd

The map used here is a generalized representation of ecosystem resources.

The northern Limited Growth area consumes high green density land.

The southern Limited Growth area covers the entire narrow green zone between the Potomac River and the Corridor-Focused Growth area.

The Limited Growth area contains a large amount of land outside of Priority Funding Areas and Rural Villages.

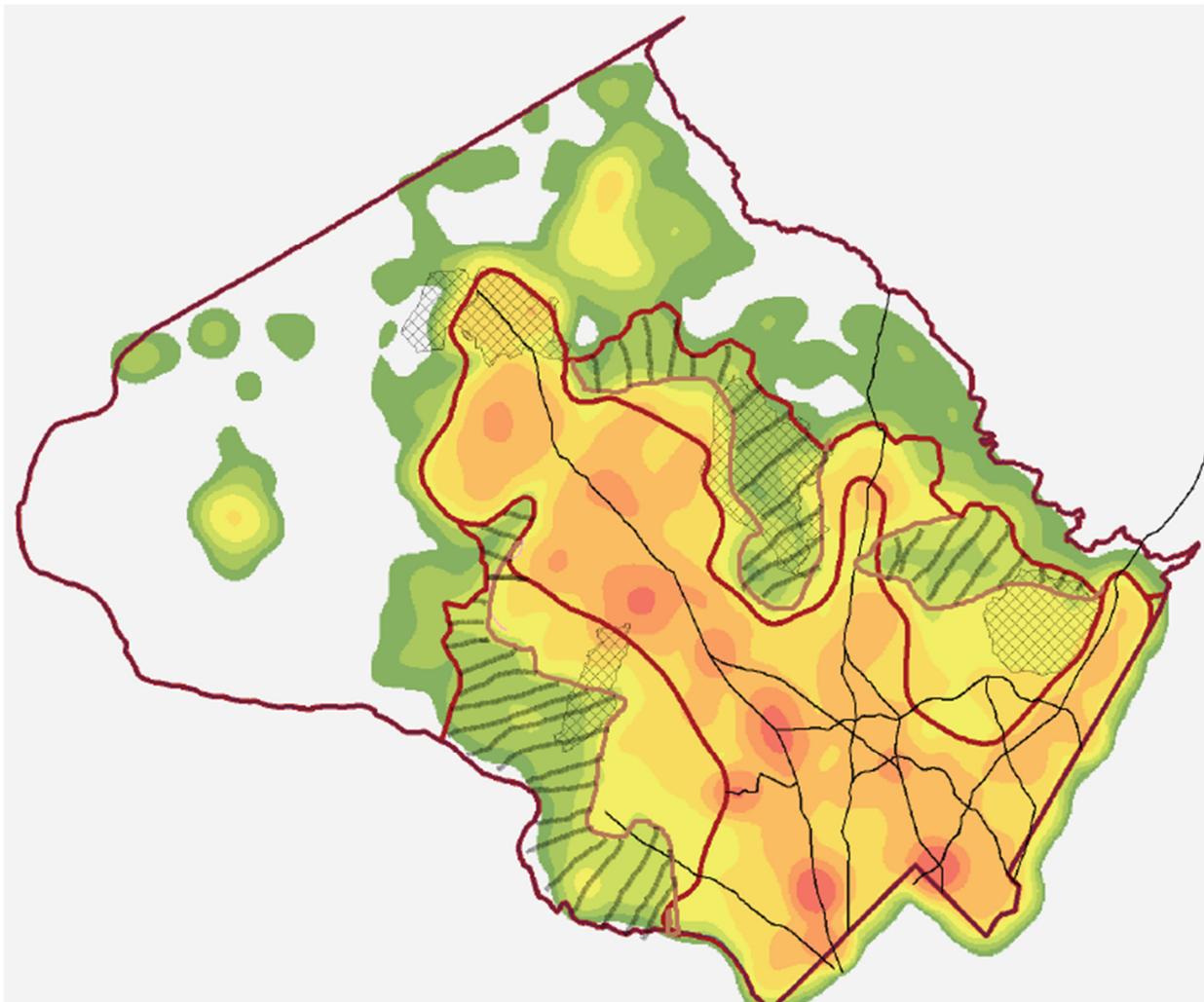


The colors represent “a level of activity heat map”.

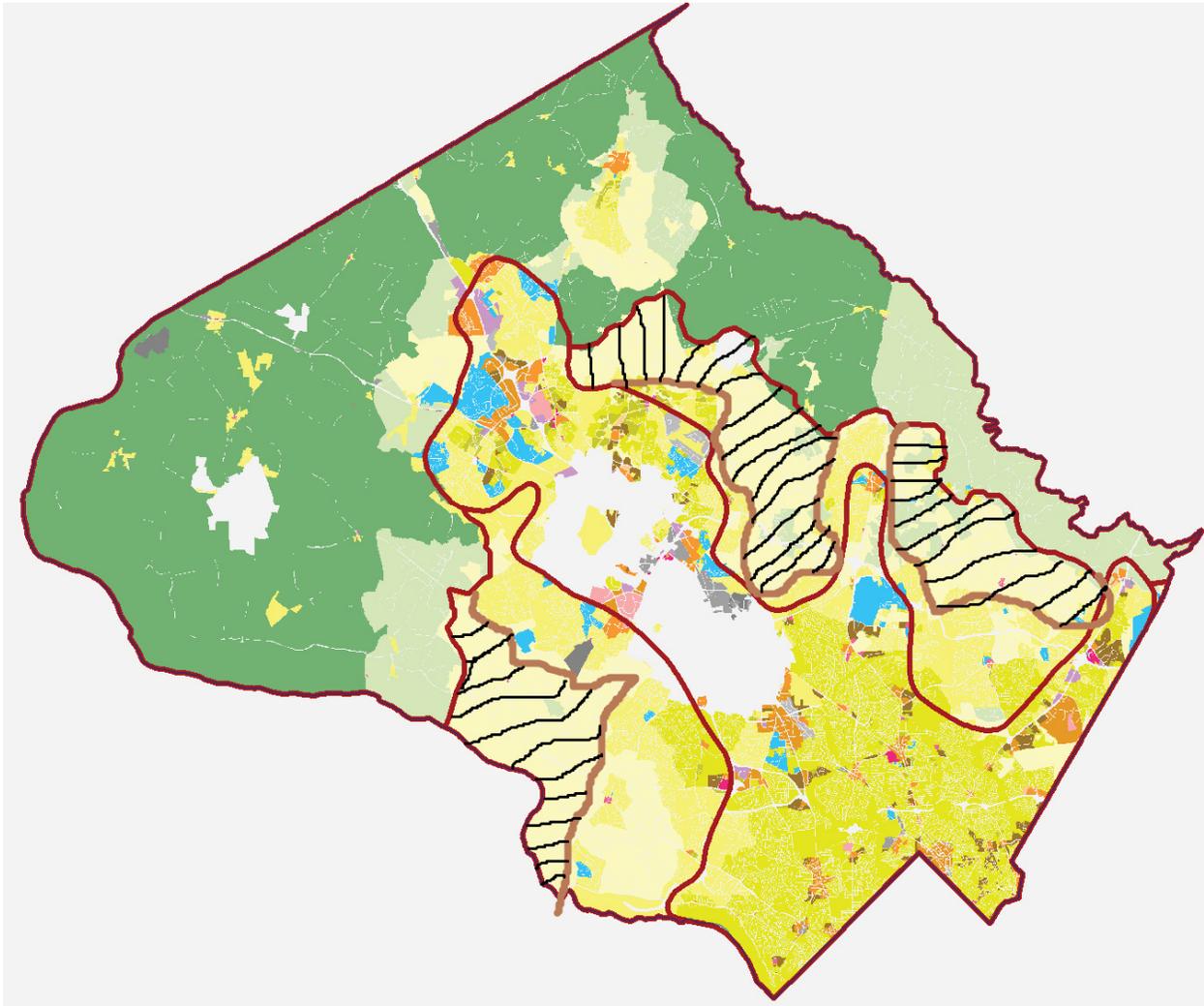
The tight cross-hatched areas are Special Protection Areas.

