

November 19, 2003

MEMORANDUM

TO: Montgomery County Planning Board

VIA: John A. Carter, Chief, Community-Based Planning Division
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SUBJECT: Upper Rock Creek Area Master Plan Worksession 10 – Land Use
Pulte Homes Proposal for an Active Adult Community on the Freeman
Property

RECOMMENDATION: Retain the Master Plan's recommendation for the Freeman property

Overview

The Planning Board Draft Upper Rock Creek Area Master Plan recommends the Rural Neighborhood Cluster (RNC) Zone for the Freeman property, and sets appropriate densities of 0.2 dwelling units to the acre under the standard method of development and of 0.33 dwelling units to the acre with community sewer service under the optional method. The Plan also recommends a series of guidelines designed to concentrate cluster development in cleared upland areas, preserve existing forests and other sensitive areas, and maintain compatibility with nearby neighborhoods. The Planning Board Draft map of the property is attached.

At the County Council's October 21 Public Hearing on the Plan, representatives of Pulte Homes proposed to the Council an "active adult community" for the Freeman property, which Pulte has contracted to acquire. Pulte representatives indicated that the community would contain approximately 585 single-family detached houses, of which 520 would be single-family attached or detached houses. The remaining 65 would be moderately priced dwelling units in multi-family buildings. Pulte proposed to provide 234 acres of open space as part of the development, as well as recreation facilities for the residents and a small amount of commercial space for the convenience of residents. The company asserted that its project would have no impact on local schools, because the age restrictions would restrict children from living in it, and that it would have minimal impact on peak period travel, because most residents would not be traveling to jobs. It also proposed to use innovative design and engineering techniques to reduce effective imperviousness on the property to less than 10 percent.

Pulte proposed that the Zoning Ordinance be amended to allow active adult communities as an optional method development in the Rural Neighborhood Cluster Zone. The amendment proposed a maximum density for these communities of 1.8 dwelling units per acre.

The County Council requested that the Planning Board review the proposal, hear public comment, and send a recommendation on it back to the Council for discussion during worksessions on the Plan.

Summary of Public Comment

On November 13, the Planning Board saw a presentation of the proposal from Pulte representatives and heard comments on it from more than a dozen interested residents, many of whom were representing hundreds of their neighbors. Residents were uniformly negative. These residents strongly questioned the need for an active adult community, suggesting instead that increasing numbers of late middle age residents would prefer to remain in their current homes. Many noted that the significant increase in density would have profoundly negative effects on sensitive environmental areas by increasing imperviousness and stormwater runoff. Many also questioned the assertion that late middle age residents would not be traveling to work in significant numbers and suggested that the additional traffic from 585 units would place additional burdens on a road network they believe to be under considerable stress.

Local residents also argued that the proposed development did not meet the main objectives of the Upper Rock Creek Area Master Plan; protection of residential character and preservation of environmental resources. Many indicated that the Planning Board Draft recommendations adequately met these objectives, and recommended that they be retained.

Finally, commenting residents opposed amendments to the Rural Neighborhood Cluster Zone. A number stated that the County's Planned Retirement Community Zone was designed precisely to facilitate developments like Pulte's proposed community. Others raised concerns that the retail development included would attract additional traffic. Still others suggested that expanded commercial areas would result if the proposal is permitted in the zone.

Analysis

Land Use

The Pulte-Del Webb proposal is based on the idea that Montgomery County is home to an increasing number of affluent households whose members are in late middle age, have ended or are winding down their careers and have lessening family responsibilities. These households, the company posits, are leaving Montgomery County—with an accompanying loss of tax revenues—because they are seeking “age targeted” or “age restricted” communities that allow them to live comfortably with like-minded people in single-family homes that require much less attention and are located in communities that provide a wide range of recreational amenities. Pulte-Del Webb

asserts that significant numbers of these affluent residents want to move from their present homes to achieve these objectives and proposes to keep them and their tax dollars in Montgomery County by building the active adult community they seek on the Freeman property.

Because residents of Pulte-Del Webb's active adult communities are either retired or control their work hours, the firm asserts that peak hour traffic will be significantly less—just a third to 40 percent—of the trips that would occur in a conventional community of the same size. In addition, the age restrictions would essentially eliminate children from the community, and there would be no impact at all on local schools.

