

MONTGOMERY COUNTY IN THE 21ST CENTURY
Creating a Unique Sense of Place in Montgomery County

*Revitalizing Centers, Reshaping Boulevards,
Creating Great Public Spaces*

WORKING PAPER

Maryland-National Capital Park and Planning Commission
Department of Park and Planning
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LOOKING AHEAD *THE NEXT 25 YEARS*

- **In the next 25 years...** growth will continue but at a slower pace. Even so, Montgomery County is forecast to add 170,000 new jobs and almost 80,000 new housing units.
- **In the next 25 years...** the I-270 Corridor will see the majority of new jobs, led by Rockville and followed by Germantown, North Bethesda, Clarksburg, and Gaithersburg.
- **In the next 25 years...** the northern half of the I-270 Corridor from (Gaithersburg through Clarksburg) will see the largest number of new housing units, but the more urban areas of North Bethesda, Bethesda, Silver Spring, and Wheaton will also see substantial housing growth.
- **In the next 25 years...** the County will become more urban in character than in the past. Sixty percent of future housing units will be apartments and condominiums, double the percentage today. Offices, stores, and other employers will continue to flock to Metro station areas, including the downtowns of Bethesda, Friendship Heights, Rockville, Silver Spring, and Wheaton, as well as the urban areas above the Twinbrook and White Flint stations.

There will be many more opportunities for commercial development than for new housing. Current plans allow only about 20-25 years of additional housing development, but there are at least double that for non-residential development.

Perched at the edge of Washington, D.C., Montgomery County will continue to grow. Equally important, some growth is necessary as a crucial component of economic and social well-being. In addition, the County desperately needs additional housing opportunities to provide its workforce with a place to live.

The great issue facing Montgomery County today is: How will the County manage this future growth? With the strong commitment to preserving the integrity of the Agricultural Reserve, expanding the development envelope into precious agricultural and rural open spaces is not an option. If Montgomery County is to accommodate the expected growth, the County will look for exciting, new opportunities within already-developed areas.

TABLE OF CONTENTS

EXECUTIVE SUMMARY

I.	INTRODUCTION	3
II.	PLANNING FACTS	4
III.	TRANSITION TO A MATURE COUNTY	
	A. Then and Now	8
	B. Charting a New Direction	9
	C. Redevelopment Opportunities	10
IV.	PLANNING FRAMEWORK	
	A. Strategic Land-Use Linkages	10
	B. Planning Process in the Future	12
V.	LIVABILITY GOALS	13
VI.	GOING PLACES--A DEPARTMENTWIDE WORK PROGRAM....	15

Technical Appendix:

- #1: Montgomery County, A Maturing County
- #2: Addressing the Jobs/Housing Imbalance
- #3: Brochure: Residential Capacity, Current Plan Allows 75,000 More Housing Units
- #4: Planning aspects of the County's Strategic Economic Development Goals
- #5: Work Program

In February 2005, more than 300 regional leaders from 22 jurisdictions convened in a visioning exercise, Reality Check, to take stock of the pace and growth confronting the Washington region.

Reality Check began a dialogue about our region's future and set the framework for implementation work to continue at the local level. The Department will take many of the principles formed in Reality Check and evaluate how they align with the Centers, Boulevards, and Public Spaces Program.

EXECUTIVE SUMMARY

The Department of Park and Planning proposes to a) pursue a strategy to reshape the plan-making process to focus on small area planning; b) focus opportunities for redevelopment and continued economic growth within existing centers; c) reshape frontages of some major transportation routes into boulevards that become community assets; and d) create vibrant public spaces that contribute to livability within our communities. This effort will be accomplished while protecting and supporting the County's Agricultural Reserve. These efforts will help to reduce pressure to expand the development envelope into valuable rural land.

The proposed strategy provides:

- ***A vision for future planning that sustains growth without compromising the natural resources on which future generations depend.***
- ***A planning framework to guide future land use in a maturing County consistent with the spirit of the General Plan and intent of Smart Growth objectives.***
- ***An implementation approach that seeks to focus opportunities to capture community benefit within the development envelope and around public spaces.***

A redevelopment strategy will help to: a) make jobs, housing, and public spaces more accessible to the population most in need of them, b) conserve land and watershed resources, c) consume less natural resources, d) reduce commuting distances, e) promote higher levels of design, and f) spare the public and private sectors the cost of adding roads, sewers, and other infrastructure.