The wide striped areas on the map represent lower heat areas that should remain in the Rural Areas and Agricultural Reserve and not be included in the Limited Growth area.

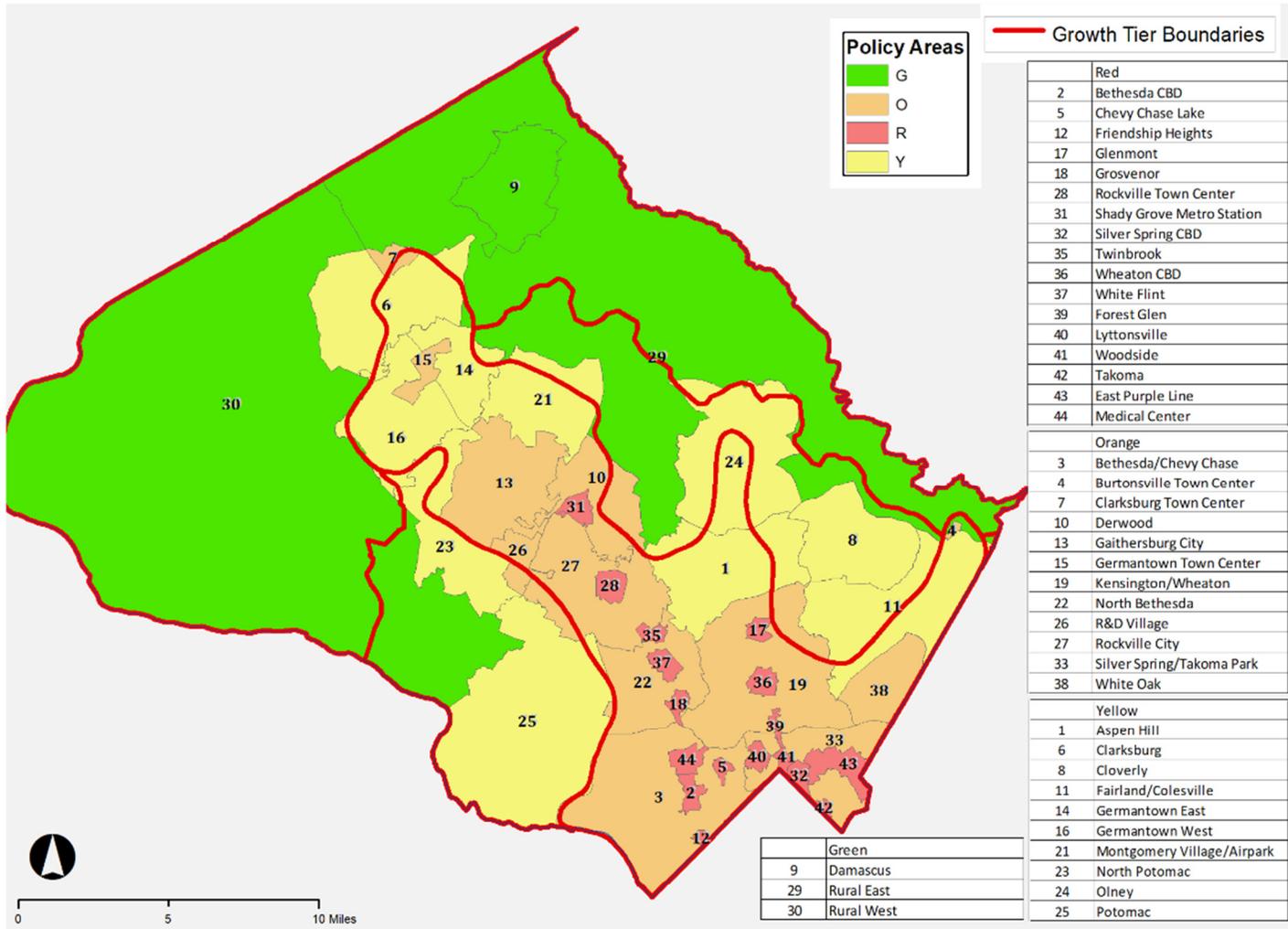
Three Special Protection Areas are consumed by the Limited Growth Area.



The wide striped areas on the map represent the RE1, RE-2, and R200 zones mostly outside the current sewer envelope that should be in the Rural Areas and Agricultural Reserve along with the RC (light green) zones.



