

June 23, 2021

Montgomery County Planning Board
2425 Reedie Drive, 14th Flr.
Wheaton, MD 20902

Dear Chair Anderson and Members Fani-Gonzalez, Cichy, Patterson and Verma:

The Citizens' Coordinating Committee on Friendship Heights recognizes the great need for housing of all types, size, and price points in our county. We also understand that this is not a problem unique to Montgomery County; it's a problem all over our country. Neither is it a problem that cropped up in our county in the last year because of the pandemic. Building permit requests have been down since before the 2008 recession.¹

Among the recommendations planners are proposing to meet this increased housing demand is a ZTA based on the Attainable Housing Strategies Initiative (AHSI) that would allow builders to build "attainable housing" "by right" in single-family home neighborhoods. In many of our county neighborhoods, this would include duplexes, triplexes and in some instances quadplexes being allowed "by right" and design would be based on a pattern book, yet to be developed – as if one size will fit all topographies in our county. In addition, using "optional method" zoning within a defined Corridor Focused Growth area², developers could also aggregate up to two lots and build townhouses, stacked flats and cottage houses in what are now single-family zoned neighborhoods.³

The Marketplace: Supply vs. Demand

Based on these recommendations, one would think that the county's single-family home neighborhoods are dying and need resuscitation – like in Detroit or in sections of Baltimore. But, if you do a Google search, there are relatively few⁴ foreclosed or abandoned single-family home properties in our county. It's true some of the single-family home neighborhoods in the county are very expensive, and not everyone can afford to move there. Despite their cost, there are multiple offers on those homes when they come up for sale⁵. Clearly the marketplace of supply and demand is working. And demand, as evidenced by bidding wars, is much greater than supply.

Instead of looking at our single-family home neighborhoods as an asset, the planners see them as a liability. Instead of trying to figure out how to add more housing of all types while still preserving our sought-after single-family home neighborhoods, the planners are nibbling away at them.

Multiplexes or Gentrification?

Attempts to retrofit long-established single-family home neighborhoods in an historically suburban county into a new, more urban design mold takes a lot more forethought than just giving builders "by right" access to those neighborhoods to build multiplexes. A one-size ZTA does not fit all parts of the county and could have a decidedly negative impact on some areas. Due to land and building costs in the wealthier neighborhoods, nothing might change. Builders might decide

¹ <https://montgomeryplanning.org/wp-content/uploads/2021/04/Thrive-Planning-Board-Draft-web.pdf>, Figure 47, p. 9

² [PowerPoint Presentation \(montgomeryplanning.org\)](#), slide 18

³ [PowerPoint Presentation \(montgomeryplanning.org\)](#), slide 17

⁴ [RealtyStore.com: Homes for less. More for you.](#) June 12, 2021

⁵ [Chevy Chase, Md., house sells for \\$1 million over list price - The Washington Post](#)

it's not worthwhile to change their building model and continue to build big new single-family homes to replace old ones. And, in our more attainable, affordable neighborhoods, speculators might offer homeowners a higher price than they could normally get by selling to another homeowner. But those home sellers might be priced out of their neighborhoods because they still won't be able to afford the new rebuilds with their speculator profits, resulting in their displacement from their neighborhood and gentrification.

There's no evidence that consumers are so desperate to move into some single-family home neighborhoods that they would be willing to purchase a multiplex unit at the same purchase price or slightly less than the purchase price of an older single-family home in that same neighborhood. There's no guarantee that a builder will actually *sell* the multiplex units instead of offering them for rent.

The Planning Department has itself acknowledged that very few of these attainable multiplex housing units might be built in our single-family home neighborhoods and the numbers "will not solve Montgomery County's housing crisis."⁶ If only a handful or even just 100 multiplex rebuilds are expected each year, why is so much time, energy and taxpayer dollars being spent on this initiative?

Equity

The Planning Department has said that "the root of the AHS initiative is an effort to make communities more equitable and more inclusive by countering the historical exclusionary aspects of zoning."⁷ If equity is at the root of the Planning Department's attainable housing initiative, then greater consideration of equity in representation should have been made in developing the Housing Equity Advisory Team (HEAT). While it is commendable that the Planning Department developed the HEAT, to reflect a broad range of stakeholders in the county, it is disingenuous to use the word "equity" in its title when this team clearly does not reflect the diversity of our majority minority county. If Montgomery County is truly interested in ending systemic racism in our housing policies, then "equity" needs to begin with more diverse representation on public committees.