A more focused planning process aimed at directing growth inward, and to some extent, upward, is essential to maintaining vital communities, providing continued economic growth, and supporting the overall well-being of Montgomery County.

I. INTRODUCTION

Montgomery County's long-term commitment to principled land use planning and growth management has been key to attracting and retaining residents, businesses, and workers. Adherence to the "Wedges and Corridors" concept, set forth in the General Plan, which has been strongly backed by political leadership, has enabled the County to avoid the consequences of unrestrained development, unacceptable losses of parkland and farmland, and fragmented suburbs. The result has been a stable and desirable market environment that offers a broad range of residential and business choice.

Montgomery County must remain committed to sustainable development that balances economic and environmental concerns and serves the needs of a changing population. Montgomery County has within its reach the tools and opportunities to vitalize its centers, improve the form and function of its major transportation routes, and sustain its unique open-space character.

Community-scaled redevelopment and infill development associated with multi-modal transportation initiatives will provide a new dimension for innovative and imaginative planning that will support Smart Growth objectives and use less of the earth's nonrenewable resources, while creating livable and inspiring places to live and work for future generations

As Montgomery County matures, the planning focus will continue to evolve. The outward expansion of infrastructure is no longer a priority. In fact, the County's fiscal capacity for acquiring land and expanding infrastructure is limited. Instead, Montgomery County is focused on reinvestment and redevelopment to improve and maintain its existing residential and business communities.

As the economic energy of the County continues to grow, however, the supply of developable land continues to diminish, the need for more affordable workforce housing intensifies, some neighborhood commercial centers languish, and some major travel routes have become areas of disinvestments and neglect. At the same time, a body of government regulations oriented toward limiting the negative impacts of suburban expansion constrains development in many areas already identified for growth.

Within just one generation, Montgomery County's character has changed dramatically from a suburban bedroom community to that of a more urban employment center. A general anxiety exists about the impact of new development on existing residential and business communities, as well as the increasing pressure to intensify development in the Agricultural Reserve. Concerns have emerged about new development and sprawl and its impact on traffic, aesthetics, school capacity, the environment, and economic vitality.

In response to these contemporary economic, land use, environmental and community issues, the Department of Park and Planning recommends a strategy that will best capture the County's future development potential through a *more focused* pattern of sustainable growth.

The Department of Park and Planning proposes to a) pursue a strategy to reshape the plan-making process to focus on small area planning; b) focus opportunities for redevelopment and continued economic growth within existing centers; c) reshape frontages of some major transportation routes into boulevards that become community assets; and d) create vibrant public spaces that contribute to livability within our communities. This effort will be accomplished while protecting and supporting the County's Agricultural Reserve. These efforts will help to reduce pressure to expand the development envelope into valuable rural land.

The proposed strategy is aligned with adopted County land use policies and is in conformance with the "Wedges and Corridors" concept set forth in the General Plan. In addition, the County Council's "Strategic Plan for Our Community's Quality of Life and Economic Development" and the policy guidance expressed in the Planning Board's "Transportation Policy Report" recognize the development, economic, and community benefits of a strategic redevelopment approach.

II. PLANNING FACTS

Fact #1: Montgomery County has a heritage of "Looking Ahead".

In the 1960's, when Montgomery County citizens and leaders looked into the future, they worried about sprawl, environmental degradation, and economic inequality.

Acting together, they produced a General Plan that is both a planning landmark and a source of inspiration for localities throughout the country. That plan, "On Wedges and Corridors" embraced the then radical notions that growth should be contained within areas well-served by public facilities, that persons of every background and income should have a place in the County to live and work, that every generation must act as the steward of the County's natural resources for the next generation, and that the County's farming heritage should be preserved with economically viable agriculture.

Equally impressive, the County enacted groundbreaking regulations to make sure the "Wedges and Corridors" vision would be achieved. Families with below-average incomes are welcomed to wealthy Montgomery County with affordable housing required by "moderately-priced dwelling unit" legislation. Farms and rural open space are being preserved through a still-innovative transfer of development rights process in the Agricultural Reserve. The County's Adequate

Public Facilities Ordinance requires that new development is served by adequate transportation, school, and other services.

Fact #2: Montgomery County is still committed to the principles of the General Plan.

These principles provide the framework to channel new development to growth areas; safeguard the quality of life in established neighborhoods; preserve the Agricultural Reserve; and plan, acquire, and develop public spaces to provide passive and active recreation opportunities.

Fact #3: Within two generations, the County's character has changed dramatically.