Pulte-Del Webb's assumptions should be evaluated in a systematic fashion. Do affluent late middle age households in Montgomery County consist largely of people moving towards retirement? Do these households want "age restricted" communities? One way to evaluate these assumptions is to review relevant data from the 2000 U.S. Census. Data for Montgomery County indicate that 71 percent of residents between the ages of 55 and 64 remained in the labor force in 2000. For residents 55 to 59 years of age, 78 percent remained in the labor force. For men, the figure was 85 percent; for women, 69 percent. With almost seven in 10 women between the ages of 55 and 59 still in the labor force, it seems reasonable to think that married-couple households in this cohort may generally consist of two working adults. While the 2000 Census does not appear to report employment status of family members by age cohort, the Census does report that almost six in 10 married-couple families in 1999 included a working husband and wife.

This strongly suggests that late middle age County residents are not moving towards retirement. One reason for this may be the quality of jobs in the Washington metropolitan area. For the employed civilian population over the age of 16, 92 percent were engaged in management or professional occupations. Such jobs are both remunerative and challenging enough to hold the ongoing interest of workers in late middle age.

There is also some evidence that these households may not be interested in "age restricted" communities. A 1999 survey published in the industry journal Realty Times found that fewer than 3 percent of Baby Boomer respondents indicated that they would choose to live in an age-restricted community. A 2002 national survey conducted by the National Association of Home Builders found that more than half of respondents preferred communities that housed multiple generations. One of the builders responding to these trends is Pulte-Del Webb. In 2001, the company reported that it was developing a community in Nevada that would be only a third age-restricted. Pulte-Del Webb executives have acknowledged that today's late middle age householders are seeking communities that included a wide range of ages.

Even if there was a demonstrated need for this type of housing, is the Freeman property an appropriate location? Pulte-Del Webb is proposing to locate 585 units on the property, more than a fivefold increase in density over that recommended in the

Planning Board Draft. This density is not in harmony with the objective of maintaining low-density residential character in Upper Rock Creek. Prevailing densities in the Master Plan area are less—considerably less—than one unit per acre.

In addition, the “neighborhoods” shown by Pulte-Del Webb are substantially larger than those in existing Rural Neighborhood Cluster communities such as Ashton Preserve in Sandy Spring, which show smaller groups of houses around a central open space, like a green. The Master Plan does not contemplate commercial or retail uses, even at the small scale proposed here. Non-residential uses allowed in the RNC Zone are related to agriculture.

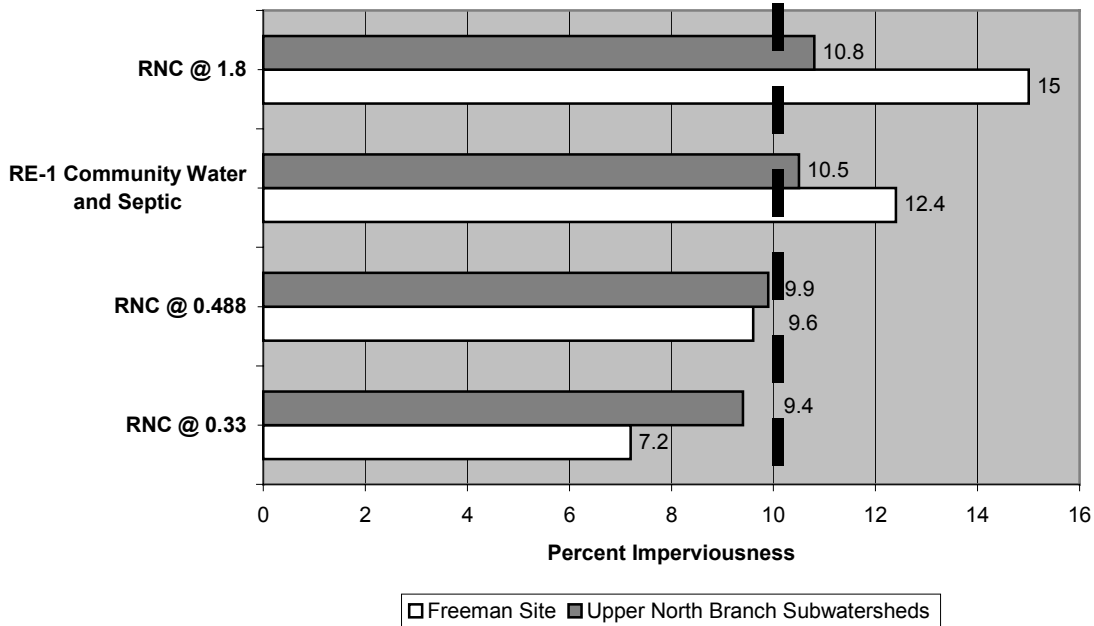
In addition, a key element of the Rural Neighborhood Cluster concept is its wide range of lot sizes, which were designed to echo the mixed pattern of farms and small communities found in rural areas. The Pulte-Del Webb plan shows 525 lots that range in size from about 5,000 to about 8,000 square feet; the remaining moderately priced dwelling units are placed in a multi-family setting. There are no conservation lots; there are no lots at or above the 15,000 square foot minimum set out as a guideline in the Plan. The Pulte-Del Webb plan does provide open space in accordance with the standards of the zone; it does so at the expense of other, equally important design standards also present in the Zoning Ordinance.