Lending Policies

The planners glossed over two issues that have resulted in the most exclusionary aspects of zoning – lending policies and jobs. While there was one person on the Housing Equity Advisory Team who clearly had a financial background, it did not appear that he was a mortgage broker, who could advise as to the feasibility of getting a mortgage for a duplex, triplex or quadplex in a predominantly single-family home neighborhood.

Economic Development Needed

Another part of this financial equation is jobs. We need economic development. If we want to provide attainable housing for all income levels, we need more homes of all types, size, and price ranges, and we also need good jobs that pay well. If we had more high paying jobs like those we already have in the scientific and hospitality fields, then being able to afford housing in our single-family home neighborhoods might not be a stretch, as it is for many families. The planners have acknowledged that in many communities homeowners need to have an average median income for our area of between 96 -125 percent or in some communities, much more than 125 percent.⁸ To get those levels of income, the county needs more jobs. If people are competing for good jobs, wages go up and housing would be more affordable.

⁶ Attainable Housing Strategies – Recommendations, p.16

⁷ Ibid., p.5

⁸ Ibid, p.7.

In fact, it would be interesting to see if a chart of job growth in our county parallels with the bar graph of building permits issued over the years.⁹

Infrastructure

Although the staff acknowledges community concerns about infrastructure, they indicated that “Demands on. . . infrastructure can be addressed through the 2024 Growth and Infrastructure Policy.”¹⁰ How can the Planning Board contemplate an attainable housing policy prior to consideration of the infrastructure needed for it? This is putting the cart before the horse, and this is a recipe for trouble. There is no requirement that multiplex housing have adequate public services and facilities including schools, police and fire protection, water, sanitary sewer, gas and electric lines, public roads, and stormwater drainage. With the larger new builds, many neighboring older homes often have stormwater drainage issues. This could be exacerbated by a multiplex. In addition, many of our older neighborhoods have needed extensive gas line replacement because of our aging infrastructure. All these issues must be considered before allowing multiplexes “by right” in single-family home neighborhoods.

Parking and Public Transit

The staff report indicated “it is important to create policies today that promote the desired future of tomorrow”¹¹ and consequently they’ve reduced on-site parking requirements in areas identified by the Planning Department as Corridor-Focused Growth,¹² resulting in more cars being parked on the streets in our older neighborhoods. Many of the houses in these communities don’t have driveways, garages or only have a single-car garage, requiring cars to be parked on the street. Many of these streets are narrow, only allowing parking on one-side of the street. People with commercial vehicles, who provide homeowner repairs find it hard to park in some of these neighborhoods. It’s also difficult for emergency vehicles – fire trucks and ambulances – to travel through these streets. On-street parking for multiplexes will only make a tight parking environment even tighter.

Before limiting parking in many of our single-family home neighborhoods we need better public transit in place. The lack of public transit throughout our county has created the commuter traffic jams that we all abhor because of the time and energy they waste and the air pollution they create. By not requiring public transit in place before communities were built has led us to the “catch-up” situation we’re in today. The CCCFH realizes providing public transit is a work in progress as the Purple Line continues to be built and bus rapid transit rolls out over the next 5+ years. The BRT and the Purple Line along with the Metro are only a start in making accessible neighborhoods that were previously inaccessible without car ownership. Safe, reliable, and efficient BRT, public bus and Ride-On service, connecting communities along major transit corridors, will certainly help both current and future residents access housing that they may not have considered previously. The key for public transit to really work is for it to be redundant – to have multiple ways for residents to get to jobs, entertainment and recreation, school, and other activities. Our county has a long way to go before we get there and to the planners’ desired future.

Environment

It was disappointing to see Attachment 2 with the possible arrangements of duplex, triplex and quadplex units including the on-site parking on R-60, and R-90 lots. Disappointing because while the planners acknowledge that some off-street, on-site parking is needed for these multiplexes in single-family home neighborhoods, they also took away valuable greenspace for a parking area. That greenspace is what makes our single-family home neighborhoods so desirable.

