

# Friends of White Flint

Promoting a Sustainable, Walkable, and Engaging Community

P.O. Box 2222, White Flint Station, Kensington, MD 20891-2222 301-984-1200

## Statement of Friends of White Flint, Inc.

on the

### Annual Growth Policy

September 21, 2009

#### INTRODUCTION:

Where will Montgomery County be in twenty years? We already know some of the answers: more people, more jobs, more things to do, less focus on D.C. The big question: how do we accommodate that change in a very green and strategic way?

The Adequate Public Facilities Ordinance and the Growth Policy review process are welcome attempts to address that question for the County as a whole. The White Flint Sector Plan demonstrates how the County can answer that question in the context of one specific part of the County. One major difference between the two analyses is that the White Flint Sector Plan is a very precise, holistic approach to a sustainable community, tailored to the facts of one particular area.

Perhaps the most important innovation in the ground-breaking White Flint Sector Plan's analysis is that the range of public facilities and needs which were included and balanced in the White Flint Plan was much broader than are measured in the AGP process. The White Flint Plan did consider, for example, congestion at local intersections (the hallmark of the AGP process), but also considered how best to move traffic through those intersections. Not just "fast," but "best." "Best" also included walkability, sustainability, and community amenities – in short, quality of life in the surrounding community as well as congestion. In AGP terms, the breadth of "public facilities" reviewed was considerably wider, as was the definition of "adequacy."

Friends of White Flint strongly supports the Planning Board's attempt to broaden the AGP process beyond traffic congestion to assess other measures to insure a high quality of life in the County. We urge the Council to adopt this expansion of the AGP process to include sustainability, urban design, and other elements which actually gauge the adequacy of public facilities on more than a few, narrow measures.

Montgomery County needs to know how congested its intersections may be, but quality of life in this century is not measured by how fast cars move around town. Modern urban planning recognizes that reducing congestion is only one element in urban

design, and that reducing our environmental impact may require a much more targeted approach, particularly in areas which are being transformed into sustainable, walkable communities.

We believe the White Flint Sector Plan illustrates that Montgomery County can do this, that we can engage in a modern, sustainable urban planning effort. The White Flint Plan is a specific set of innovative answers that adapt sustainable and engaging ideas proven in other communities to a White Flint-specific walkable community plan.

Friends of White Flint's comments on the Annual Growth Policy relate solely to the section dealing with White Flint, and with the effect of the AGP on the White Flint Sector Plan. These are principally the recommendations on Page 45 of the Planning Board's AGP draft. We have specific comments at the end of this Statement.

Friends of White Flint urges the Council to respect the White Flint Sector Plan, with its comprehensive quality of life analyses, and its specific, targeted improvements.

## FRIENDS OF WHITE FLINT:

*Want to Know What's Going to Happen in White Flint?*



## White Flint Town Hall

The Montgomery County Council is considering a new master plan to guide growth in White Flint for the next twenty years. The purpose of the White Flint Sector Plan is to change White Flint from an automobile-clogged suburb into a vibrant, transit-oriented, sustainable urban center. *Want to know more?* Come to the White Flint Town Hall meeting on September 23, 2009.

Royce Hanson, Chair, Montgomery County Planning Board,  
Presents

### the White Flint Sector Plan

Moderator: John Robinson, former Vice-Chair, Planning Board

Wednesday, September 23, 2009

7PM (Doors open at 6:30PM) to 9PM

Nuclear Regulatory Commission Auditorium

11545 Rockville Pike, P-1 Level (entrance at rear of building)

More info: [www.townhall.whiteflint.org](http://www.townhall.whiteflint.org)

The White Flint Town Hall is a project of Friends of White Flint, [www.FriendsOfWhiteFlint.org](http://www.FriendsOfWhiteFlint.org)

Friends of White Flint is a nonprofit corporation promoting a walkable, sustainable and engaging community in White Flint. We started in 2007 as a small resident and community organization primarily interested in parks, family and bicycle issues: "fun, families and fitness." This year we added businesses and property owners as members.

Our members include the largest community groups, businesses, employers, and property owners in the White Flint area, representing many thousands of residents and workers. Our members include the five neighborhoods which make up the Randolph Civic Association, the Wisconsin condominium community, the Fallstone, Georgetown Village, Old Farm, Tilden Woods, and Walnut Woods community groups, the U.S. Nuclear Regulatory

Commission, M&T Bank, Federal Realty Investment Trust, JBG Companies, and the Action Committee on Transit.

Our principal activities are public education and outreach, and promotion of a new, sustainable White Flint. Every day, as many as 1300 people visit our web

publications and sites. [www.whiteflint.org](http://www.whiteflint.org). We handed out thousands of brochures on renovating Rockville Pike and New Urbanism design at the April Pikes Peak road race.