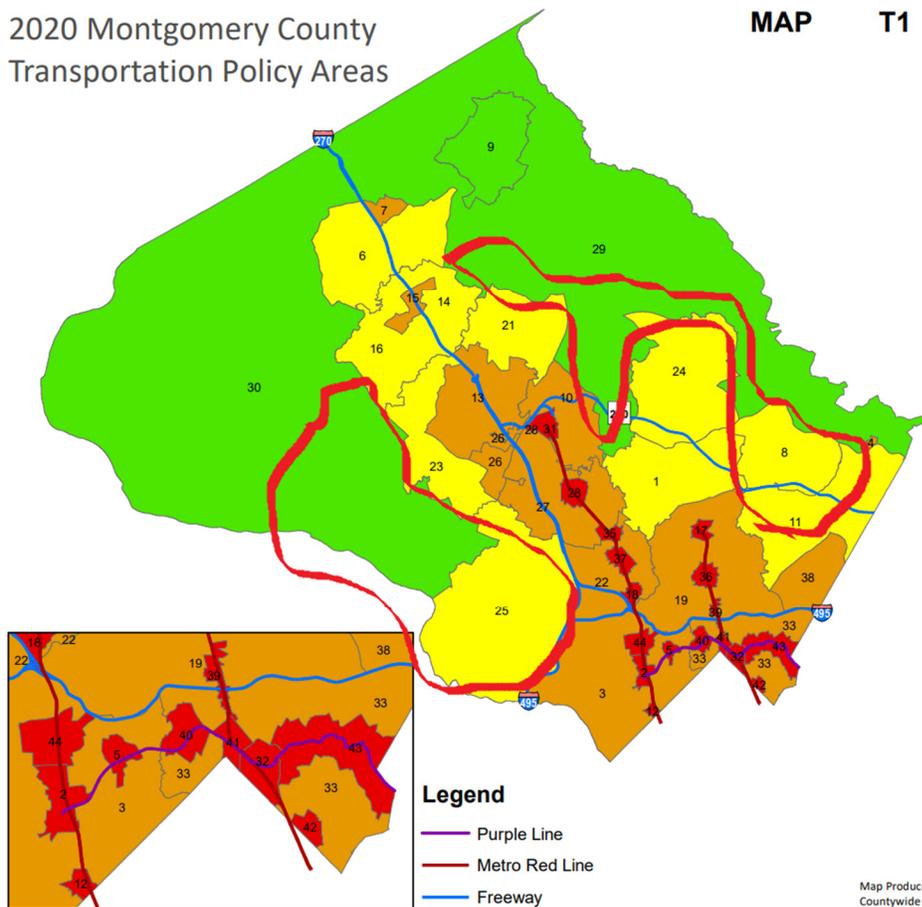
Thrive's Limited Growth area sprawls out into the Rural West and Rural East transportation policy areas of the adopted 2020 Growth and Infrastructure Plan.



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2020 Montgomery County Transportation Policy Areas

MAP T1



- Legend**
- Purple Line
 - Metro Red Line
 - Freeway

| Red | |
|--------|----------------------------|
| 2 | Bethesda CBD |
| 5 | Chevy Chase Lake |
| 12 | Friendship Heights |
| 17 | Glenmont |
| 18 | Grosvenor |
| 28 | Rockville Town Center |
| 31 | Shady Grove |
| 32 | Silver Spring CBD |
| 35 | Twinbrook |
| 36 | Wheaton CBD |
| 37 | White Flint |
| 39 | Forest Glen |
| 40 | Lyttonsville |
| 41 | Woodside |
| 42 | Takoma |
| 43 | Purple Line East |
| 44 | Medical Center |
| Orange | |
| 3 | Bethesda/Chevy Chase |
| 4 | Burtonsville Town Center |
| 7 | Clarksburg Town Center |
| 10 | Derwood |
| 13 | Gaithersburg City |
| 15 | Germantown Town Center |
| 19 | Kensington/Wheaton |
| 22 | North Bethesda |
| 26 | R&D Village |
| 27 | Rockville City |
| 33 | Silver Spring/Takoma Park |
| 38 | White Oak |
| Yellow | |
| 1 | Aspen Hill |
| 6 | Clarksburg |
| 8 | Cloverly |
| 11 | Fairland/Colesville |
| 14 | Germantown East |
| 16 | Germantown West |
| 21 | Montgomery Village/Airpark |
| 23 | North Potomac |
| 24 | Olney |
| 25 | Potomac |
| Green | |
| 9 | Damascus |
| 29 | Rural East |
| 30 | Rural West |

Map Produced by the Montgomery County Planning Department
Countywide Planning and Policy Division (CPP) November 11, 2020

