

Good evening. My name is Bob Dreher. I live on Sycamore Avenue in Takoma Park.

The proposed Minor Master Plan Amendment is the most consequential planning decision for Takoma Park in decades, determining the level of permissible development for almost a third of the city and potentially increasing our population by almost 40%. If adopted as proposed, it will have sweeping consequences. Some of those potential consequences, such as the risk that the plan will incentivize developers to replace existing multi-family and affordable residential buildings along Maple Avenue, displacing existing residents, have raised serious concerns in our community about equity.

What I find deeply troubling is how little we actually know about the consequences of the proposed plan, and the complete absence of any consideration of alternative approaches for developing the hospital site or Maple Avenue. There has been no analysis of the environmental impacts of the proposed development on parkland or on stormwater. A climate analysis has just been released, showing that the development under the plan may increase GHG emissions in our area by a shocking 78%, but it came so late in the process that it was not considered by the Planning Board in approving the plan. There is still no analysis of the potential traffic impacts of this development, or the impacts on our city's infrastructure and schools.

Perhaps most troubling, there is no analysis of the socio-economic impacts of the development contemplated by the plan, including the critical question of potential displacement of current residents, even though our community has repeatedly raised that concern. And there is no comparative analysis of alternative zoning schemes that might achieve our societal goals with less adverse impacts.

When I have asked about the lack of information regarding environmental and social impacts, I have been told that impact analysis would be done when developers submit specific proposals, and that we won't know what the level of development will be until then.

That doesn't make sense to me. I'm an environmental lawyer and have spent much of my career working on federal planning and decision-making for public lands and natural resources. The federal decision-making process is guided by the National Environmental Policy Act, which requires federal agencies to consider – and disclose to the public – the environmental impacts of their actions before making a decision. The heart of that process is the evaluation of potential alternatives to a proposed action. It is only through a comparison of alternatives and their comparative environmental impacts that government decision makers, and the public, can make an informed decision about the best course of action.

I realize that NEPA applies to the federal government, and not to municipal planning, but the basic principle of examining environmental and social consequences before acting – looking before you leap – should apply to any rational planning process. In the present case, Takoma Park and Montgomery County are about to make a major decision with serious consequences for our community – determining the legally permissible levels of development for a huge tract of our city. That zoning decision will inevitably determine at least the general density and character of development in this area for the future, even if the fine details will depend on the specifics of the projects that developers propose. Developers will expect to – and have the legal right to – develop their land up to the maximum allowed by the applicable zoning. So this is a real and binding choice we and Montgomery County are about to make about the future of our community.

Yet we are asked to make this momentous decision without any information about the likely impacts of this level of development on stormwater, on our schools, on traffic, on noise and air pollution, and on greenspace, and with a devastating climate analysis just released and not considered by planners.

And we have no information on what an alternative zoning approach might lead to. What would Takoma Park look like in 10 years under zoning that prescribed lower density, lower building heights, more residential character, and more green space than the current plan?

We don't know the answers to these questions.

I find it astonishing the county planning process would put our city in this position. I urge the County Council to reject the current minor master plan amendment until analysis has been provided showing all of us what will likely happen to our community under the County's planning staff's proposal to promote high density urban development here, and comparing that to what a future Takoma Park would look like if zoning focused on more moderate development.