2025 Montgomery County Council Summer Fellowship

Colin Larsen

MCP, Massachusetts Institute of Technology

colray@mit.edu

Image Source: Strathmore View Render, EYA

About the Fellow

Colin Larsen is currently pursuing a Master's in City Planning at Massachusetts Institute of Technology. His interests include zoning and land use, affordable housing, and building dense, vibrant, human-centered communities. He grew up in Montgomery County.

Acknowledgements

Many thanks to the Montgomery County Council for their continued support of the Summer Fellows program, and to Council Central Staff for hosting and supporting me in my research.

Special thanks to Pam Dunn, Logan Anbinder, Naeem Mia and Nicole Rodriguez-Hernandez for supervising, managing and guiding the fellowship. Additional thanks to the following experts who loaned their knowledge to this report: Bilal Ali, Emily Tettelbaum, Colin McNamara, Josh Sloan, and Patricia Harris.

Contents

Executive Summary

Montgomery County typically zones the land within its boundaries via Master and Sector Plans, comprehensive planning documents that focus on a specific region of the county, written over a period of years with significant community input. Through zoning, the County determines the intensity of development and the desired uses for the region in question. These plans are produced in 20-year increments, though more or less time may elapse depending on other factors.

To address changing economic conditions in the interim, the County has also established a mechanism through which individual parcels can be rezoned on a discretionary basis to meet new opportunities or demand for real estate development. These new zones are called floating zones, as they "float" until the rezoning is approved and the new zone lands on the map. These floating zones are intended to be less proscriptive than base Euclidean zones to promote more flexibility in land use than would otherwise be possible.

However, a close examination of the statutory requirements for floating zones as well as their implementation over the past 20 years has revealed that they rarely can fulfill their purpose. They are used infrequently, owing to cumbersome procedural burdens and overly restrictive development standards once rezoning is granted. To promote a more nimble and user-friendly land use regime, I propose the following changes be considered:

- **Broaden the applicability of different zones and reduce the stringency of application prerequisites**
- **Shift more detailed discretionary review to site plan approval, rather than floating zone approval**
- **Reconsider the role of the Office of Zoning and Administrative Hearings (OZAH)**
- **Permit more diversity in development once a rezoning is approved**

Introduction

Like most North American jurisdictions, Montgomery County is vested with the authority to dictate the use and development patterns of the land within the county's borders, a tool generally referred to as zoning. Each zone carries with it regulations concerning the types of activities (businesses, housing, manufacturing, etc.) that are allowed to exist with the geographic area to which the zone applies, as well as the heights and physical massing of structures, their location within a parcel, and the density of housing units permitted.

The geographic areas in which a zone applies are generally dictated through the master planning process, wherein discrete regions of the county are examined in a lengthy procedure involving substantial community participation facilitated by staff at the Montgomery County Planning Department. Master plans establish a vision for future land use in the designated region and are written over a period of years before being recommended by the Planning Board and then approved by Montgomery County Council.

Due to the county's size and geographic diversity, master plans are intended to "look ahead" 20 years, though they may be revised before that. In some cases, more than 20 years may elapse before an area's zoning is reconsidered writ large. For example, Kensington was initially examined as a part of the 1989 Kensington-Wheaton Communities Master Plan and did not receive an update until the 2012 Kensington Sector Plan. Residents and planners are thus tasked with predicting a region's land use needs far into the future during each master planning process, a difficult prospect during periods of political and economic stability, to say nothing of the volatility in which we now find ourselves. After all, would planners and residents working in 2019 have anticipated the COVID-19 Pandemic less than a year later and the many changes in commerce and commute patterns that it wrought? The question arises how Montgomery County's zoning can retain a degree of flexibility and responsiveness in the face of societal change while still providing some level of predictability.