⁹ <https://montgomeryplanning.org/wp-content/uploads/2021/04/Thrive-Planning-Board-Draft-web.pdf>, Figure 47, p. 9

¹⁰ Attainable Housing Strategies-Recommendations, p. 12

¹¹ Ibid, p.13

¹² [PowerPoint Presentation \(montgomeryplanning.org\)](#), slide 18

Consequently, you're suggesting a tradeoff of greenspace for parking? As it is, when developers teardown an older single-family home and rebuild a much larger home, our neighborhoods lose greenspace and many of our old trees. So, based on these preliminary massing models our neighborhoods get hit with a triple whammy -- more density, less greenspace, and more water runoff.

Why the Rush?

The CCCFH understands that putting together an Attainable Housing Strategies Initiative was the result of a March 2021 request of Council President Tom Hucker and PHED Committee Chair and Council Member Hans Riemer. We agree with County Executive Marc Elrich that this was an expedited process that did not allow input by many residents who will be affected by this sweeping zoning change. A three-month process (March-June 2021) or even a 6-month process on a ZTA that will potentially affect thousands of homeowners when we are just coming out of a pandemic is not enough time to understand and give input into a complicated and extensive policy change.

Having read the Planning Department's recommendations about attainable housing, here are the CCCFH's recommendations:

1. **We need a concrete definition of "attainable housing."** Up until the distribution of this report to the Planning Board, "attainable housing" was defined as "market rate" housing, which has broad implications with respect to consumer affordability. With this report, the term "market-rate" has been dropped and the only definition provided now refers to house scale and density.¹³ If house scale and density are the major issues with providing attainable housing, then why are there so many pages¹⁴ devoted to housing affordability?
2. **Our county residents need more time to review, ask questions and help formulate responses as to how to deal with attainable housing as recommended by AHSI.** We need to make sure that residents in neighborhoods within the Priority Housing District and along Growth Corridors completely understand the impact the AHSI could have on their property and their neighborhood, particularly if the Planning Board or the County Council decides to move forward on this initiative.
3. **Instead of "by right" zoning in a ZTA, attainable housing options should be discussed within master plans.** Single-family homeowners should be able to discuss building multiplex units in their neighborhoods while looking at the broader picture of housing needs in the community. By permitting infill development "by right" the Planning Department is silencing community members who already pay their taxes and live in the single-family home neighborhoods, favoring developers and potential new residents with more input into a neighborhood's design and character than its current residents.
4. **Pilot projects should be considered.** Before passing a broad ZTA that will significantly change single-family home ownership in our county, the Planning Board should consider the suggestion from several members of the HEAT and community members at public hearings, that pilot projects be conducted first to test the proposals. Since multiplex homes are not currently allowed in the county, perhaps a few areas where this would not negatively impact existing single-family home neighborhoods could be pinpointed and a limited ZTA with a sunset clause could be passed to allow for multiplexes in those areas.

¹³ Ibid., p.3

¹⁴ Ibid, pp. 6-8; 14-15

5. **Consider looking at other zones and their properties to build attainable housing.** A few of the HEAT and community members at the public discussions suggested properties where buildings have passed their useful life as well as underutilized expansive parking lots be considered for attainable housing instead of single-family home neighborhoods. Among the suggestions were retrofitting old office buildings and particularly office parks where office space post-pandemic may be much less in demand. Since the White Flint property, which is near Metro, has yet to be developed, stacked flats and even cottage courts -- some of the larger attainable housing units -- could be built closest to the single-family home neighborhoods there.

The CCCFH asks the Planning Board to seriously consider our objections to the Attainable Housing Strategies Initiative. This is a major zoning change proposed by our planners that will affect thousands of homeowners for years to come. We need and want more than the three given to the process so far or even six months if this is extended until December before a recommendation is made to the Council. We need and want more thoughtful ideas as to how to achieve all types of housing in our county without disturbing the beauty and desirability of our single-family home communities. And to do this, we need to make sure *all* stakeholders, particularly current property owners, have input into this process.

Sincerely,

David S. Forman
Chair, CCCFH

The Citizens' Coordinating Committee on Friendship Heights represents the following communities in western Montgomery County:

Brookdale, Chevy Chase Village, Chevy Chase West, Drummond, 4800 Chevy Chase Drive Condominium, Glen Echo Heights, Green Acres, Kenwood, Kenwood Condominium, Kenwood Forest II, Kenwood House Cooperative, Kenwood Place Condominium, Somerset, Somerset House Condominiums, Springfield, Sumner Village, Sumner Citizens Association, Village of Friendship Heights, Westbard Mews, Westmoreland, Westwood Mews, and Wood Acres.