An MPOHT base map with an (ESTABLISHED) DEVELOPMENT FOOTPRINT AND PROTECTED LANDS CONCEPT

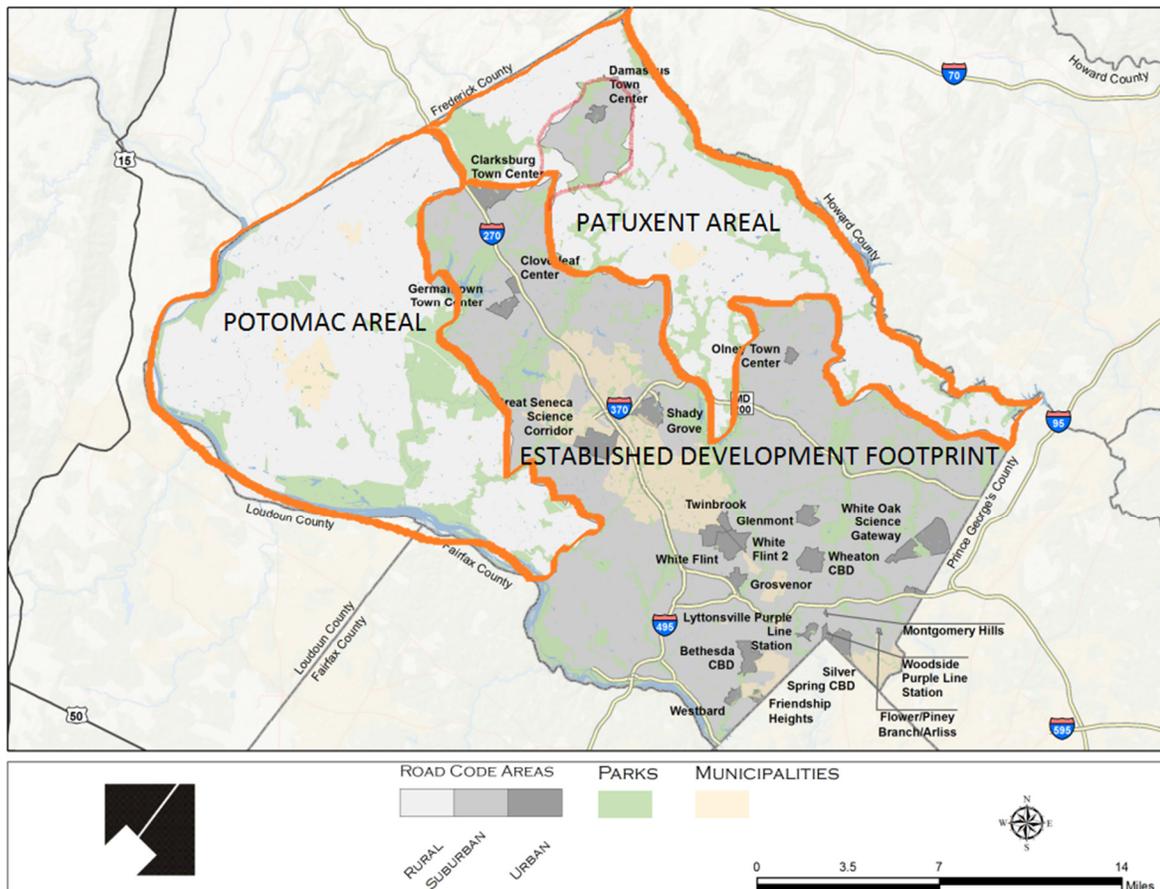


Figure 3: Road Code Areas

Limited Growth Area Definition

The Limited Growth Area between these two tiers contains the mainly suburban residential communities where limited, organic growth is recommended to meet localized needs for services and provide a diverse, and appropriate range of housing choices; increase racial and socioeconomic integration; and achieve more Complete Communities.

Our maps clearly show the Limited Growth Area is not mainly “suburban residential communities” in terms of land area. Large lot residential is not reasonably equated with suburban.

Verbal descriptors not reflected in the plan language accompanied by undefined controls over development in a wide swath of land containing hugely complex and varied density gradients, including greenfield areas near sensitive natural and heritage areas, leave the Limited Growth area vulnerable to the “political economy of sprawl”.

Thrive Growth Map – Two Corridor Oddities

1.

There are six light gray lines on the Growth Map:

- they are not identified in the legend
- one is in Virginia
- three extend past Medium Centers through the RA and AR into other counties
- one goes from the beltway to Potomac
- one goes through the Focused Growth Area into another county

The gray lines exist in all three Thrive areas. Perhaps these are the six corridors not identified as “priority corridors” in the metrics section of chapter 1.

2.

Colesville has three growth corridors and is in the Limited Growth area

The Rural (Sparsely Populated) Pattern: Land Area by Zone

An illustration of Strategic Land Use to Achieve Required Population Densities

Land Area by Zones and Strategic Population Density Plan

| | | % of | 317,000 | 2050 | 2050 |
|---------------------------|------|------------|---------|------------|-----------|
| <u>Rural</u> | Zone | total land | Acres | Population | pop./acre |
| | AR | 38% | | | |
| | R | 1% | | | |
| | RNC | 1% | | | |
| | RC | 9% | | | |
| Total | | 49% | | | |
| <u>Residential Estate</u> | | | | | |
| | RE1 | 4% | | | |
| | RE2 | 11% | | | |
| | RE2C | 2% | | | |
| Total | | 17% | | | |
| Sparsely Populated | | 66% | 209,220 | 75,000 | 2.79 |
| <u>Population Centers</u> | | | | | |
| | R200 | 12% | | | |
| | R90 | 6% | | | |
| | R60 | 6% | | | |
| | R40 | 6% | | | |
| Total | | 30% | 95,100 | 1,175,000 | 12.36 |
| Non-residential | | 4% | | | |

NOTES:

Population estimated using census tract GIS maps then applying expected growth rates.

Land area taken from old fact sheets produced during the 2014 zoning rewrite.

Zones are more varied and complex now, but the idea of a large sparsely populated area and a small densely populated area is well illustrated.

The Population Centers density is a very respectable 7,900 people per square mile.

Enough density to support frequent, pervasive, no cost to use transportation as a service.

Enough density to address our inequities, protect our ecosystem, and grow our economy.

Rural Pattern – Thrive is quite clear on the importance of the rural pattern. Previous plans have similarly given import to preventing growth in one area to focus it in another area. Thrive does not detail or emphasize its specific rural pattern and at times references the Agricultural Reserve as if it was the entire rural pattern. There is only a very narrow sliver of RC, R, and RNC land as the rural pattern outside the AR, as is now stated in the Growth Map “legend” on (29). Thrive makes no attempt to highlight its rural pattern design and describe the rationale for its size and shape, especially as contrasted with prior plans’ treatments, avoiding completely a discussion of how its rural pattern differs from the existing plan it intends to replace and the original plan, or how it will guide downstream plans in a new and better direction than the existing plan.

Our interpretation of the current 1993 plan rural pattern is shown in the map stacks we have shared. As stated in the plan documents, it is the Agricultural Wedge and the Residential Wedge. The Residential Wedge of the current 1993 plan includes by map reference some land in a residential zoning category, notably large lot residential like RE1 and RE2 on septic.

Current Zoning – The current rural pattern includes the Residential Wedge. The zoning categories in the Residential Wedge understandably can be zoning categories classified as residential. It is curious to claim low density residential is not part of the rural pattern because the zoning code category happens to be residential as might be expected in a Residential Wedge.

On the Zoning Map on (36) if you chose to change the lightest yellow (largest residential lots) to lightest green to portray them as the densest rural lots you more closely align with the current sewer and water, and transportation plans, and rural pattern. Aligned and in concert and congruent across all three main pillars of land use policy; environment, transportation, and water/sewer, and followed closely by power as a fourth pillar for advanced green communities. Our entire map stack is an effort to illustrate these alignments.

Where is Rural? - Zoning categories are not the only area designators of rural, urban, and suburban. Gun code, road codes, and a long list of other laws also define these area designators of rural, urban, and suburban.

