

Nov. 20, 2013

The Hon. Elizabeth M. Hewlett, Chairman Prince George's County Planning Board

The Hon. Andrea Harrison, Chairman Prince George's County Council

c/o The Clerk of the Council County Administration Building 14741 Governor Oden Bowie Drive Upper Marlboro, MD 20772

RE: Preliminary Plan Prince George's 2035 - The Prince George's County General Plan

Dear Chairs Hewlett and Harrison, and members of the Board and Council:

Please accept these comments on behalf of the Coalition for Smarter Growth. The Coalition for Smarter Growth is the leading organization in the Washington, D.C. region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We want to express our overall support for this outstanding document. We commend the Planning staff and Planning Board for the deliberative process that has culminated in the Plan Prince George's 2035. This plan offers the right framework -- with a few exceptions -- to guide the county's growth and development to a successful future.

We applaud the many important policies and guidance the plan puts forth including:

- Focusing future growth around transit stations and revitalization areas inside the Beltway;
- Priority Investment Districts (PIDs) we especially commend the staff and Board for the thoughtful process to create this targeted, strategic approach to using the County's limited resources to the greatest benefit. We agree that starting with a short list of 2, or at most 3, districts for public investment is the best way to achieve countywide goals. We urge the Board and Council not to undermine the discipline of this approach for parochial interests. All Council districts will be better served by a more strategic and targeted approach to the use of limited resources. Spreading resources thinly will not accomplish the success we seek for all Prince George's residents;
- Designation of 8 Regional Transit Centers beyond the 3 PIDs, we commend the plan's approach of designating eight regional transit centers for focusing the majority of the county's growth in jobs and households;
- We agree that the employment areas, especially those that overlap with transit centers are an appropriate focus for the plan;
- Focusing the Capital Improvement Program (CIP) we applaud the plan's attention to this critical 316 F STREET NE | SUITE 200 | WASHINGTON, D.C. | 20002

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element that has been in conflict with policy statements supporting transit-oriented development and reinvestment. The CIP often devotes far too many resources to supporting new sprawl development and starves needed investment in existing communities. We urge the Board and Council to ensure that the CIP is truly allied with the plan's priorities. Maintaining this discipline is the best way to leverage limited resources to realize the county's aspirations to attract more businesses and build a stronger tax base;

- We agree with the recommendation for transportation to use multimodal performance measures. We ask that this transition be done quickly so that good projects can advance, and ones that further burden the county can be reconsidered. Regarding the current standard in table 19, we question "Suburban Transportation Service Area," which allows a Level of Service (LOS) of E, while imposing a LOS of D for Urban Neighborhood, Mixed-Use Neighborhood, and Campus. We suggest swapping these standards; and
- We agree with the housing policies and priorities proposed, especially: implementation and support for a county and/or residents' first right of refusal, increased funding with a dedicated housing trust fund, increased staffing for DHCD, and strengthened nonprofit housing organizations.

While we commend the many strong elements of the Plan, we suggest it still needs critical strengthening to ensure that it can fulfill its goals.

We ask the Board and Council to stem the pipeline of sprawl. To do this we urge the Board and Council to adopt strong measures to phase out the backlog of approved but unbuilt projects, and eliminate the designation of unbuilt "Suburban Town Centers" Westphalia, Konterra, and Brandywine as growth centers.

Fueling large, automobile-dependent residential and commercial developments in these areas will steal scarce public dollars and focus away from where growth belongs – at priority Metro stations and revitalization areas. We don't accept the inevitability of the big sprawl "centers" that have been pushed in the past. We ask you to remove large scale greenfield development plans from the list, and to implement reserve areas where sewer and water is planned but not extended.

The Plan recommends several changes to the development approvals process to try to reduce the nearly 17,000 approved but unbuilt housing units. The vast majority of these approved projects would be in suburban areas far from transit. This sprawl pipeline undermines the Plan's effort to guide investment to Metro stations and revitalize established communities. The Plan offers a number of measures to begin to address this problem – limiting approved plan time extensions, limiting the period for adequate public facilities determinations, requiring performance bonds prior to recordation of final plats, and implementing a residential allocation process to stage new development based on priorities. We need to implement all of these measures and additional tools to stop development in undeveloped areas.

Another important action to stem the pipeline of sprawl is to eliminate the Suburban Town Centers of Westphalia, Konterra and Brandywine, and downsize the other suburban centers. Currently 25% of the county's growth is planned for these areas. This is too much. We ask that these planned sprawl "centers" be deferred and reduced in scale. The county should devote its state and local resources to maintaining established communities and channeling growth to the priority investment areas near transit.

Conclusion

We applaud the progressive vision of this plan and believe it is the right direction for the county. Plan Prince George's 2035 offers a blueprint for realizing the county's potential to build great communities, and strengthen its tax base through transit-oriented development. Implementing this vision requires all the county's decision-makers to commit to strategic, focused public investments in transit centers. It also requires stemming sprawl by eliminating the backlog of unbuilt sprawl projects, designating unbuilt suburban properties to reserve areas, and removing the designation of "Suburban Town Centers" from Westphalia, Konterra and Brandywine.

Thank you for your consideration.

Sincerely,

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Cheryl Cort Policy Director