Environment

Pulte-Del Webb is proposing a development that would increase imperviousness on the site substantially and include enhanced stormwater management and tree planting as offsetting environmental benefits. While these measures may add some benefits to the ecology of the area, staff feels that these benefits could be achieved through other means and do not sufficiently offset the potential impact of additional imperviousness.

The Freeman property lies within the headwaters of the North Branch of Rock Creek. Most other branches of the headwater streams are already affected by higher density development in the Olney town center and the TDR receiving areas of Oatlands and Norbeck Grove to the east. The western branches are mostly developed with low-density large-lot residences. Smaller parcels of vacant land lie immediately north and west of the property. A comparison of the imperviousness projected for the site and for buildout of the Freeman and other parcels in the subwatersheds of the North Branch headwaters is shown below.

Projected Imperviousness of Freeman Property and Upper North Branch Subwatersheds



The projections indicate that, at 15 percent imperviousness¹, the proposal will drive the headwaters subwatersheds above 10 percent imperviousness. Even if you assume the rationale behind “effective” imperviousness at 9.4 percent, this is much higher than the 7.2 percent estimate for RNC at 0.33 and similar to the level of RNC at 0.488, which brings the subwatersheds very close to 10 percent imperviousness and leaves no room for discretion at the time of site plan for additional features that might be desired by the Board or the developer. There is no substitute for maintaining low imperviousness to sustain water quality in sensitive streams. Once the watershed is degraded due to high amounts of imperviousness it would be almost impossible to restore the existing water quality. While some research indicates that subwatersheds that have substantial stormwater management facilities can have similar qualities to subwatersheds with slightly lower imperviousness², this result is highly variable, and does not guarantee that will happen. Keeping the density at 0.33 units per acre gives a sufficient buffer to assure that the subwatersheds remain below 10 percent imperviousness.

¹ Staff has spot-checked the estimates for total imperviousness provided by the Freeman/Pulte group and found them to be generally sound and similar to those of recent development proposals on similar lot sizes.

² *Stream Condition Cumulative Impact Models for the Potomac Subregion*, ERM, Inc., prepared for the Maryland-National Capital Park and Planning Commission, March 2000.

Relative Comparison of Stormwater and Resource Options for Freeman

	RE-1 with Water and Septic Systems	RNC @ 0.33	RNC @ 1.8
Stormwater Management	Disconnected imperviousness encouraged and given credit	Disconnected imperviousness encouraged and given credit	Disconnected imperviousness difficult to accomplish
Overflow from Disconnected Imperviousness	Discharged over ground	Discharged over ground or conveyed to SWM facility	Used for irrigation or conveyed to SWM facility
Pretreatment of Stormwater from Roads	Accomplished through grass swales along open section roads	Accomplished through grass swales along open section roads	Separate facilities required to offset mandatory closed section roads
Roads	Open Section	Open Section	Closed Section required due to narrow lot frontage
Reforestation and Wetland Restoration	Accomplished by banking and natural revegetation	Accomplished by banking and natural revegetation	Proffered by developer
Mass Grading	Most grading limited to home sites and roads	Most grading limited to home sites and roads	Mass grading likely

The proposal before the Planning Board includes environmental enhancements intended to offset the dramatically increased imperviousness. The first enhancement is an approach to stormwater management that purports to reduce the impact of imperviousness by infiltrating rooftop runoff and incorporating intermediate facilities for site runoff as pre-treatment prior to accumulating in more conventional retention facility.