We also hold seminars and events on urban planning and design, smart growth and New Urbanism. In May, we hosted Chris Zimmerman, Chairman of Metro and a member of the Arlington County Board, to speak about our neighbor's successful efforts to convert a traffic-clogged, parking-lot covered suburb into a transit-oriented, smart growth area, where 11% of the land-area supplies half the county's revenues. Tomorrow we are sponsoring a White Flint Town Hall, where Planning Board Chair Royce Hanson will present the White Flint Sector Plan to the community; former Board Vice-Chair John Robinson will moderate the audience question-and-answer session. This Friday, we will co-sponsor a Smart Growth discussion with former Governor Parris Glendening and U.S. Environmental Protection Agency Community Development Policy Analyst John Thomas. Councilmember Roger Berliner will moderate the discussion.

Our Board is composed of one-third residents and community groups, one-third businesses in White Flint, and one-third property owners. We use the successful model of a resident-business-property owner partnership pioneered by the Clarendon Alliance and Rosslyn Renaissance in Arlington County. Our Board meetings and policy adoption processes are open to public participation. This Statement, for example, was put on our blog – the FLOG – for comment before it was finalized.

Friends of White Flint strongly supports adoption of the White Flint Sector Plan, recently approved by the Montgomery County Planning Board. On July 1, we provided a comprehensive set of recommendations to the Planning Board prior to its adoption of the Plan, and many of those recommendations were included. We will have specific recommendations for improvements in the Plan at the Council's public hearings on the Plan in October.

### **WHITE FLINT:**

White Flint is one of the areas in the county in which redevelopment offers major environmental and community benefits, in addition to an estimated \$2.1 billion in additional County tax revenues over the life of the Plan. There is limited space for new development in White Flint, so the focus must be on transforming the area through redevelopment.

White Flint is also one of the areas in which redevelopment is sorely needed. White Flint has few residences. There are nine jobs for every residence in White Flint. This is significant, since people who work and shop close to home drive less, producing less carbon and less traffic congestion. The County aims for a ratio closer to 1.2 to 1.





White Flint is neither walkable nor pedestrian-friendly, so people must drive everywhere. As a result, White Flint is clogged with traffic, and not just during rush-hour; traffic on weekends is horrendous. All that traffic spews tons of carbon into the air. The roads are bordered by miles of overhead wires, drooping low, in some cases obscuring the traffic signals, and certainly blocking any views of the surrounding community. And the acres of parking lots are a stormwater nightmare; White Flint is almost entirely paved over, and has almost no stormwater management.

And what is worst about White Flint? It is unsafe for pedestrians. Pedestrians are rare on the Pike; drivers do not look for pedestrians.

In this design, the automobile is king. This design was created when gas prices were low, and environmental concerns were low priorities. Neither of those are true any more.



It is the existing architecture and design of White Flint which causes this problem. There is really one current reality for White Flint, left over from the last century: Strip malls, kneeling behind acres and acres of grey, lifeless parking lots, baking in the summer heat, mounded by dirty ice in the winter.



Mid-Pike Plaza, for example, which anchors the northwestern corner of the Sector, is typical: designed decades ago when the car was king, acres of parking lot front three major roads, while the stores huddle far inside the huge block. Almost no one walks to Mid-Pike Plaza.

But look at the parking lot in this picture. It's a busy place, even in non-holiday periods, and there is little economic incentive for a change at Mid-Pike Plaza.

### **WHITE FLINT MEETS CURRENT STANDARDS:**

White Flint today is not an accident, not random sprawl. By placing auto throughput ahead of pedestrian safety, Montgomery County has created an inhospitable, unattractive public realm at White Flint. While the approved 1992 North Bethesda Master

Plan envisioned mixed use development where workers and residents would take advantage of mass transit, by not overhauling the streetscape standards and designs to make the streets pedestrian friendly, the plan never delivered on the vision. The 1992 Master Plan didn't utilize the tools or the examples from across the country and around the world which we have today. Quality of life, air, water and other natural resources and climate change were an afterthought.

The current County standards by which we measure White Flint suggest that the area is fine. According to the Planning Board, Rockville Pike is not significantly violating county requirements.



There is something wrong with using a measure for White Flint which does not take into account the environmental, pedestrian, and community problems which everyone recognizes plague it. This is the “emperor has no clothes” – in Montgomery County.

We simply can't afford to predicate our growth policy solely on how fast traffic moves through intersections. Our growth tests should also measure how safe pedestrians are in those intersections and on our streets.