Since the General Plan was adopted more than 40 years ago, Montgomery County has seen its population double, its number of housing units triple, and its jobs quadruple.

The County is now home to more of Maryland's population and economic activity than any other jurisdiction in the State. It has evolved from a "bedroom community" for Washington, D.C. to become Maryland's "economic engine."

Fact #4: Montgomery County is maturing.

We are approaching build-out, our rate of growth is slowing, and the population is aging along with infrastructure and buildings.

Fact #5: Greenfield development is over.

The County has much less overall development potential. Development potential throughout each planning area is more limited. Development potential is now more focused within the development envelope.

Fact #6: Outward expansion of infrastructure is no longer a priority.

The County must heighten its commitment to reinvestment and redevelopment opportunities within the development envelope. The County does not want to develop the Agricultural Reserve nor does it envision redeveloping established residential neighborhoods.

Fact #7: Growth pressure will continue.

Our location near the core of a thriving metropolis means that we will continue to grow. Although the County's growth rate is slowing, we will see 170,000 more jobs and 78,000 more housing units over the next 25 years.

Fact #8: We will have a more urban future.

Development in the future will be more urban in character; 60 percent of future residential development will be apartments and condominiums.

Fact #9: Recycling existing commercial centers and some transportation routes makes good sense fiscally, environmentally, and socially.

Centers and boulevards are “renewable resources” that offer ways to unite jobs and services with neighborhoods in a way that promotes greater livability by fostering walking, transit use, and connectivity of public spaces.

Fact #10: The market is ready to redevelop the County’s centers and boulevards.

Owners of commercial centers are already coming forward with redevelopment plans. The market supports their planning; at least 143 acres or 24 percent of the County’s existing commercial centers are ripe for redevelopment. Redevelopment is likely when the land has become more valuable than the development that sits on it.

Centers and boulevards are where the action is and will be. Centers and boulevards are where redevelopment potential already is, even if we do nothing, redevelopment will occur.

Fact #11: Large amounts of redevelopment can happen now.

The County’s 1,550 acres of commercially-zoned land can be redeveloped to more than 29 million square feet of commercial space, or 80,000 more jobs. The development potential of the parking lots alone is 5.5 million square feet.

If housing were a permitted use on the commercial center sites, at 6 units to the acre, there is a potential for more than 9,200 additional housing units (of which 1,200 could be moderately priced). At 15 units to the acre, there is potential for more than 23,000 units, of which more than 3,000 could be moderately priced.

Current plans encourage redevelopment to be mostly commercial in nature, and mixed use is not encouraged. Current zoning, especially of the centers, allows a wide range of commercial development while not encouraging livability or walkability. Amenity requirements are low.

Fact #12: Some major transportation routes can be reshaped into boulevards, that also present opportunities for improved functioning and careful redevelopment.

These areas require thoughtful planning and intergovernmental coordination to address redevelopment, provide multi-modal transportation access, and contain sprawl. If properly designed, they could be great assets to the County and convenient and safe places to walk, bike and use transit.

Fact #13: The County needs more affordable housing. Centers and along some major transportation routes are the right place to put it.

Home prices are increasing much faster than wages in Montgomery County. We need more housing choices that are affordable to a wider range of families.

The County has only enough land available for new housing to last about 25 years.

The need for housing is everywhere that there are jobs- the existing commercial centers are job rich and housing poor. We need a variety of housing, everywhere that we can wisely put it. Opportunities for adding housing outside of commercial center areas and along transportation routes are few.

Multi-family housing is a symbiotic component of redevelopment- it fosters 24-hour vitality, supports amenities, shares parking with commercial activity, and takes advantage of transportation availability. Multi-family units, built at densities sensitive to surrounding areas, are appropriate for redeveloped centers and along some transportation routes.

Fact #14: As land for development becomes scarce, land for public space does too.

There is an ever-increasing public demand for public spaces in more intensively developed areas. We need a planning process that focuses on small area planning to better assure that every piece of public space functions well and serves the unique needs of our residential and business communities and enhances overall quality of life.

Fact #15: The current master plan approach is geared toward the expansion of the development envelope.

The current master plan approach was developed when there was lots of development potential throughout each planning area. The approach is not necessarily well suited for the next 25 years of planning.

The current master plan approach is designed to look comprehensively at issues usually appropriate for the planning of large amounts of land. The current master plan approach is lengthy, and with long periods of time between updates.

