

February 16, 2022

Montgomery County Council
Stella Werner Council Office Building
100 Maryland Ave
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Silver Spring Downtown and Adjacent Communities Plan (Support)

Testimony for February 17, 2022

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Thank you, Council President Albornoz and Councilmembers. My name is Jane Lyons and I'm testifying on behalf of the Coalition for Smarter Growth, the leading organization advocating for walkable, inclusive, transit-oriented communities as the most sustainable and equitable way for the DC region to grow and provide opportunities for all.

We support the draft of the Silver Spring Downtown and Adjacent Communities Plan, although we believe there is room for improvement to think more strategically, creatively, and boldly about certain elements, such as affordable housing. In general, we are excited that the plan embraces downtown Silver Spring as the right place to grow, and to grow in a way that supports connectivity, resiliency, and health.

Silver Spring is where people want to live, and we need to take steps to make sure it is somewhere that is welcoming for everyone, and that maintains and celebrates diversity. To do this, the plan needs more concrete strategies for preserving existing income-restricted and market-rate affordable housing, creating more mixed-income housing, and supporting local businesses.

The biggest area for opportunity for affordable housing involves the redevelopment of the downtown's underutilized parking garages, and that the plan should set ambitious goals to use this public land for public good, and consider models such as a community land trust. Furthermore, as recent research from the Brookings Institution shows, diverse housing types help to create diverse neighborhoods. We urge you to allow more housing types in the adjacent communities.

We are excited about proposals to create two new pedestrian connections over the train tracks, redesigning dangerous streets, and allowing for more height and density to achieve maximum flexibility in redevelopment. However, we would like to see the plan to have specific recommendations for locating new street trees, improved stormwater management, public restrooms, bike parking, and additional lighting.

Please see below for our full, detailed comments on the Planning Board's draft plan:

- **The Green Loop (2.2.2.)**

We do not believe a loop is the best design choice, given that a grid generally is more efficient and improves connectivity better than a loop. There is no reason not to include all of Colesville Road or Georgia Avenue in this vision for green, multimodal streets. In fact, that is exactly the vision outlined for Montgomery County's arterial roads and future corridor-focused growth corridors (which includes Colesville Rd and Georgia Ave) in the current PHED committee draft of Thrive 2050.

The primary component on the Green Loop or similar idea should be protected bike lanes. Furthermore, this section of the plan would also benefit from an explanation as to how the Green Loop integrates with the already envisioned downtown Silver Spring bike network.

- **District-specific recommendations (2.3.)**

Metro Center: We strongly agree with the recommendation to have the highest intensity commercial development in the Metro Center District. This district has been underutilized for far too long. The idea to have a new landmark building at the Transit Center Development Site is especially desirable, and we concur that no parking should be provided given the site's proximity to multiple modes of high-quality transit. We would like the county to encourage, partner, and prioritize space in this future development for child care, which would be convenient not just for downtown workers but for commuters on Metro and MARC.

South Silver Spring: This is clearly the district with the most opportunity for redevelopment and positive change. Within this district, we would like to see the plan also recommend making the Newell Street closure permanent and redesigning the intersection of East-West Highway, Georgia Avenue, and Burlington Avenue to prioritize the safety of pedestrians and cyclists. Newell Street's closure has reactivated Acorn Urban Park as a place for people to gather and socialize, and this is at-risk of being lost if the street is to return vehicular traffic. Finally, the specifics of The Blairs Master Plan are unclear, but should include the continued service of a full-sized grocery store for this important location.

Adjacent communities: The built form of the adjacent communities does not allow for a step-down transition with the high-rise buildings in the CBD and would benefit from gentle density, such as with three to five story buildings, connecting the CBD to lower density neighborhoods. We applaud the planners for considering allowing different housing types, but this underlying issue will not be addressed by only allowing buildings that are "compatible with the surrounding development" in terms of height and massing. These properties are appropriate for more than just house-scale duplexes and triplexes. The plan's own Housing Appendix points to the efficacy of six-plexes as a good option for lower cost multifamily housing.