### **CARBON AND SUSTAINABILITY – THE NEW TESTS OF ADEQUACY**

In addition, our tests must change to meet new legal requirements; we must consider other factors as equally or even more important. Montgomery County must, by law, reduce its carbon footprint. This is not just the law; it's the right thing to do. But it is the law, and every day our problem gets tougher to solve.

We must recognize the impact of that over-arching requirement on the AGP process, designed, as was White Flint, when the automobile was king. The principal determinant of the adequacy of our public facilities will increasingly be whether we are offsetting our carbon emissions. Carbon emissions are exceedingly difficult to reduce, but one area where they can be reduced is by good urban design and planning. This is a major shift in priorities and viewpoint, and it requires looking far beyond traditional traffic congestion measurements. For example, sustainable design and construction can help reduce the approximately 40% of greenhouse gases produced by buildings.

The AGP process measures, in large part, how fast cars can travel various routes. This is an automobile-oriented test, which does not take into account sustainability factors, except indirectly. The earliest versions of the AGP were not so traffic-oriented, and the AGP was viewed principally as governing water and sewer capacity.

The AGP must be transformed, re-directed away from its automobile bias, if it is to have relevance in this century. The AGP, perversely, inhibits some of the urban design which can help solve our carbon problem. Congestion at intersections should not be the



only measure of the adequacy of public transportation facilities. Walkable communities, which do not generate as many actual car trips, may be quite congested, as part of the design is intended to slow traffic. We must take a holistic view of the adequacy of public facilities.

Density, alone, and congestion, alone, are not negative factors if sustainability is considered. In many ways, denser development meets modern sustainability goals. People who live closer to where they work don't drive as much; people who live closer to where they shop don't drive as much. People who don't drive as much do not contribute as much to traffic congestion or carbon emissions.

Dense development is also walkable, and if planned for the differently-abled, can be a liberating place for people to live. In the 1950's the automobile was touted for the "freedom of the roads" it brought. Now we see that the automobile also brought societal costs. Walking is the new "freedom." Freedom from carbon, freedom from hours in traffic, freedom from obesity, freedom from the isolation which the automobile fosters.

All of these considerations are in play in the new White Flint Sector Plan. Compare, for example, the redevelopment plan for Mid-Pike Plaza, shown above as emblematic of old design features. It is very tall and dense, but it also is mixed-use and "green," with living features which will mitigate, without further action, much of the environmental and traffic problems which more sprawling, low-density development would generate. It is close to Metro and other forms of transit. It fronts two pedestrian-friendly thoroughfares, including the redesigned Rockville Pike. And it would generate hundreds of millions of dollars in tax revenues for the county, including millions of dollars in impact fees.



Which would you rather have in White Flint? Acres of parking lots? Or a walkable, sustainable, transit-oriented community, which is admittedly densely-built and tall, but for the right reasons?

In sort, transforming even a portion of White Flint in this manner has dramatic societal benefits, particularly in the area of sustainability. Yet this transformation is not measured adequately by the AGP process. What does it matter in this development if traffic is slowed, if overall quality of life is enhanced throughout the region.



Thus, we strongly support revising the AGP process, as suggested by the Planning Board, beyond traditional measures of traffic congestion and school impact. There are other ways to measure whether public facilities are adequate besides just traffic congestion and school populations. The Growth Policy should consider other quality of life issues and sustainability. We applaud the Planning Board for doing this in the current review process.

### **THE AGP PROCESS MAY EXACERBATE THE PROBLEM:**

We would go a bit further: the AGP process itself should be considered part of the carbon offset efforts of the County. It should be part of the solution to the environmental and societal problems in White Flint. Right now, it might be part of the problem.

For example, Mid-Pike Plaza, described above, is economically viable right now. The owners have little incentive to improve. It will cost a significant amount, not just to renovate, but also to take the existing facilities out of service during the transition. Imposing a moratorium on development, as the AGP does, would do nothing to stimulate the type of sustainability improvements needed at Mid-Pike Plaza. All a moratorium would do is keep the parking lots, the overhead wires, the stormwater run-off, the traffic in place in White Flint, as pressures build in other areas of the County.

Concerns expressed solely within the AGP process about the White Flint Plan, addressed in more detail below, do not consider this problem. In fact, they may exacerbate it. If there are no public funds to make these transformations for needed environmental changes (and there is no such County money in the foreseeable future), a decision to delay or penalize development in White Flint means no improvements.

The AGP should not just be a blunt weapon blocking all development if intersections are congested. The AGP should reflect a comprehensive understanding of public facilities, of adequacy, and of quality of life. And its remedies, not just its analyses, should reflect that holistic understanding. If, for example, an area provides certain benefits, such as environmentally sustainable architecture, LEED qualifications, and the like, traffic mitigation is less vital.