Most county plans and policies designate Darnestown and areas like it as rural. No sewer, low road capacity, high densities of natural infrastructure (like streams and forests), green corridor proximity, and heritage resources. The Census Bureau designates as rural the three census block groups plus the handful of houses the DCA and the Potomac Subregion Master Plan call Darnestown.

In the end, the generally accepted definition of rural is a sparsely populated area.

Limited Growth area

Thrive's Growth Map areas use of the current Euclidean zoning as the foundation to define the new plan's strategic long-range growth footprint is curious. The same Euclidean zoning the new plan calls errant and intends to replace. The same zoning used as a tool to discriminate. The same zoning market forces and political forces were able to manipulate and overcome to bloat our corridors and drive sprawl as noted in Thrive:

" 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. On one hand, resistance to the kinds of dense infill and development in areas within the growth footprint identified by the 1964 plan left the urban form unrealized in many areas, with – for example – only a few Metrorail station areas developed with high density. On the other hand, the desire of property owners to maximize the value of their land in some cases led to more development in outlying areas than contemplated in 1964, with a proliferation of garden apartments and townhouses in places like Aspen Hill. The absence of tighter limits allowed development to disperse, consuming large amounts of land and increasing the cost of roads, water, sewer, and other public infrastructure by limiting economies of scale. This pattern of development also limited opportunities to offer cost-effective transit service."

The large Limited Growth area will continue to enable these dynamics.

We have proposed a straightforward, non-disruptive adjustment to the size of the Limited Growth area. Our adjustment aligns the Limited Growth area more closely with a myriad of foundational land use elements as well as being congruent and in concert with other current long-range plans, policies, and work products by extending and reinforcing their vision.

The Limited Growth area needs to be limited and the Rural Areas and Agricultural Reserve expanded to:

- create a resilient rural pattern
- align with other forward-looking county policies
- support a variety of desirable county characteristics
- focus investment in the Corridor-Focused Growth area, Priority Funding Areas, and Equity Focus Areas

DCA is joined by four other rural community associations;

- Montgomery Countryside Alliance
- West Montgomery County Citizens Association
- Sugarloaf Citizens Association
- Boyds Civic Association

and the Coalition for Smarter Growth in our call to adjust Thrive's Limited Growth area.

Maps and Discussion on (35) through (37)

Page (35) “The Growth Map is meant to guide the county’s future master plans, functional plans and other initiatives that will shape and directly impact all land use and development in the county.”

Thrive’s large Limited Growth area might very well guide master plans and functional plans to drive an expansion of transportation, and sewer and water infrastructure, and lead to greater negative environmental impacts as shown in the maps on (37) and in maps throughout our map stack.

Page (35) “The Transportation Policy Area Map, used in the Growth and Infrastructure Policy, and the Sewer Service Area Map, on the other hand, are regulatory tools periodically updated to implement the recommendations of the adopted master plans and functional plans as described below. “

The GIP and the Ten-Year Comprehensive Water Supply and Sewerage Systems Plan are part of the fabric woven by general, master, sector, minor master, and functional plans along with areas of code. These two plans are far more than “regulatory tools” and have foundations and roles in addition to their APFO component. The GIP and the Ten-Year Comprehensive Water Supply and Sewerage Systems Plan are two of our most forward looking detailed strategic land use planning and implementation programs.

MPOHT - an example of area designator origin and of another long-range program

The MPOHT is congruent with the GIP transportation component as one might expect. MPOHT derives its area designators of rural, urban, and suburban from a wholly difference place.