One answer could be the floating zone, which the American Planning Association defines as follows:

"*...a zoning district that delineates conditions which must be met before that zoning district can be approved for an existing piece of land. Rather than being placed on the zoning map as traditional zones are, however, the floating zone is simply written as an amendment in*

the zoning ordinance. Thus, the zone "floats" until a development application is approved, when the zone is then added to the official zoning map." [1][2]

The floating zone provides a legal mechanism, known as a local map amendment (LMA) in Montgomery County, for applicants (typically property owners) to request a change in the zoning of an individual parcel. This may permit them to redevelop the property to a different use or expand the footprint or intensity of an existing use beyond what is typically allowed within the base zone. In theory, floating zones address the issue of inflexible land use regulations by enabling piecemeal adaptation on a parcel-by-parcel basis. In practice, the devil is in the details. Floating zones may only be applied for in certain circumstances. If not recommended in a master plan, they must meet certain prerequisites. They must proceed through a certain administrative process requiring multiple levels of approval. When they finally are granted, a floating zone does not permit anything and everything to be built – floating zones have standards just as base zones do.

This report will investigate how the confluence of these factors – applicability, approval process, and development standards – affect the utility of the county's floating zones. It will ask whether floating zones, as implemented, fulfill their theoretical purpose and, if not, propose methods to better meet that purpose. Floating zones are a legitimate tool in our land use toolbox. If they cannot function as intended, our zoning will remain at risk of extreme rigidity and fail to accommodate economic and social pressures, leading to stagnation.

Thrive Montgomery and County Planning Objectives

Beyond simply pursuing flexibility for its own sake, special attention in our analysis should be paid to the long-term planning objectives laid out in Montgomery County's current general plan, *Thrive Montgomery 2050*, adopted in October 2022. The precepts and priorities expressed in this plan are intended to broadly guide the county's development for the next 30 years, crafted collectively through intensive community engagement and facilitated by Montgomery Planning. The plan centers three main goals:

1. Economic Competitiveness
2. Racial Equity and Social Justice
3. Environmental Health and Resilience

Recommendations in the plan are assessed in relation to these goals. Several of these relevant recommendations could find form in a rethinking of floating zones. The plan

[1] Property Topics and Concepts – American Planning Association
[2] In Montgomery County, development approval is a separate process than re-zoning, so floating zones do not automatically grant the former. The general concept is the same as the APA's definition, however.

identifies increasing housing production of all types, specifically the diversity of smaller homes and in already-developed areas, to help attract and retain workers of varying income levels, improve neighborhood racial and economic desegregation, and reduce commuting distances and transportation emissions. General regulatory flexibility in land use can further assist with the goals of creating more compact development areas that can dynamically add commerce and employment opportunities. The plan also focuses more granularly on urban design, noting the relationship between flexible site planning and adaptable, creative developments that can promote walkability and neighborhood-scale commercial activity. Floating zones present a unique nexus for all three of the county's 30-year planning goals to be advanced. Though no single LMA will transform a neighborhood in one fell swoop, they can instead provide gentle transitions towards the more compact, diverse, human-centered urban form envisioned by *Thrive* on a property-by-property scale.

Floating Zones in Detail

Local map amendments, which govern property rezoning, have existed in some form in Montgomery County for many years, though they were significantly reformed during a 2014 update of the zoning ordinance to create the current floating zones. Prior to this, an LMA applicant could request any of the more than 60 base zones contained within the zoning code but had to comply with the purpose and intent of that zone in addition to zone-specific restrictions on who could apply[3]. The pre- and post-2014 LMA procedures are largely the same, but applicability standards and the necessary findings for approval were less defined. The 2014 update simplified the floating zones into fewer categories with clearer standards, with the idea of creating more flexibility. One question this report seeks to answer is whether this goal was accomplished.

[3] Pre-2014 floating zones varied based on the circumstances under which an applicant could request rezoning.

- R-4plex (Residential Fourplex): based on proximity to some type of land, use, or road classification.
- RMH (residential mobile home): based on tract parameters.
- C-Inn (Country Inn), TS (Transit Station), PN (Planned Neighborhood), PRC (Planned Retirement Community), PCC (Planned Cultural Center), OM (Office building, moderate), CT (Commercial, transitional), C3 (Highway commercial), RT (Residential townhouse), RH (Multiple Family, high-rise planned residential, CP (Commercial Office Park), HM (Hotel Motel), RS (Rural Service), & I3 (Technology and Business Park): no required parameters to request zone, but must meet regulations.
- PD (Planned Development): based on density of pre-existing Euclidean Zone (allows minimum of at least 2 units per acre) and must be able to construct 50 units (with several qualifications).
- MXPD (Mixed Use Planned Development) & LSC (Life Sciences Center): based on master-plan recommendation for specific zone.
- TSR (Transit Station, residential) & TSM (Transit Station, mixed): within transit station development areas or when adjacent to a CBD.
- MXN (Mixed Use Neighborhood): based on master-plan recommendation for "multi-use development at a neighborhood scale".