While this approach is laudable, similar approaches would likely be undertaken with any development, since the Master Plan recommends that all new development incorporate low impact development techniques. The Montgomery County Department of Permitting Services (DPS) encourages similar approaches in Use III watersheds as ways to minimize thermal impacts and increase the potential for infiltration. The Maryland Stormwater Management manual, recently adopted by Montgomery County, gives credit toward downsizing retention facilities if rooftop drainage is “disconnected” via drywells, rain gardens, or other methods. There is no means to assure that all of the techniques would be incorporated and conventional facilities would not be downsized. In addition, the potential for infiltration on this site may be affected by soils that may have limited permeability. This new concept of enhancing stormwater management is not fully detailed and has not been reviewed by the Department of Permitting Services.

No records are available of its success in reducing the flow as well as pollutant loads. To a considerable degree, success will depend on the design, construction practices and maintenance of the systems. In staff's opinion, these techniques cannot be considered as a sufficient substitute for low imperviousness.

Infiltration facilities in Montgomery County must have a safe means for conveying stormwater overflow for runoff that exceeds the capacity of the facility, or in situations where permeability is questionable. On very large lots, this can be accomplished over the ground as sheet flow. Smaller lots will require conveyance of the overflow to other stormwater management facilities, minimizing infiltration.

In addition, there will be a clear difference between the Master Plan recommendation and the Pulte proposal. The lot sizes proposed by the more dense development may not allow the use of dry wells or other infiltration mechanisms. Also, they will require the use of closed section roads, which are normally not allowed in Use III watersheds. DPS will require offsetting water quality improvements (similar to those now proposed as enhancements) to accommodate the greater pavement width and lack of pretreatment provided by the grass swales normally associated with open section roads. Stormwater enhancements proposed by the developer would not be a significant increase over that provided by other developments of a similar nature in a sensitive watershed.

Dense development encourages mass grading. Grading in environmentally sensitive watersheds should be limited to what is needed for house construction. Developments should use natural topography as much as possible for both roadways and for individual lots. Mass grading removes topsoil, compacts the subsoil that remains, and removes natural vegetation. All of this decreases the ability of the land to naturally infiltrate rainfall. Soils become less fertile with little moisture holding capacity or natural fertility. This means more use of fertilizers and irrigation.

The second part of the Pulte proposal is a forest and wetland restoration concept that is similar to that already recommended by the Master Plan. While it may be done sooner or more comprehensively through this development plan, mechanisms exist for forest banking, wetlands restoration and natural regeneration that could accomplish the same result.

Transportation

Transportation analysis of the Pulte-Del Webb proposal focuses on trip generation rates likely to occur in retirement communities. The youngest residents of these communities are likely to be between 55 and 59, with significant proportions aged 60 and above. The Transportation Planning unit agrees that such communities generate significantly fewer trips than conventional neighborhoods, based largely on relatively low labor force participation rates for the entire population aged 55 and greater. The unit also concurs that trip generation rates from similar communities in other areas can provide an accurate picture of peak period travel for purposes of comparison. Pulte reviewed peak period travel rates for two active adult communities in Northern California and concluded that peak period travel ranged from 34 percent to 39 percent of conventional

residential developments. The Transportation Planning unit averaged those two rates and calculated a single rate of 0.365 trips per dwelling unit.

Using those rates, the transportation analysis concluded that a maximum of 214 peak period trips per day could result from the proposed adult community. The Plan's recommended 110 units would generate 111 peak hour trips. The maximum number of trips generated by the development is fewer than those that would occur in a conventional residential community, but more vehicle trips per unit than would occur in a traditional retirement community.

The memorandum detailing the analysis and methodology is attached.

Conclusion

Pulte-Del Webb believes that there is a rapidly developing need for an active adult community in Montgomery County. Review of recent Census data suggests that the need for such communities is less evident than the company asserts. In any event, the proposal represents a significant break with the objectives set out in the Planning Board Draft Upper Rock Creek Area Master Plan. It would significantly increase densities in an area now known for its low-density residential character. While the innovative nature of some of the proposed environmental engineering techniques is laudable, many of their benefits can be accomplished through other methods, and those benefits do not offset the impact of the significant increases in imperviousness that will accompany a project of this size. Finally, a proposed development of this type will generate significantly more traffic than the smaller community recommended in the Master Plan. For these reasons, the staff strongly recommends that the Master Plan recommendation for the Freeman property be retained.

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Attachments