The best solutions may be incentives, rather than mandates and moratoria. The solution is not to stop growth, but to redevelop and improve. It does little good to stop growth in White Flint if the result is that environmental damage continues. It would be better to have the RIGHT KIND of growth: sustainable, engaging, family-friendly, transit-oriented. That kind of growth can reduce traffic, lower environmental impact, improve sustainability, and slow or reverse the trends in carbon emissions.

This approach leads precisely where neighborhoods across the country are headed: growing smarter, more compact and strategically. There will be growth in Montgomery County, and in White Flint in particular. We have only four percent of the County left that can be developed, which means we must focus our efforts on what will actually happen in the future. We are not going to build big new roads, we are going to look at redevelopment.



But we can replace carbon-generating sites with sustainable ones. We can use structured parking instead of surface lots. We can encourage mixed-use development to reduce driving requirements. We can envision grids of streets instead of a few central arteries. We can have 300-foot-long walkable blocks instead of 3,000-foot “super-blocks.” We can build charismatic places in Montgomery County which draw people in, instead of focusing on moving traffic to

and from D.C. In architecture columnist Roger Lewis’s characterization, we can look at a grid instead of spokes on a wheel.

Our task, distilled to its essence, will be to get more people living, working, and shopping in the same place. That will reduce driving, encourage exercise, and increase quality of life as it gives people more time out of their cars. That is how we help solve our carbon crisis, our traffic crisis, our economic crisis. It’s not the total answer, but it is an answer, and it is within our grasp, if we focus on the right kind of growth.



In short, we want to change behaviors, not keep environmentally-destructive habits. We must change people's outlooks so that the automobile is no longer the focal point of their daily activities. We want people to recognize the value of living, working and shopping in their own neighborhoods, but in order to do that, we must provide the built environment that makes those local options a viable choice.

### **LESSONS FROM ARLINGTON COUNTY:**

Arlington County faced exactly the same dilemmas in the 1960's and 1970's. Arlington took a new approach to its car-oriented, parking lot-laden transit corridors. Arlington focused development on areas where transit was available, and provided incentives for modern development. The results were dramatic.



Chris Zimmerman, a member of the Arlington County Board, and then Chairman of Metro, spoke to the inaugural session of the Friends of White Flint's Speakers' Series last May. He pointed out that, as a result of its smart growth policies, Arlington has quadrupled its density but traffic congestion has decreased. Arlington has much lower car ownership and higher transit usage rates than comparable areas around Washington, D.C., even though the income levels are quite high.

Arlington also has the lowest tax rate in the D.C. area, since the high-density areas (which make up one-tenth of the county) provide half the county's revenue. Outside the county limits, about 58% of Metro riders take cars to the stations, but within Arlington County 73% get to Metro on foot. Even off-peak Metro ridership is high within Arlington.

Arlington County used incentives, not mandates or moratoria, to encourage private development in the areas around Metro. And it worked, without damaging surrounding communities. Despite boosting density substantially within the planned corridors, just outside the corridors, the "density is the same as 50 years ago, with single-family houses and older neighborhoods. It was the deal we made: preserve the neighborhoods a quarter-mile away from Metro."

Zimmerman stressed three principles for smart growth centered around a Metro station:

- 1) **The "vital quarter mile."** 75% of transit riders walk 1/4 mile to get to the Metro. 90% comes from 1/2 mile. To put more people into an area without increasing traffic congestion, put the largest number of residents and workers within that distance to the Metro station.

2) **Mixed use.** The neighborhoods only work if they are mixed-use. Mixed-use residential, commercial and retail neighborhoods offer an “18-hour day, which makes better use of your investment in transit.” Montgomery County has a huge investment in its Metro system, including the White Flint Station, and putting the most people close to the Metro station maximizes the potential use of that investment.

3) **Designed for pedestrians.** “If it isn’t walkable, it isn’t workable.” Arlington replaced a focus on the automobile with a focus on pedestrians, and new communities bloomed. White Flint is not walkable now; the Plan would make it walkable.

### THE WHITE FLINT SECTOR PLAN:

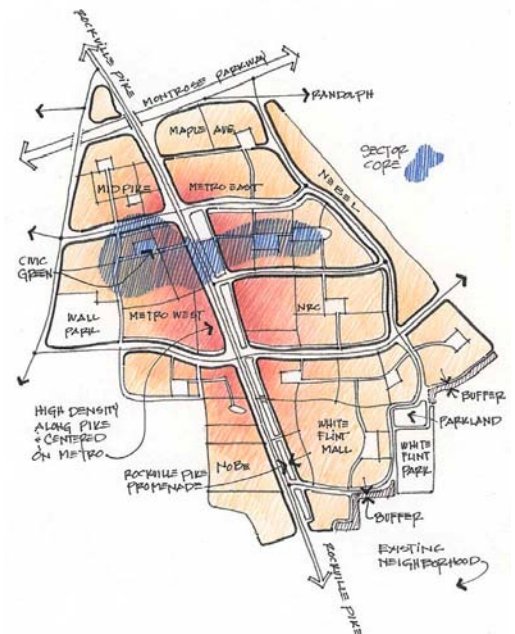
Those are the principles embodied in the proposed White Flint Sector Plan. For the first time, we have a predictable, precise, efficient and sustainable plan for White Flint development which meets not only the previous, car-oriented AGP tests, but also the broader, walkable and sustainable quality of life concerns in modern urban planning.