Also, this plan should not rely on the Attainable Housing Strategies guidelines for downtown Silver Spring's adjacent communities because it is unclear when, and if, those recommendations will be

formally adopted. Furthermore, the AHS recommendations encourage consideration of medium-scale (three to four stories) and large-scale (four to five stories) attainable housing in master plans, such as this. Silver Spring offers one of the best opportunities for the County Council to creatively test incorporation of medium-scale housing as a transition from a downtown and as a means to offer more attainable housing options.

Finally, we strongly support the goal to maintain a mature tree canopy in the adjacent communities and would like to see more details on standards for how this should be achieved.

- **Economic Growth (3.2.)**

To celebrate and maintain the diversity of Silver Spring, it is important that its businesses continue to serve a diverse and evolving clientele. We believe this plan should include more incentives and programs that would help to develop businesses for and from within the existing community.

The recommendation from Fenton Village to ensure buildings are divided into smaller components, instead of one large, monolithic structure, should be true of the whole plan area to allow for small businesses to thrive.

- **Affordable Housing (3.3.)**

We urge you to revert to the public hearing draft's original proposal to require 15 percent moderately priced dwelling units (MPDUs) or other DHCA-equivalent affordable housing for all residential projects, rather than just Optional Method projects.

In addition, the biggest opportunity for affordable housing in the plan area are the many county-owned parking garages and lots. Any county-owned land that is redeveloped should prioritize mixed-income housing with inclusion of a high percentage of deeply affordable and affordable units (30% or more). In addition to this, publicly owned properties such as these are also a unique opportunity to try out new models for affordable housing, such as a community land trust. This goal should be restated throughout the document whenever discussing the redevelopment of public parking garages or lots.

The plan falls short in identifying where existing affordable housing should be preserved. The plan should use the department's housing preservation study, which includes a focus on this plan area, to identify which properties are most at-risk and which tools would be most helpful to preserve those units/properties.

Additionally, the plan also misses the mark on the goal to facilitate the development of a variety of housing types. If all that is allowed are large apartment buildings in the CBD and 1-3 unit homes in the adjacent communities, then the plan area will not achieve this goal. We recommend allowing more medium-scale attainable housing types in the adjacent communities.

Finally, we would like to see the plan explore potential incentives for condominium development to create more homeownership opportunities.

- **Urban Design (3.4.)**

We do not support the plan's recommendation for a Design Advisory Panel. These types of panels too often end up prioritizing subjective design opinions of a small set of residents and can lead to slower progress on redevelopment projects that are beneficial for the community at-large. We recommend creating urban design guidelines to ensure that new construction in Silver Spring achieves high-quality design standards.

- **Parks (3.5.4.)**

We strongly support a permanent closure of Newell Street to vehicular traffic and expand Acorn Urban Park, and recommend its inclusion in the plan. Even with the new plan for a South Silver Spring Urban Recreational Parklet, an expanded Acorn Park is desirable for this rapidly growing neighborhood. We are glad to see the draft recommend that Newell Street continue to function as a temporary park until the proposed South Silver Spring Park project gets implemented, but urge the Newell Street closure to be permanent.

- **Transportation (3.6.)**

Bicycle Parking: We are glad to see the plan talk about bicycle parking, but more needs to be done to identify where more bike parking is needed.

Pedestrian Network: Similarly, we are glad to see the plan recommend increasing and improving the quality of pedestrian-scale lighting, but would like to see the plan go further by identifying where increased and improved lighting is needed throughout the plan boundary.

Transportation Demand Management: We encourage a more ambitious goal for Non-Auto Driver Mode Share than 60 percent, given that a NADMS of 54 percent has already been achieved. Our recommendation is 70 percent.

Parking and Loading: Downtown Silver Spring should not have minimum parking requirements. These are costly requirements that are not aligned with climate goals. The plan should also recommend the unbundling of parking leases from commercial and residential leases so that residents can see the true cost of parking. Removing parking minimums and unbundling parking prices would help reduce the demand for parking, which in turn would help reduce the cost of construction for new housing.

- **3.8 Community Facilities**

Over the next 20 years, downtown Silver Spring should strive to be more welcoming by offering public restrooms across the plan area. This plan should recommend a strategy for identifying locations and operational options.

Conclusion: We hope that the Council will consider and include our recommended amendments.