

From: [Robert Oshel](#)
To: [Council President](#)
Subject: Testimony for Silver Spring and Adjacent Communities Plan Public Hearing, Feb. 17
Date: Monday, February 14, 2022 3:38:40 PM
Attachments: [image.png](#)

[EXTERNAL EMAIL]

Please enter the following into the record for the February 17, 2022 Public Hearing on the Silver Spring Downtown and Adjacent Communities Plan

Remove the so-called "Adjacent Communities" from the Silver Spring Downtown and Adjacent Communities Plan

The so-called "adjacent communities" are not communities and should be removed from the plan for the Silver Spring central business district. The residential areas included as "adjacent communities" are arbitrarily selected lots and blocks ripped from their natural communities only because they were within a theoretically measured distance from a transit station. Distance from a transit station does not define a community.

Communities are defined by the people who live there and typically are based on natural boundaries such as major streets or geographic features such as stream valleys; the neighborhood communities around the Silver Spring CBD have long been recognized not only by their residents but also by the county and the M-NCPPC. These neighborhoods include Woodside, Woodside Park, Seven Oaks-Evanswood, and East Silver Spring. They are all unified communities of residents. Yet as drafted, the Silver Spring and Adjacent Communities (SSDTAC) plan cherry picks individual lots or blocks from these neighborhoods and removes them from the plans for their neighborhoods and puts them in the SSDTAC plan.

The case of Woodside Park is an apt example. The SSDTAC plan picks 17 lots in Woodside Park and separates them from the rest of their neighborhood. As shown in the photo below (captured from Google Maps



satellite view), adjacent homes would be put in different master plan areas. The homes at 1000 and 1006 North Noyes Drive are in the SSDTAC plan while the home next door at 1010 North Noyes Drive and the homes directly across Noyes Drive are not. North Noyes Drive is a quiet residential street in the middle of a recognized neighborhood and by no means is a boundary between one "community" and another. Dividing neighborhoods makes no sense! It is contrary to any reasonable principle of good planning.

Why was this done by the Planning Board? Initially the Planning Board created the so-called "adjacent communities" so they could increase the housing density in them as a matter of right. This was done without regard to the objections of residents and neighborhoods, but nonetheless the Planning Board went forward. Then the Planning Board decided that densities on single family lots should be increased as a matter of right in all single family zones throughout the county -- except for the large lot R-200 zone where density could actually be increased without substantial negative impact on existing residents -- through the Thrive plan and Attainable Housing Strategies Initiative to be implemented through a Zoning Text Amendment. That rendered the Planning Board's inclusion of the so-called "adjacent communities" in the SSDTAC plan totally unnecessary to implement its desired by-right housing density increase. In other words, even if you think the densification of existing single family home neighborhoods is a good idea -- which I do not -- there is no reason to divide existing residential neighborhoods in Silver Spring to do it. Remove the so-called "adjacent communities" from the plan. Their inclusion is unnecessary, arbitrary, and detrimental to good planning for the neighborhoods.

At least the Planning Board notified the surrounding neighborhoods this time. In the Forest

Glen / Montgomery Hills Sector Plan the Planning Board adopted strip zoning along Georgia Avenue from Montgomery Hills south to the Silver Spring CBD -- an area in neither Forest Glen nor Montgomery Hills -- without notice to either the affected homeowners or the neighborhood associations. If the lots or blocks identified as "adjacent communities" in the SSDTAC plan are left in that plan, the long-recognized neighborhoods of Woodside and Woodside Park will both end up being Balkanized by inclusion of some of their lots in three separate plans. It is obviously poor planning to divide unified neighborhoods with natural boundaries that have been recognized for almost 100 years or more into three pieces for planning purposes. Not only should the so-called "adjacent communities" be removed from the SSDTAC plan, the Forest Glen / Montgomery Hills Sector Plan should be amended to remove the lots along Georgia Avenue in Woodside and Woodside Park that were strip zoned into it.

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### **Send the February 1 "Street Sections Supplement" Back to the Planning Board for Public Input, Correction, and Reconsideration**

On February 1st the Planning Board forwarded a "Street Sections Supplement" to the SSDTAC plan to the County Council. This supplement shows drawings that at least in the case of Colesville Road go well beyond the boundaries of either Downtown Silver Spring or the "adjacent communities" and go more than a half mile farther to Sligo Creek. The Colesville Road plan also appears to require taking of considerable private property along the route, although the situation is confused since the existing right-of-way is not indicated and some drawings show a right-of-way of 120 feet while Figure 10 shows a right-of-way of 100 feet even though the lanes and other areas shown actually total 120 feet. Based on measurements using a close-up aerial view of an affected property, creating a 120 foot right-of-way would require taking about 24 feet of the home's front yard, presumably through eminent domain.

In addition, the Supplement has no discussion of how the proposal for Colesville Road conforms or conflicts with MCDOT's recent "US 29 Mobility & Reliability Study" that covers the same section of roadway. Surely such a discussion is needed before the Council can make any decision on how Colesville Road should be configured even if it is determined that Colesville Road beyond the SSDTAC plan is somehow appropriate for that plan.

Furthermore, and in keeping with recent disclosures concerning the troubling lack of transparency by the Planning Board, there appears to have been no public input or review of the Streets Sections Supplement.

Prior to any consideration by the County Council, the Street Sections Supplement should be returned to the Planning Board for public input, correction of errors, and discussion of its recommendations in relation to MCDOT's "US 29 Mobility and Reliability Study."

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