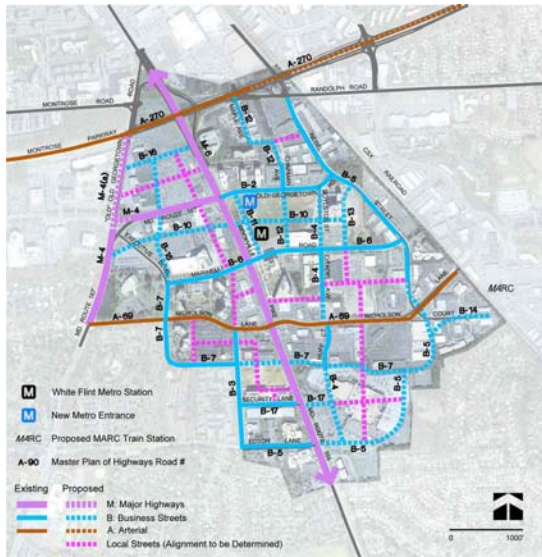
The White Flint Sector Plan is the result of three years’ work. Beginning in 2006, the Montgomery County Planning Board involved hundreds of County residents in design meetings, discussion groups, and work sessions. Nonprofit and private organizations greatly multiplied those meetings; in total, the public and private organizations have held more than 100 meetings on the White Flint Plan. Thousands of county residents have been exposed to the White Flint Plan, through outreach efforts such as booths at the Pikes Peak road race, seminars and public presentations such as the Friends of White Flint Speakers’ Series event described above, and Friends of White Flint’s Web programs, which are viewed by hundreds of people every day.

The result is a broad public consensus on the major features of the White Flint Plan: “urban core”, transit-oriented, sustainable, walkable, mobile. This vision was articulated at the first public meetings, and has carried through to the Planning Board’s proposal before the Council today.

The White Flint Sector Plan centers White Flint around an “urban core” at the Metro Station, with active public spaces, streets, public parks, and plazas. The Plan requires walkable streets, constructed for pedestrian safety and interest, with residences and local services. Two

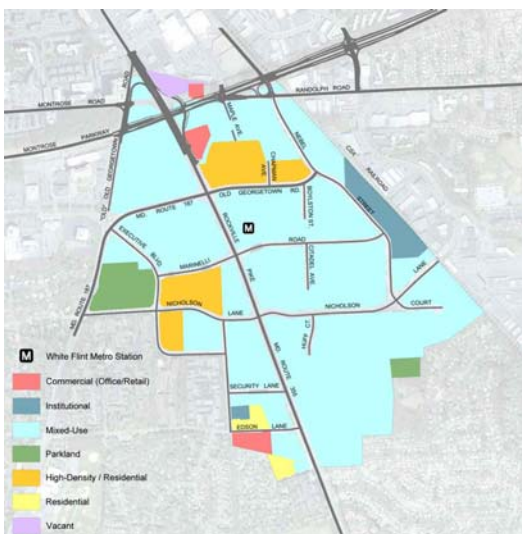


intersecting Promenades, an east-west section along a new Market Street, north of the existing Conference Center, and a north-south section along Rockville Pike, will provide a unique environment for walking and biking.



The key to transforming White Flint is reconstructing the existing street network, especially along Rockville Pike, and using pedestrian-friendly design. Rockville Pike, transformed into a grand boulevard, will tie together the east and west sides of White Flint instead of dividing it. The exact design to be used to reconstruct Rockville Pike is still to be determined, but there is a broad consensus about the need to remake the Pike into a pedestrian-friendly, transit-centered boulevard. Sidewalks, bikeways, trails, and paths will provide pedestrian circulation and connections to other communities.

The transit system remains focused on the Metro station, but will expand to include local as well as circulator bus service. Friends of White Flint strongly supports some form of vehicular rapid transit on the Pike, especially if it is part of a County-wide system. Some outlying communities are considering providing “jitney” service on demand. A new commuter rail station will help tie the historically-underserved low- and moderate-income communities to the east of the Sector into the new economic activity in the core area.