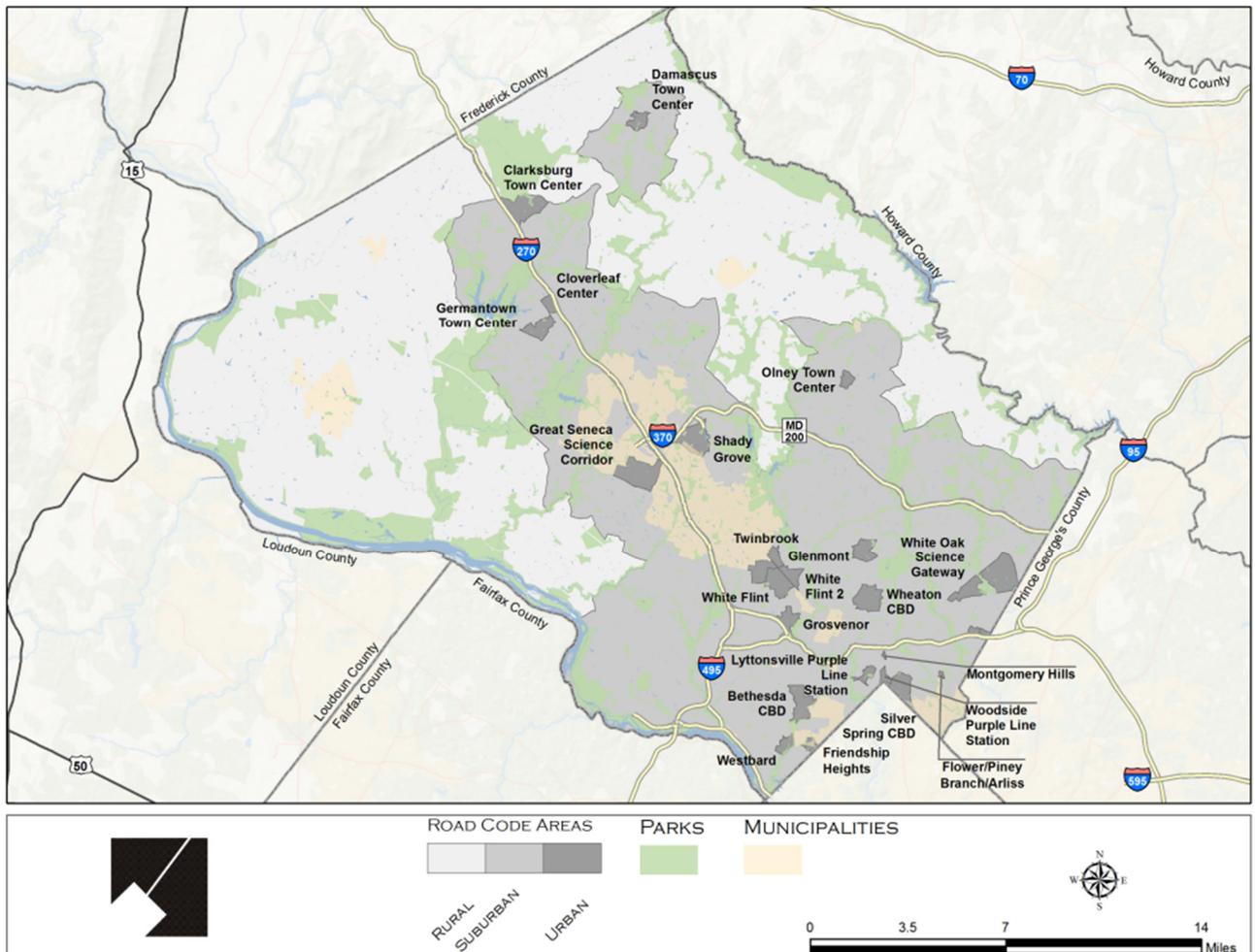


Figure 3: Road Code Areas

Excerpt from Technical Update to the Master Plan of Highways & Transitways | Approved and Adopted | December 2018 p4

This update to Montgomery County's Master Plan of Highways and Transitways provides a comprehensive summary of all significant existing and planned highway and transitway facilities within the county. The new master plan provides a "road map" for making transportation investments within the context of a long-range vision. It ensures the future network of transportation facilities will serve residents, businesses, visitors and people passing through the county. A new functional master plan for bicycles, completed in 2018, is independent from this document.

The example below shows explanatory text relating to how it all flows together, the kind of thing one would expect in a comprehensive strategic plan:

From p6

A functional master plan, following approval by the County Council and adoption by the Maryland-National Capital Park and Planning Commission, constitutes an amendment to the General Plan for Montgomery County. As such, it provides a set of comprehensive recommendations and guidelines for the use of publicly and privately-owned land within its planning area.

Countywide functional master plans are intended to provide a benchmark point of reference regarding public policy for a specific system. These plans cover such functions as overall circulation systems, parks and recreation facilities, environmental systems, agricultural preservation and public services, such as fire and police stations and libraries. A functional master plan reflects a vision of future development for these systems that is balanced with the principal development objectives of the entire county. A functional master plan amends the General Plan, but does not make land use or zoning recommendations.

Together with relevant master plans, a functional master plan should be referred to by public officials and private individuals when decisions are made that affect the facilities within the plan. It should be noted that functional master plan recommendations and guidelines are not intended to be specifically binding on subsequent actions, except in certain instances where documents such as the Zoning Ordinance or Subdivision Regulations require a specific condition to exist.

Functional master plans generally look ahead to a time horizon when the adopted area master plans will be fully developed. It is recognized that the original circumstances at the time of adoption of a functional master plan will change, and that the specifics of a plan may be viewed differently as time goes on.

Any sketches in an adopted functional master plan are for illustrative purposes only and intended to convey a general sense of desirable future character rather than any specific commitment to a detailed design.

Excerpted from the current code showing the area designator origin:

4.1 AREA TYPES

The context of a roadway begins with its nearby natural resources, terrain, and the manmade environment (development patterns, historic, cultural, and recreational assets). The environmental context can be a determinant of the desired type of roadway features to serve different users. This context often establishes the physical constraints of the roadway alignment and cross-section, and the influences the selection of target and design speed. This environmental context is generalized as area type as identified in Master Plans, the County Code, and field conditions. A description of the area types applicable to these standards follow.

URBAN

Urban areas are designated by the County Council. Urban areas typically include central business districts, town centers, or Metro Station Policy Areas (MSPA) with high density commercial and residential development. Open space is generally found in formal parks or urban preserves.

SUBURBAN

Suburban areas vary widely in character and are usually found surrounding the urban areas. Some components of suburban areas may appear rural in character, while others are densely populated and more closely resemble urban areas.

RURAL

Rural areas are generally undeveloped or sparsely settled with development at low densities along a small number of roadways or clustered in small villages. Rural areas are often distant from the metropolitan center. Large portions of the County's rural areas are in the agricultural reserve.

The Boundaries for Urban and Rural Areas have been established by the County Council and are shown in Appendix A. All other areas of the County are considered Suburban. The County Council may change these boundaries from time to time.

(bold emphasis is mine)

DCA Comments & Recommended Language Updates Following Final PHED Work Session

Clarifications

The language in this section / Appendix shall prevail and serves to resolve questions about intent and clarify cases where language is inconsistent, vague or in conflict with other language in the plan.

It is not the intent of the Limited Growth (LG) area to guide future sewer service area expansion or road improvements in the LG area, even if doing so would support complete communities. Expansion of the sewer service area takes away from focused growth and should be prohibited.

Extensions of sewer service into sparsely populated areas (under 2000 people per square mile, approximately equal to three people per acre) should be prohibited, even if doing so would support complete communities.

The Montgomery County Comprehensive Water Supply and Sewerage Systems Plan should not allow extensions outside the sewer service area for spot developments of any size.

Centers of activity should not be in areas without sewer service. Sewer service should not be extended to support a center of activity.

Centers of activity should not be in areas with rural transportation patterns. Transportation infrastructure should not be extended to support a center of activity.

Transportation plans should mitigate current and prevent future corridor level (highway and arterial) non-transit traffic in sparsely populated areas.

Sparsely populated areas are to be excluded from density initiatives, including compact growth and complete communities.

Sparsely populated areas need a fundamentally different form-based code and pattern book. Sparsely populated areas should remain sparsely populated.

New centers of activity and new complete communities should not be developed

- in the Limited Growth (LG) area
- in the Rural Areas and Agricultural Reserve (RA and AR)
- outside of Priority Funding Areas and Rural Villages
- near Special Protection Areas

It is imperative to focus growth into a narrow footprint in and around Equity Focus Areas.

Future policies, zoning law, general, master, sector, minor master, and functional plans should not expand the existing development footprint or the requisite infrastructure.

Limited Growth (LG) area

There is no language in Thrive around the Limited Growth area other than its introduction on the Growth Map. It was a very late addition. It did not exist in January 2021. The Growth Footprint map itself dates back only to after the PB Public Hearing in November 2020.