The master plan approach is being reshaped so that attention and resources will be focused on the development and redevelopment opportunities within the development envelope, managing the quality of life in areas not planned for additional growth, and on maintaining the vitality of the Agricultural Reserve.

III. TRANSITIONING TO A MATURE COUNTY

A. Then and Now

In the past 40 years, Montgomery County saw its population double, its number of housing units triple, and its jobs quadruple. Within two generations, Montgomery County's character has changed dramatically from a bedroom community with a few major employment centers to a major employment, commercial, and population center in its own right, home to the more of Maryland's population and economic activity than any other jurisdiction in the State.

What the forward-thinking County leaders planned in the General Plan is coming true:

- Growth has been largely contained within urban areas and the I-270 Corridor, while much of the agricultural "wedge" remains undeveloped as part of the Agricultural Reserve.
- Montgomery County's economy is one of the healthiest in the country and is the economic engine of the state of Maryland.
- Our investment underground in Metro is paying off above ground by attracting the smartest of "Smart Growth" housing, jobs, services, and public spaces in a well-designed urban setting.
- Many of our natural and historic resources are now protected for future generations. More than one-third of the County is protected through public ownership or zoning and other development controls.
- Tens of thousands of affordable housing units have been created. These are dispersed throughout the County and provide an array of housing choices that comparable counties can't match.
- A broad diversity of residents from around the world is coming to Montgomery County to work, raise families, and create communities.

These successes have not diminished the challenges to the vision of the General Plan; they have intensified them. Demand for land in Montgomery County continues unabated. People want to move here and employers want to locate their businesses here. But land planned for additional development is growing scarcer. Pressure to "break the wedge" and allow growth to spill into our Agricultural Reserve, will only increase.

B. Charting a New Direction

There are many signals that Montgomery County is maturing.

The County is approaching build-out, its rate of growth is slowing, and its population is aging along with its infrastructure and buildings. However, the County will continue to experience major demographic and economic changes. **(Attachment #1: Montgomery County, A Maturing County)**

As a result, the County's planning focus will turn from managing outward expansion and the overall pace of growth toward maintaining and enriching the quality of life within the development envelope. While at all stages, there is a great deal of interest in the quality and suitability of proposed development projects, in a maturing county, the importance of each remaining developable or redevelopable parcel is magnified.

It is important to emphasize the "people" aspect of growth and change in the future. As Montgomery County grows, we must make sure future plans reflect the community vision, needs, and aspirations.

While in the past the focus has been on managing the transition from rural to suburban, planning in the future will be on making a careful transition from auto-oriented suburban areas to pedestrian-oriented, transit friendly urban areas.

"Post-suburban" issues facing the maturing suburb include:

- What does it mean for a suburb to become more "urban?"
- How can the maturing process be managed to maintain economic vitality and quality of life?
- In what ways are suburbs vulnerable to decline and how can this be avoided or reversed?
- How do we confront continued growth pressures on rural areas?

Some common themes in "post-suburban" discussions include an emphasis on creating places that are a delight to experience, the critical role of continued reinvestment, and the many benefits of delivering services that people want in places where they can easily access them.

In a maturing county, a greater proportion of future growth and change will occur as redevelopment or infill development.

C. Redevelopment Opportunities

A greater proportion of future growth and change in the County will occur as *redevelopment*, the reconstruction or replacement of buildings on developed parcels; or *infill development*, the construction of new buildings among existing

buildings, either on vacant parcels or on the un-built portion of already-developed parcels.

Directing growth inward and, to some extent, upward, is essential to maintaining vital communities and reducing sprawl pressure. Every community benefits from regular reinvestment, whether it occurs privately and incrementally, or as part of a major redevelopment effort with public and private entities in partnership.

The typical redevelopment opportunity is an under-performing property. "Under-performing" in this case may not necessarily mean "unsuccessful." It may mean that while the current use has some value, there are other uses that would provide even greater value. Synergy occurs when redevelopment opportunities can provide increased value both for the landowner and the neighboring community.

Redevelopment opportunities may involve obsolete land uses or obsolete building types. A drive-in movie theater is a good example of a land use that became obsolete; more recently, mobile home parks have become part of Montgomery County's past. "Obsolete" is in the eye of the beholder, but can include:

- Older grocery stores and drug stores that are too small to be used for today's larger supermarkets and drug stores. Sometimes these stores can be adapted for different retail uses but often redevelopment is necessary to provide the types of space required by the current tenant mix.
- Older office buildings with smaller floorplates that are no longer as marketable as larger sizes. These buildings also require substantial retrofitting to accommodate the latest technologies.
- Residential development surrounding older commercial centers and strung out along the frontages of the high-traffic roadways that connect centers. Often a series of identical, relatively small homes, such as those built immediately after World War II, are less competitive in the housing market because of their small size and proximity to traffic and noise.
- Land uses or buildings that are not obsolete, but are less intensive than what is planned and what the market will support.