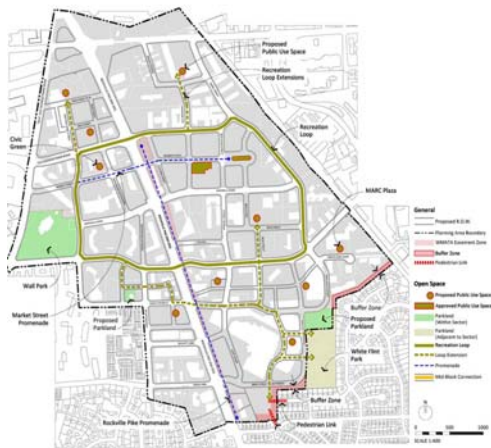


The Plan’s goal is to mix residential and nonresidential uses. White Flint currently has very few residences. Residential development reduces traffic, creates neighborhoods, and helps meet the County’s goal of improving the jobs-housing balance in the I-270/MD 355 Corridor. The existing 1992 Master Plan permits more than 8,700 new residences in White Flint, without the sustainability incentives provided in the White Flint Sector Plan. The White Flint Sector Plan would increase the number of residences to 14,000, but would provide

incentives to make those developments mixed-use, sustainable, and consistent with new quality-of-life incentives.

The Plan will limit building heights in White Flint. The 1992 Master Plan which currently regulates White Flint density has no limits on building height.

The Plan concentrates growth around the Metro station, to maximize the County's investment in transit. The tallest buildings, with the greatest number of residents and workers will be within a quarter-mile of the Metro station. Densities and heights are lower away from Rockville Pike and the Metro station. The lowest density and heights are located at the edges of the Plan area where they provide a compatible transition to the adjacent residential communities.



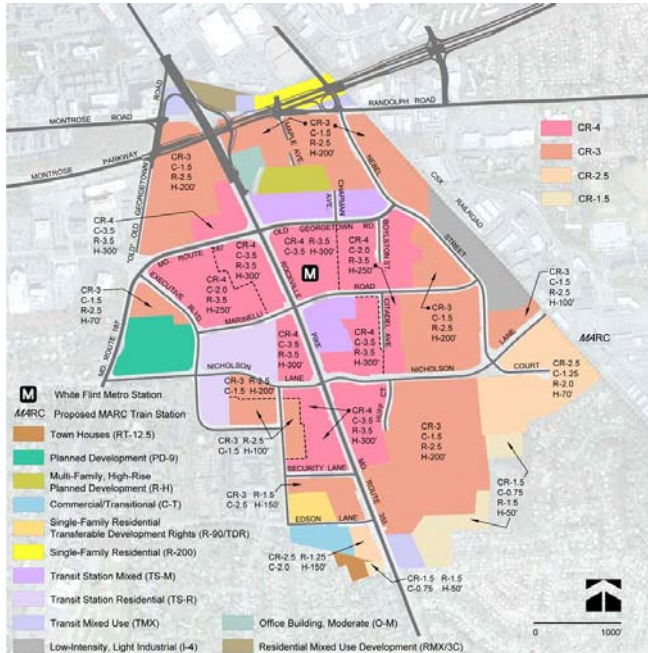
The Plan recommends one new park, an expansion of an existing park, enhancements to a third park, and a series of six neighborhood parks throughout the area. The new park, the Civic Green, will be located in the core area. White Flint Neighborhood Park will be expanded, and the existing surface parking lot at Wall Park will be relocated to provide space for more recreational uses. The parks will be connected through a series of paths and trails, including a Recreational Loop. The Plan proposes an integrated network of bike paths and trails.

The White Flint Plan is incentive-based. The CR Zone, designed originally for White Flint, is innovative, providing a low base FAR and then adding incentives for community and sustainability amenities, such as green roofs and day care centers.

The compact, walkable, and green White Flint accommodates new residents and business while reducing land consumption and vehicle miles travelled, improving carbon footprint, and protecting water and air quality. The innovative zoning system developed for White Flint will provide incentives to incorporate green building technology and environmental site design while reinforcing current environmental regulations.

## THE WHITE FLINT PLAN UNDER THE AGP:

The proposed White Flint Sector Plan is not perfect. There are several areas which could be improved. Some of those proposed improvements affect the pace of growth, which is also the focus of the AGP process, such as accelerating the reconstruction of Rockville Pike, placing utilities underground, and coordinating growth with Metro improvements. On the whole, however, we strongly support the White Flint Sector Plan, for all of the reasons described above. We want to see the Plan approved and implemented as fast as possible.