On a macro scale the Limited Growth area

- is a growth area with significant footprint
- consumes *Special Protections Areas*
- extends well outside *Priority Funding Areas*
- extends into *areas with no sewer service*
- extends into *sparsely populated areas*
- extends into areas with planned *rural patterns of transportation infrastructure*
- is more than half composed of areas Planning designates as low “*level of activity heat*”
- Potomac areal is nearly half non-sewer service areas
- Patuxent areal west of MD-97 is nearly all non-sewer service areas
- consumes highly *forested and stream intensive lands*

and clearly appears to

- expand the established development footprint
- forgo a strong rural pattern
- detract from Corridor-Focused Growth

The Limited Growth area needs to be limited and the Rural Areas and Agricultural Reserve expanded to:

- create a resilient rural pattern
- protect the ecosystem
- align with other forward looking county policies
- support a variety of desirable county characteristics
- focus investment in the Corridor-Focused Growth area, Priority Funding Areas, and Equity Focus Areas

Successfully managing a complex density gradient as illustrated within the LG area will be exceedingly difficult. Our wisdom and our experience say we will have very limited success for all the reasons pointed out in Thrive. In no case should the area be as large as proposed in the PB Draft.

The easiest gradient delineation to use for management is the current sewer service area. We should follow both the county sewer categories and the state level sewer tiers.

Another delineation closely aligns with the GIP transportation component areas. Sandy Spring and Ashton appear to be exceptions based on their designation as a Rural Village and their sewer service. They create a pleasant sprawl with greatly increased population densities. It is reasonable to expect transportation improvements to handle the higher end state densities.

A third delineation is by current zoning. Split the LG between RE lots and the smaller lots.

Another method is to use census tracts or census block groups to manage differently in the sparsely populated areas. The language we used in the Clarification section above used “sparsely populated areas” as an identifier. The essence of rural is sparsely populated.

Any combination of the identifiers italicized at the beginning of this section could be used as a delineator and they mostly align with each other and the above suggestions. Most of these have been picked up in the Clarifications section.

We have previously mentioned Thrive’s reasoning for limited success with previous plans. One aspect we have not mentioned regards the use of barriers, buffers and transition zones as effective land use tools. The LG justification should not be based on its ability to barrier, buffer or transition. The “political economy of sprawl” and “loose limits” will overwhelm aspirational controls. Quoting from Thrive:

““The separate-and-buffer approach failed to anticipate – much less meet – the demand for housing in mixed-use centers of activity. For the most part, the corridor cities neither achieved the densities nor provided for the variety of uses, building types and services necessary to maximize their value in attracting residents and workers looking for more vibrant and appealing places to live and work.””

““The separation of uses and associated homogeneity in lot sizes, development standards and building forms, coupled with the commitment to barriers, buffers and transitions had the effect – whether intentional or not – of discouraging connections among people and places and sharpening racial, social and economic divisions between neighborhoods and parts of the county.””

As per our County Council testimony, sparsely populated (low density) areas, whether they are part of the RA and AR or part of the LG area, require a radically different forms-based code and pattern book. The 2020 Coalition Accord on Rural Communities begins to suss out the full creed for settlement in these areas.

One of the few places we differ from Planning is that we believe compact forms are not appropriate at the T1 and T2 transects. Miniature cities and suburbs dotting the rural pattern are untenable long-term solutions. We are fans of recursive patterns in design but at the T1 and T2 transect levels, nature should be the central element not people and their structures.

We have contributed ideas around context sensitivities and density gradients.

From our June 11, 2020 PB testimony:

““We are open minded but wary and doubt the recursive nature of compaction and believe at its core it belies the most desirable features of each form type. As stated earlier we prefer a broader solution set of design principles. We envision a dynamic and broad range of Complete Communities across a wide spectrum of densities each with their own interpretive application of design principles befitting their defining aspects.””

From our July 8, 2021 County Council testimony:

““The rural and agricultural Protected Lands should be excluded from density initiatives, including compact growth and complete communities. These Protected Lands need a fundamentally different set of human settlement precepts. Perhaps a good example is how our rustic roads are covered by a whole different code set than the rest of our roads. We are also, in the Coalition Accord for Rural Communities, calling for a rural living creed which suggests accountability measures for situations where people own and inhabit large plots of land.””

Rural Area and Agricultural Reserve (RA and AR)

Almost all the language around the RA and AR only refers to the AR when describing the rural pattern. Only until the recent PHED meetings were the Rural Areas even broken out and then only as a footnote on the Growth Map.

The stated importance of the rural pattern and the text treatment of the details do not match.

A strong rural pattern directs investment, development and growth in a tightly defined geographic area achieving the densities needed to address our inequities, protect our ecosystem, and grow our economy.

All the sentences referring to the benefits of the rural pattern, AR, and RA and AR should be adjusted to mention forming a strong urban pattern thereby focusing growth. For example:

Preservation of land for recreation, agriculture, and environmental Management, and to focus growth must be ensured for the benefit of the entire county.

Another example:

More specifically, the following policies and practices should be adopted in order to maximize the efficiency of land use and public investment and establish the building blocks for development of vibrant centers of activity while preserving land to focus growth, for recreation, resource conservation, and agriculture.

Issues with Language

The development footprint is referenced multiple times and unclear. It seems to be anywhere development occurs, which are myriad. The plan provides no controlling influence.

As an example of numerous language issues we look at two sentences in paragraph 11, chapter 1:

Outside of these corridors, limited, organic growth should be allowed to meet localized needs for services and provide a balanced, diverse, and appropriate range of housing choices; increase racial and socioeconomic integration; and achieve more Complete Communities in all parts of the county.

“These corridors” refers to “major transportation corridors” and they are defined as “either have robust transit service in place or planned or are located close to existing concentrations of jobs, services, and infrastructure in ways that lend themselves to supporting more intensive development to produce the kinds of Complete Communities described later in this plan.”

The sentence says “limited, organic growth” should be allowed everywhere. The effect is outside of “these corridors” limited organic growth should be allowed in all parts of the county. The sentence ends with “in all parts of the county”.

It is also close to the wording, the only wording in the entire document, around the LG area.

“The Limited Growth area (medium blue) contains the mainly suburban residential communities where limited, organic growth is envisioned to meet localized needs for services, provide a diverse range of housing choices, and increase racial and socioeconomic integration to achieve Complete Communities.”

This limited development must be managed in ways that help to form more Complete Communities without expanding established development footprints or encouraging significant intensification of land uses outside of Complete Communities.

“Must be managed” flies in the face of our previous experiences as laid out in Thrive.