We should first begin by understanding the intent statement of the current floating zones within Montgomery County's Zoning Ordinance. This text serves as legal direction in their deployment and suggests certain restrictions that can influence their use:

"A. Implement comprehensive planning objectives by:

1. *furthering the goals of the general plan, applicable master plan, and functional master plans;*
2. *ensuring that the proposed uses are in balance with and supported by the existing and planned infrastructure in the general plan, applicable master plan, functional master plan staging, and applicable public facilities requirements; and*
3. *allowing design flexibility to integrate development into circulation networks, land use patterns, and natural features within and connected to the property; and*

B. Encourage the appropriate use of land by:

1. *providing flexible applicability to respond to changing economic, demographic, and planning trends that occur between comprehensive District or Sectional Map Amendments;*
2. *allowing various uses, building types, and densities as determined by a property's size and base zone to serve a diverse and evolving population; and*
3. *ensuring that development satisfies basic sustainability requirements, including open space standards and environmental protection and mitigation; and*

C. Ensure protection of established neighborhoods by:

1. *establishing compatible relationships between new development and existing neighborhoods through limits on applicability, density, and uses;*
2. *providing development standards and general compatibility standards to protect the character of adjacent neighborhoods; and*
3. *allowing design flexibility to provide mitigation of any negative impacts found to be caused by the new use."*

One can quickly note the tension in these statements, particularly between parts B and C. Can floating zones "serve a diverse and evolving population" while "protect[ing] the character of adjacent neighborhoods"? What truly "protects" existing development? At some point, character must evolve as well. This requires change, however gradual, such that floating zones must in some way make incremental steps towards a new "character". This tension, as we will later see, has impacted the intended flexibility and implementation of the county's floating zones.

The 2014 Zoning Code contains four categories of floating zone – residential (RF), commercial/residential (CRF), employment (EF) and industrial (IF), all of which have their own subcategories. C/RF, EF and IF are categorized primarily by allowed use, while RF zones are categorized by housing typology and unit density. C/RF, EF and IF zones are regulated primarily by floor area ratio (FAR). Setbacks and building heights are established in the floating zone plan, with heights being further limited by the zone itself. They are also subject to compatibility standards as detailed in Section 4.1.8.B of the County zoning ordinance. RF zones are subject to the same limitation with regards to setbacks and heights.

Residential	Commercial/Residential	Employment	Industrial
Residential Detached Floating (RDF)	C/R Neighborhood Floating (CRNF)	General Retail Floating (GRF)	Industrial Light Floating (ILF)
Townhouse Floating (TF)	C/R Town Floating (CTF)	Neighborhood Retail Floating (NRF)	Industrial Moderate Floating (IMF)
Apartment Floating (AF)	C/R Floating (CRF)	Employment Office Floating (EOFF)	
		Life Sciences Center Floating (LSCF)	

Table 1: Current Floating Zone Categories

Applicability

The first layer of regulation on the use of floating zones is in their applicability; an applicant may only seek an LMA if their parcel complies with certain standards, shown in Figure 1, below.