The White Flint Sector Plan has considered the elements reviewed under the AGP process, and much more. It is a comprehensive, holistic review of the adequacy of public facilities now and in the future. It makes projections about needs and problems, as do all such plans, but the White Flint Plan is unique in the degree of sophistication and detail in these projections. For example, not only does the White Flint Plan project growth in overall numbers, it includes specific height limits, mobility improvements, compatibility protections for nearby neighborhoods, and incentives for mixed-use and green design.

Even more important, this is one of the few times when a number of the major stakeholders have committed, in advance, not only to specific development projects (shown in detail on our website), but also to self-taxation and financing mechanisms. These funding mechanisms go far beyond prior efforts in earlier plans.

This is the most sophisticated planning effort in County history, with tremendous public participation, extensive consulting and professional support (in addition to the Planning Board's own staff), cooperation between all three major groups of stakeholders (residents, businesses, and property owners), and a broad and deep consensus on solutions. We are thus quite concerned that the less precise, less sophisticated, automobile-centered AGP process is being considered as a reason for delaying the White Flint Plan.

We and other organizations have held more than 100 formal and informal meetings on the Plan



over the last three years, and thousands of people have been educated about the Plan through outreach events. Based on our interactions with these participants, we believe the vast majority of those residents and workers support the Plan. Friends of White Flint, the vast majority of the Planning Board's White Flint Steering Committee, and many other organizations, all have expressed their support in writing.

Now we would like to address some specific concerns which have been expressed to the Council about the White Flint Plan during the AGP process, including by the County Executive.

**1) Use of PAMR and Other AGP Tests in White Flint:**

The proposed 2009-2011 Growth Policy has been criticized on a number of grounds for use and non-use of various tests. The County Executive, in a September 15, 2009, letter, for example, criticized continued use of the "Policy Area Mobility Review" as a "fundamentally flawed" test. One resident organization criticized the failure to use PAMR in White Flint. In both cases, the criticism was that the use or non-use of PAMR could adversely affect the quality of life in the County and in White Flint.

Our position is that the White Flint Plan has incorporated all of the concerns addressed in the AGP process, including through PAMR, and much more. The more limited, less-advanced AGP process, even incorporating the Executive's proposed new measure, should not be used to slow needed changes in White Flint, or the result might be that White Flint does not change at all. The effects of failing to change would result in much more disruption to the County and its communities than would any problem identified in the AGP process, with or without the use of PAMR.

**2) Pacing of Change in White Flint:**

Again, both the Executive and a resident organization have criticized the proposed Growth Policy for failures, this time in the pacing of improvements. The Executive has said that it is "premature to change the White Flint APF approval process before the Council has acted on the White Flint Sector Plan." The resident organization complained that development will be permitted before the needed infrastructure is in place.

Friends of White Flint has long been on record, as has been the White Flint Advisory Group from which we sprang, as supporting development in White Flint only when the planned infrastructure was adequate to support it. The Advisory Group in its September 2008 Final Report to the Planning Board described its position: "The Advisory Group will support certain levels of density necessary for development but only in conjunction with the infrastructure necessary to protect against congestion." Friends of White Flint, along with the Advisory Group, believes that infrastructure must be programmed with development.

The AGP process is not so much concerned with the type or amount of development, as the pacing of development. The pace of development in White Flint has been the subject of substantial discussion by the community, the Planning Board, and the Executive. We anticipate that the schedule and pacing of development will be a significant part of the Council's discussion on the White Flint Plan. The pace of development in the White Flint Plan is derived from a variety of inputs, not just the adequacy of public facilities, all of which are balanced delicately to provide the most to the community for the least in County resources.

Friends of White Flint supports the recommendation in the AGP to use the well-coordinated infrastructure phasing and staging plan as recommended in the White Flint Sector Plan, rather than older tests. The mobility recommendations in the White Flint Sector Plan are much more robust and effective than what could be achieved under more typical traffic mitigation on a project-by-project basis.

Some major problems in White Flint, such as a new Rockville Pike could not be achieved without both coordination among land owners and a funding source. It's unrealistic to expect property owners in White Flint to agree to tax themselves for a large portion of the costs of infrastructure improvements and yet still be subject to additional mitigation requirements. It is also unfair to penalize White Flint's transit-oriented development near a Metro station because of traffic and mobility problems elsewhere in North Bethesda, caused by development which is not transit-oriented or sustainable.

In addition, while we appreciate the concerns of the County Executive regarding making modifications to an AGP prior to approval of a Sector Plan, we believe this can be addressed by simply adding a trigger mechanism so that the modification does not go into effect until the plan has been approved.

Thus, our position is that this is an important question for the Council to consider, but that it is not "premature" to consider the White Flint Plan and the improvements which everyone agrees are necessary to resolve the very problems identified.