Planning has indicated master plans drive the development footprint and change the MPOHT, GIP, and the Montgomery County Comprehensive Water Supply and Sewerage Systems Plan which will allow the development footprint to continue to grow counter to Thrive. If we intend to focus growth to “established development footprints” then these current long-range transportation, water, and sewer service infrastructure components of land use would be fundamental in defining the “established development footprints”, as we have argued.

Thrive does not mention future Policies, Plans and Code adhering to the footprint.

The sentence is at odds with the first sentence which points to complete communities in all parts of the county regardless of the yet to be defined “established development footprint” and clearly allows for intensification of land uses inside complete communities. There is no designation of the complete communities, so there is no notion of where intensification is not allowed or where complete communities are not allowed. Moreover, it will all be allowed everywhere as it is simply “not encouraged” rather than disallowed.

Sometimes “corridors” is used and sometimes “growth corridors” is used and there are “priority corridors”. If they are the same, they should be stated the same, if not, then define them. There are numerous instances of these kinds of issues with other terms and phrases.

Kinds of growth mentioned in Thrive:

- limited
- organic
- infill
- redevelopment

These growth methods are inconsistently referenced as to where they are to be used. They are not defined, compared, or contrasted. The inconsistencies alone make the distinctions muted and are perhaps intentional. A long list of questions arises out of unstated definitions, for example:

- If zoning changes are made, is that considered organic?
- Is allowing for multi-use organic?
- Are higher densities organic?
- If sewer service needs to be added to an area is that organic?
- If road improvements are to be added to an area is that organic?

Most people involved in the process know how Thrive was written and why the inconsistencies are there, and we should fix it.

Guides and blueprints are more effective and less prone to misinterpretation if they use consistent terminology.

A greater amount of consistency, coherence, and congruence better serves our county. The County Council should demand it. The Planning department is certainly capable of delivering it.

Place Making Legal Constructs and Process Primer for Residents

A plain language guide for people new to the subject on the interaction between ordinances, executive agencies, Planning, and the County Council in place making. There are numerous examples of current Planning brochures, presentation slides, web pages, and document sections (such as the MPOHT section we included in our previous communication) attempting to depict bits and pieces of the puzzle.

County Subdivision, Zoning and Roads code

Federal, state, and local environmental regulations

Development approval process

GIP

Ten-Year Comprehensive Water Supply and Sewerage Systems Plan

MPOHT

MCPS planning programs and cycles

General, master, sector, minor master, and functional plans

Relevant State Acts: "Tiers" Act, "Smart Growth" Act, etc.

State Land Use Code

Special status of Montgomery and Prince Georges counties

- Background on M-NCPPC
- Division II

DCA Memo to County Council re: Darnestown as a Named Center of Activity
(11/19/2021)



MEMORANDUM

November 19, 2021

TO: Gabe Albornoz, Montgomery County Councilmember
Evan Glass, Montgomery County Councilmember
Tom Hucker, Montgomery County Councilmember
Sidney Katz, Montgomery County Councilmember
Nancy Navarro, Montgomery County Councilmember

FROM: Scott Mostrom, President, Darnestown Civic Association


SUBJECT: Darnestown as a Named Center of Activity

The Darnestown Civic Association has been actively contributing to the Thrive Montgomery 2050 effort since October 2019. Our public hearing testimony to the County Council in July 2021, which is on record, included all our previous public testimony to the Planning Board.

Darnestown is a bit of an enigma to many. Our geographic position in the county has given rise to a unique and crucial perspective on land use policy.

Thrive's description of past plans makes clear the need to limit the Limited Growth area to avoid limited success. Our suggestions around the Limited Growth area are well researched and documented. We are happy to brief you and your staff with a nine-minute presentation.

In addition to our broad work on the plan, I am writing to you today to bring a very specific Darnestown concern to your attention: Darnestown's inclusion as a named "center of activity" in the Thrive Montgomery 2050 Growth Map.

Darnestown has a very low population density. Our three main Census Block Groups are unique in many aspects and rank among the lowest population densities in the county outside the Agricultural Reserve.

Darnestown's inclusion as a named center of activity in the current version of Thrive Montgomery 2050 does not support a continuation of our very low population density way of life.

We are working several avenues to convince councilmembers that Darnestown should not be a named center of activity "where existing and future compact growth should be concentrated".

Our latest attempt was our 10/14/21 memo, attached below, to four councilmembers laying out several points that Darnestown is unlike every other named center of activity in many respects. We have observed conversations about how we are like Potomac or Sandy Spring / Ashton and other dismissive views not founded on the facts about how different our community is.

The issue of being named a center of activity is an issue only of importance to the 1900 or so households in our community as no other community similar to Darnestown has been subjected to being named a center of activity in Thrive.

We ask you move to strike Darnestown as a named center of activity on the Thrive Montgomery 2050 Growth Map.

MEMORANDUM

October 14, 2021

TO: Hans Riemer, Montgomery County Councilmember
Will Jawando, Montgomery County Councilmember
Andrew Friedson, Montgomery County Councilmember

CC: Craig Rice, Montgomery County Councilmember

FROM: Scott Mostrom, President, Darnestown Civic Association

SUBJECT: Darnestown as a Named Center of Activity

The Darnestown Civic Association has completed our review of the County Council central staff 9/20/21 decision to not recommend removing Darnestown from the Thrive Growth Map and offer the following:

While we agree that Darnestown fits the description of a Village and Neighborhood Center, we question it is appropriate to include it as a center of activity for the following reasons:

- Darnestown is the only named center without sewer service.
- Darnestown has a population density 2 to 8 times less than any other named Village and Neighborhood Center.

- Darnestown is the only named center outside of Priority Funding Areas and Rural Villages.
- Darnestown has one of the highest densities of vital natural and heritage resources in the county. The DCA sketched these in our Council testimony (p. 6) and include below for your convenience.
 - The Agricultural Reserve and the Seneca Historic District (Maryland's largest) to our west
 - The Potomac River & the C&O National Historical Park to our south
 - Muddy Branch Stream Valley on the east
 - Seneca Creek State Park that wraps our north and west borders plus five M-NCPPC parks
- The growth and higher population densities called for in centers of activity are not appropriate for Darnestown.

We truly appreciate your continued efforts on Thrive and hope that the inclusion of Darnestown on the Thrive Growth Map will be reconsidered by both Planning Staff and the County Council in the coming months.