IV. PLANNING FRAMEWORK

A. Strategic Land-Use Linkages

Montgomery County's future will be built on trends begun decades ago. The historic framework of the County's development pattern remains the best guide

for development in the future. Montgomery County has the most to gain by building on proven strengths--the land use characteristics that make the County unique.

Centers, major travel routes, and open space are three elements that have historically defined the County's pattern of development. All planning, in the past and into the future, relates to their form and function.

Early travel and development, moving northward from Washington, DC., was shaped by Montgomery County's topography and stream valleys. Travel, trade, and development followed wide north-south paths along Colesville Road, Georgia Avenue, Connecticut Avenue, Rockville Pike, Frederick Road, and River Road; and east-west paths along Norbeck Road, Western Avenue, East-West Highway, Randolph Road, Montrose Road, and University Boulevard.

These travel routes created a web of intersecting crossroads that spawned vibrant centers of activity. These early centers provided services to the evolving rural, then suburban, communities.

A center was defined most often by a post office, church, schoolhouse, mill, or a general store. Then the center evolved to include a grocery store, drug store, gasoline station, sometimes a neighborhood theater, and residential development along many road frontages near trolleys and railroads. As time passed and lifestyles continued to change, a broader spectrum of services was provided by centers. Centers evolved to include restaurants, dry cleaners, child-care, and entertainment.

By the late 1960's, a pattern of concentrated centers, linked by transportation routes, and separated by open spaces was firmly established and articulated in the General Plan, "On Wedges and Corridors."

The centers, major transportation routes, and open spaces have become the focal points that define Montgomery County; they are the places that create and sustain a sense of community for County residents and workers.

Montgomery County's existing commercial centers can be reinvented to support the growth of a lively mix of uses. Aging frontage along some major transportation routes can be reshaped to capture new economic and community benefit. Open spaces can be creatively used to define the character and livability within these newly reinvented and reshaped communities.

The most practical and cost-effective locations for future growth are in areas where infrastructure is in place in existing centers and along existing major travel routes. When existing centers and transportation routes accommodate additional development, the diffusion of development across the County's supply of open land becomes less likely.

Strong centers are essential to the continuing vitality of the County and the livability of our neighborhoods. Reinvestment and redevelopment is to be encouraged to reverse obsolescence and deterioration of many existing centers. If nurtured by necessary infrastructure and quality design, many centers can support mixed-use, neighborhood commercial and residential re-growth.

Redevelopment of these existing centers must do more than add density. Instead, redevelopment should add housing and provide features, services and facilities that residents want and need. These can include: neighborhood-serving retail, medical offices, public services like libraries, post offices, and government offices; and public spaces. Planning for these centers should broaden the classic “jobs-housing” balance” to a “jobs-housing-amenities” balance.

Major transportation routes between centers present opportunities for improved functioning and careful redevelopment, particularly residential and some mixed use, in selected areas where infrastructure is in place. These areas require thoughtful planning and intergovernmental coordination to address redevelopment, multi-modal transportation access, and contain sprawl. Transportation improvements are market signals that encourage private development in desired centers. Multi-modal transportation investments should be implemented into desired areas while at the same time improving the walkability of these areas.

The County's *open spaces* give character and contrast to developed areas, create linkages, protect sensitive environmental and cultural areas, and provides recreation. These important open spaces are the result of strong public support and numerous public and private actions taken over the years. Coordinated efforts by all County agencies, municipalities, and the private sector will be needed to safeguard and enhance Montgomery County open space resources in the future.

B. Planning Process in the Future

Montgomery County's future is at the crossroads. Many of the County's existing commercial centers, often at the intersection of major transportation routes, are now ripe for redevelopment.

As noted previously, many of these centers have enormous redevelopment potential. In the 810 acres of land in existing commercial centers zoned C-1 and C-2, current zoning allows almost 15 million square feet of commercial development (about 40,000 jobs). But will such significant increase of commercial development serve the best interest of the County?

In the past, the County planned each area sequentially, one area at a time, creating master plans intended to last 20 years or more. They took a detailed look at very large areas as well as stable neighborhoods that are not going to change.