### **3) Expansion of the White Flint Sector Beyond the MSPA:**

Another concern raised about the White Flint Sector Plan is that the area covered by the Plan is larger than the Metro Station Policy Area established in earlier growth reviews. The White Flint Sector is larger than the relevant MSPA, but that is how such master plans have been crafted and considered in the past. The White Flint Sector was established as part of a public participation process involving the amendment of the 1992 Master Plan; changing the area, as some have suggested, would likely have some legal ramifications.

In addition, the White Flint Sector was reviewed as a whole during the extensive three-year drafting process. Changing policy and reducing the area to meet an

automobile-centered, less-sophisticated AGP standard doesn't seem justified by any reasonable measure. Friends of White Flint recommends that the Council respect the White Flint Sector Area as determined by the Planning Board's three-year development process.

#### **4) Transit Capacity:**

One criticism of the White Flint Plan seems to be that it relies on Metro to meet its growth and service projections, and that Metro is unreliable. There is some truth to this concern, as recent events have amply and tragically demonstrated.

The White Flint Plan, like all such modern plans, depends in large part on the success and performance of transit systems. If Metro, for example, cannot provide sufficient cars on the Red Line, the trains will be crowded. If Metro breaks down or has an accident, the alternative for long-haul commuters is the automobile. This is a dependency which cannot be avoided in an era when there is not enough funding to provide stand-by transit systems for the long-haul commuters.

The White Flint Plan does not offer an alternative for Metro breakdowns or inability to maintain service in the face of expected growth. Yet, the Council must decide where the responsibility for protecting against such a breakdown lies. Is it with the planning process; if so, must the County assume that Metro will fail? Or is it with Metro, which should be pressed, through all appropriate channels, to provide the safe, regular and consistent performance we all thought we paid for?

Friends of White Flint strongly urges the Council, through appropriate mechanisms, to monitor and supervise Metro, to the extent possible, to ensure that it is meeting its responsibilities under the projections implicit in both the AGP and the White Flint Plan. Because the White Flint Plan operates over a much longer timeframe than the AGP review process, it is more likely that the Council will be able to identify and correct any Metro failure before it adversely affects White Flint, but such correction will be much easier if monitoring identifies failures before they occur.

There is an alternative or supplementary action which the Council should support: the Sustainable Transportation Corridor concept. Councilmember Berliner has spearheaded an effort to have Rockville Pike through White Flint declared an STC. Friends of White Flint has actively supported this designation. Having the Pike declared an STC does two things: a) provides the potential for more transportation funding, and b) provides an intergovernmental interface with Metro to coordinate sustainable transportation. Friends of White Flint strongly urges the Council to support Councilmember Berliner's STC designation of Rockville Pike.

### **5) School Capacity:**

Schools are a vital element in the success of any community, and the proposed new White Flint is no exception. The subject of schools, facilities, borders and other factors has been, as the former White Flint Advisory Group put it in its September 2008 Final Report, “a contentious issue, which has arisen in virtually all meetings with community members.” This is still true today, as schools have been discussed repeatedly, and often heatedly, in almost all the meetings we have participated in on the White Flint Plan. We know that many members of Friends of White Flint are engaged in active discussions of these and other school-related issues, and we don’t want to pre-judge the results of these discussions. We have not taken an organizational position on most detailed school-related issues.

One criticism recently raised is that the White Flint Plan will permit over-crowding in County schools in the next sixteen or twenty years. We have been informed that MCPS has considered White Flint school population growth in its projections. We have not done any independent reviews to evaluate those projections. We point out only that the White Flint Plan will generate approximately \$50 million in impact fees, which we hope would be used to alleviate any school crowding.

We also point out, as we have since the beginning of the White Flint planning process, that MCPS has several vacant schools, including elementary, middle and high schools, which are now used only as “holding” or other facilities, in the White Flint area. Use of these facilities as “holding” facilities while other schools are renovated has resulted in some White Flint communities being over-crowded by school buses; Tilden Lane, for example, sees almost 100 buses a day moving children through neighborhood streets to the former Tilden Middle School. Using these facilities for non-White Flint purposes made sense when White Flint had no residents. MCPS could reconsider its use of these facilities in the future.

Another criticism is that the White Flint Sector Plan will cause redistricting or other changes in the schools. Friends of White Flint requested that this portion of the Sector Plan be reviewed and revised, and we will urge the Council to do so when it considers the White Flint Plan. We don’t believe this issue is part of the AGP process.

### **CONCLUSION:**

The White Flint Plan has earned its special consideration in the growth regulation process. Having crafted a Plan for the 21st Century, we implore the Council to recognize the special character of the process and the results in White Flint. We urge the Council to recognize that the White Flint Sector Plan has been carefully drafted to meet the needs of the County. We hope the Council will support the White Flint Sector Plan and not allow criticisms of the AGP process to be used to block this multi-year effort.