

TESTIMONY ON SRA 25-02, SUBDIVISION REGULATION AMENDMENT
PRESENTED BY
CHERYL GANNON, PRESIDENT
MONTGOMERY COUNTY CIVIC FEDERATION
SEPTEMBER 15, 2025

Good afternoon, my name is Cheryl Gannon, and I am the President of the Montgomery County Civic Federation. The Civic Federation is a 100-year-old non-profit umbrella organization of neighborhood civic and homeowner associations across the county. We have a strong commitment to a transparent and inclusive planning process that includes resident voices in the future of their own communities. Thank you for holding a hearing today on SRA 25-02 and for the opportunity to testify.

The membership of the Civic Federation has paid careful attention to the development of both ZTA 25-02 and SRA 25-02 and makes requests for five specific areas of this bill.

First, Flag Lots and Through Lots: In considering this bill that accompanies ZTA 25-02, we request that the County Council reject any language that would expand the eligibility of lots for optional method beyond what is currently in ZTA 25-02. This includes rejecting any "loopholes" to allow Planning to create flag lots and/or through lots either by waiver or at the discretion and to reject any proposal to include corner lots that front on a side street. This is all consistent with the stated intention of ZTA 25-02 to upzone corridor fronting lots and avoid expansion into neighborhood interiors.

Second, Lot Coverage: We request that you clarify that housing developed under this proposal will be subject to the same standards for lot coverage as single family homes. This will keep new developments in scale with the surrounding neighborhood and help preserve green space and tree canopy.

Three, Horizontal Consolidation: We cannot support the PHP decision to allow horizontal consolidation of up to 3 lots of any size, to allow for larger developments, including apartment buildings, all done outside of master planning. Lot sizes vary considerably on corridors from the average that Planning uses for illustrative purposes of around 6,000 sq feet to lots of 10,000-20,000 sq. feet each, creating the potential for large developments in some areas that are out of character with the surrounding blocks. In our testimony on ZTA 25-02, we requested specific measures to avoid unintended negative consequences on communities and individual homeowners in storm water management, traffic and parking, green space, loss of naturally occurring affordable housing, and infrastructure concerns, among others. Our suggestions were rejected and now we face lot consolidation that will compound and worsen every potential problem we raised. Without specific measures to protect the communities our members live in, we cannot endorse lot consolidation.

Four, Formula for Workforce Housing Units: We request clarification that the formula for determining how many workforce units will be required will apply to the total number of units built, including townhouses and cottage courts, and not the typology of each structure. Some townhouse projects in the county have a number of buildings with two units in each building, separated by small spaces between the buildings. The structures with two units are technically duplexes but the overall number of units built in the project is much larger than two units. It does not seem consistent with stated purposes to allow a development of townhouse or courtyard cottages, with none of them priced for the workforce because individually each building is a duplex or single structure. These are the typologies that are most likely to be available for purchase and should have a strong workforce housing allocation for each development.

Five, Citizen Advisory Committees and Data Collection: We endorse the proposal of the Citizens Coordinating Committee for Friendship Heights for resident advisory committees that will have meaningful input into corridor developments in their community. Although we remain committed to the master planning process, we endorse this proposal to ensure resident voice in this process that has already bypassed master planning. We add to that a request for collection of data over time to evaluate the effectiveness of this

proposal including number of units built, how many were available for purchase, and the sale and rental prices. Please remember that teachers, fire fighters and police were told they would be getting homes they could afford to buy.

Overarching Concerns

- **We question the need for this continual push for upzoning single family home lots considering the Council of Governments assessment that Montgomery County has enough zoned capacity now without rezoning additional parcels.** Assumptions about transportation and funding, car ownership, and how far commuters will walk from home to a metro station, are often questionable.
- **The proposal ignores the importance of master planning, which allows communities to grow at a scale tailored to unique features.** Regarding corridors, there may well be corridor areas that need and would welcome denser development and some areas where this is too much. The problem here is slapping a one size fits all rule on very different areas of the county.
- **The proposal ignores infrastructure needs** and continues the use of the chronically inaccurate estimates on school space.
- **Data is often inconsistent, old or wrong.** The Planning Board and Council should focus first on doing the basic research and achieve a common consensus between the Council and the Executive branch on—how many people are moving here, at what income level and what type housing will they need and look for? How much zoned capacity do we have already? How do we promote construction of housing where approvals have already been given? How can we use these public tax benefits and expedited processes to foster more construction of housing that can be purchased by our workforce population? Use appropriate data points like median prices as opposed to average prices. Once reliable data is assembled, the policies can be constructed realistically to meet the stated goals, with a focus on those most challenged by housing costs and beginning with areas that provide high yield opportunities for housing. “Build Everything Everywhere” is a slogan and not a responsible housing policy.
- **Decision makers often talk about increasing home ownership and generational wealth for middle income workers, but there is little in the way of concrete policy for doing so beyond the downpayment assistance program.** More than 90% of all the multi-family housing built in downtown Bethesda and Silver Spring in the last 8-10 years has been rental housing. There are no requirements for homes for purchase in this policy and incentives apply to apartment buildings.

Our membership remains deeply concerned about this proposal. We stand ready to work with the Council to promote workable policies to serve those most in need and build stronger communities.