The classic master plan approach is not necessarily suited for the next 25 years. Much of the County is already developed and does not need to be intensively planned. Instead, attention now can be focused on the limited development and redevelopment opportunities throughout the County, on maintaining the quality of life in areas that are not planned for growth, and on maintaining the vitality and integrity of our Agricultural Reserve.

Alignment of Department and County resources, policies, and programs will be needed to meet the complex challenges of place making in established communities.

A planning process, focused on smaller planning areas, can help assure the community and market feasibility of redevelopment opportunities. Attention to more geographically specific areas will permit greater opportunities for discussion and exploration of current community and market realities, redevelopment goals, the feasibility of a variety of land use options, and perhaps most importantly on enhancing the livability and overall quality of life in existing communities..

Furthermore, these efforts will help the County to address the current jobs/housing imbalance in the County's major sub-areas. **(See Attachment #2: Addressing the Jobs/Housing Imbalance)**

A balance of jobs--housing is intended to meet two goals: to provide an adequate number of employment opportunities for County residents, and 2) to minimize the distance a worker has to travel to his or her job.

Balancing jobs and housing by small area can have other benefits. A mix of uses in an area creates vitality throughout the day and weekend. Having housing nearby provides additional customers for retail businesses that could not survive on the patronage of 9 to 5 workers alone.

A balanced mix of jobs and housing can also have fiscal benefits for the County, as it diversifies both revenues and expenditures because different land uses are subject to different market conditions and make different demands on public services and infrastructure.

V. LIVABILITY GOALS

Change and growth is not only about square feet, it is also about important qualitative details that affect quality of life, such as vibrant public spaces, the

provision of desired community amenities, and the availability of transportation options. The “people” aspect of growth and change is critical to planning in the future to make sure that Montgomery remains a place where people want to live, work, and play.

Working toward a set of overarching goals will be helpful in providing a framework for more smaller area planning that sparks reinvestment, redevelopment, and livability within the County’s residential and business communities.

- Development will be channeled, whenever possible, to existing, aging centers where infrastructure can support growth, public transportation can be provided efficiently, neighborhoods can be strengthened, and redevelopment can enhance economic vitality.
- The planning process will be reshaped recognizing the “people” aspect of growth and change for the County--the visions, aspirations and needs of the community.
- Planning will focus on enhancing the appropriate functions of some major transportation routes, by reshaping already developed areas into efficient and attractive multi-use places and by making road and transit improvements that will control roadway congestion and ease vehicular and pedestrian movement.
- Transportation planning and roadway design will focus on creating shared-use boulevards that could become places of great asset to the community.
- A range of housing types will be encouraged that are affordable to renters and homebuyers.
- The use of parks will be further enhanced by improving public access and by taking into account the need for recreation close to population centers and the interests of the County’s changing population.
- Reinvestment will be nurtured with the use of County resources and public/private partnerships to improve infrastructure, housing, and other programs that attract and support business enterprise and neighborhood livability.
- Renewed attention to the delivery of high-quality design of higher- density neighborhoods will preserve and enhance the distinct character of centers, reinforce residents’ sense of place, improve livability, and enhance compatibility with surrounding communities.

- New urban environmental regulations and development standards will be created to encourage the redevelopment potential of these areas. Incentives for the construction of "green buildings" will be developed, as well.
- New planning and development approaches will be designed to provide flexibility and incentives to achieve redevelopment goals. Community vision and redevelopment goals will be assured by heightened oversight.
- The Agricultural Reserve will continue to be protected. Initiatives will be developed to enhance the economic viability of the County's agricultural economy.

V. GOING PLACES--A DEPARTMENTWIDE WORK PROGRAM

The Department is well positioned to support this new planning focus. The Department's key land use, transportation, environmental, park planning, regulatory, and Research Center resources can be quickly redeployed to conduct the research, analysis, and planning needed to develop effective planning approaches to sustain the vitality of existing centers, the functionality of major travel routes, and the viability of agricultural and rural open spaces.

With a willingness to innovate, the Department will work with the political leadership and the many constituencies that, singly or jointly, can move the development principles forward to fruition- civic and business interests, key employers, representatives from educational and banking institutions, and the non-profit community are all valued stakeholders.

Attached is a Work Program that outlines the Department's initiatives to reshape the planning process and channel future growth within the development envelope and away from the Agricultural Reserve. **(Attachment #5)**