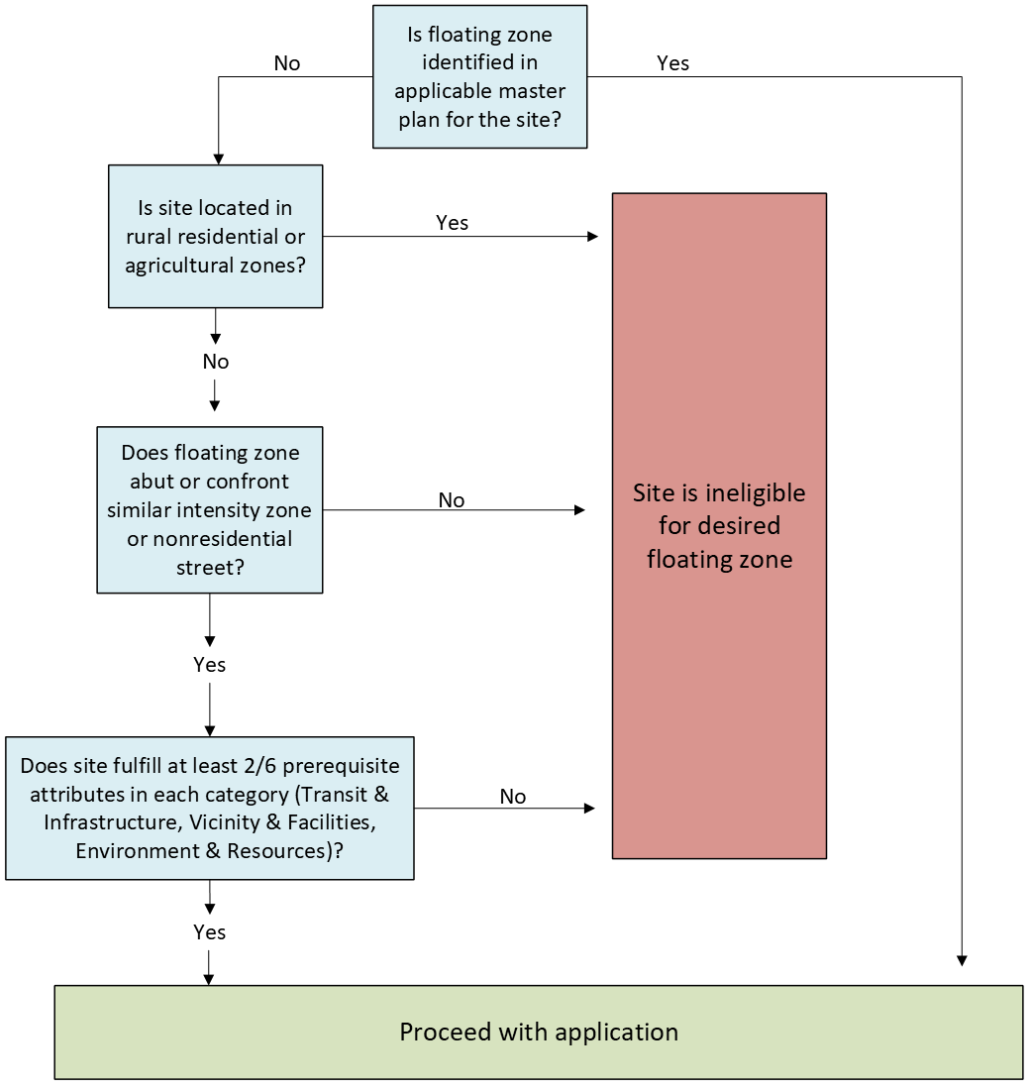

Figure 1: Floating Zone Applicability Summary

Floating zones are not currently permitted in Rural Residential and Agricultural zones, and this report does not recommend a change to this standard. As noted above, *Thrive's* compact development goals would preclude additional development options in low-density rural areas distant from transit and commerce.

Next, floating zones face no additional prerequisites if they are recommended within a master plan. As noted earlier, decades pass before a region is revaluated for a new master plan. Floating zones proscribed in the master plan process are often limited. For

example, the *2020 Forest Glen Montgomery Hills Sector Plan* only recommends two CRF zones on specific sites and provides exact height and FAR limits for each; any deviation from these will not fulfill this prerequisite. As floating zones are a more niche tool, they may not be deeply contemplated during the master plan process, resulting in restrictive applicability.

If a floating zone is not recommended by a master plan, which will typically be the case, prospective applicants must fulfill additional prerequisites to file for rezoning. With the exclusion of an application for an RDF zone, a property in a residential base zone applying for a floating zone must front on a non-residential street or confront or abut property not in a single-family residential zone. Employment and mixed-use zones (all C/RF and EF) must front a non-residential street[4] or abut or confront an existing C/R or employment base zone. Industrial floating zones must abut an existing industrial base zone.

Parcels that fulfilled these initial applicability criteria were mapped by Montgomery Planning and can be found at the following link: Floating Zone Applicability[5]. Samples of the TF and AF applicability zones at a smaller scale are reproduced in figures 2 and 3.

[4] Non-residential streets are defined as "A right-of-way with a classification of Downtown Boulevard, Downtown Street, Town Center Boulevard, Town Center Street, Boulevard, Major Highway, Area Connector, and Industrial Street under Chapter 49" Montgomery County Zoning Ordinance Section 1.4.2

[5] Maps may include public property and utility or railroad rights-of-way that would not be available for development. Municipalities with independent zoning authority are not completely excluded from the Non-Residential Highway Parcels layer.

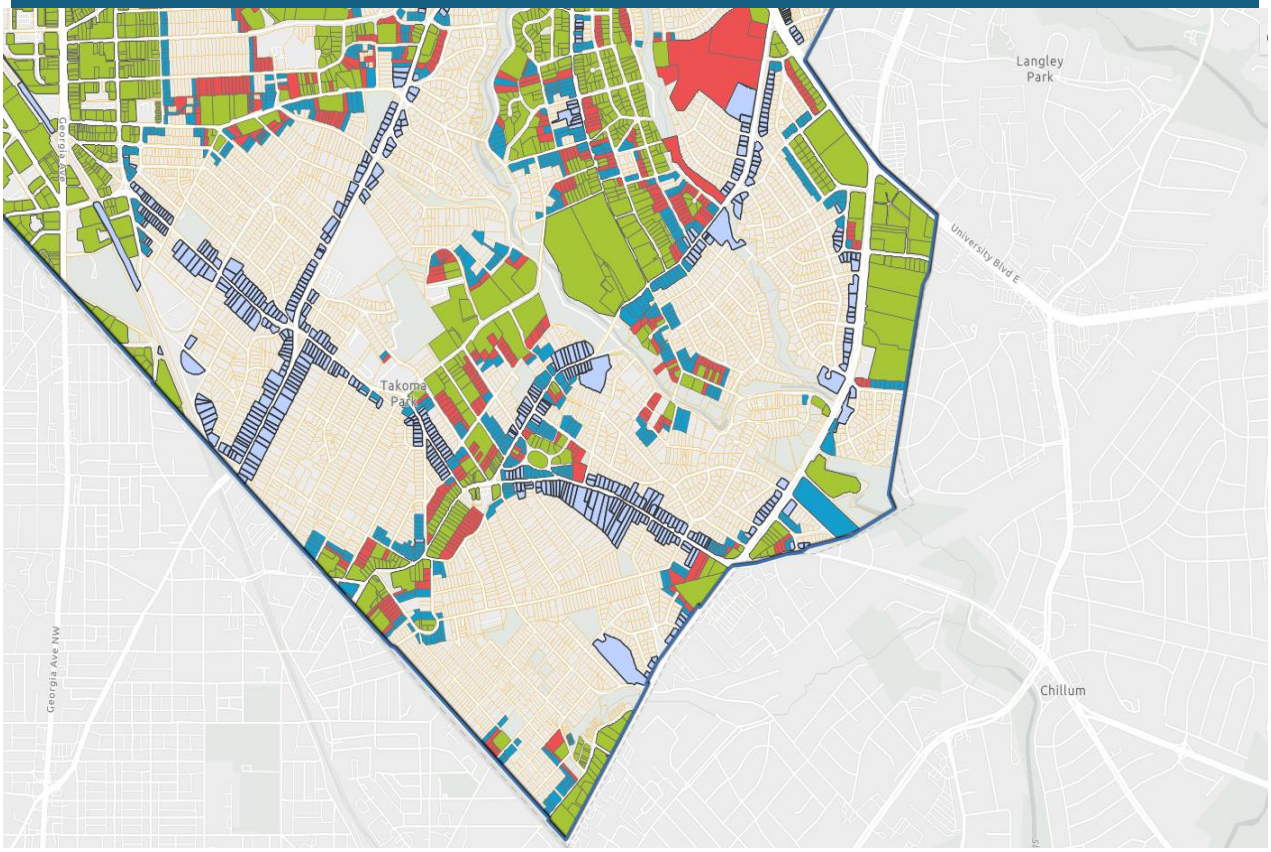

Figure 2: TF and AF geographic applicability for Takoma Park region

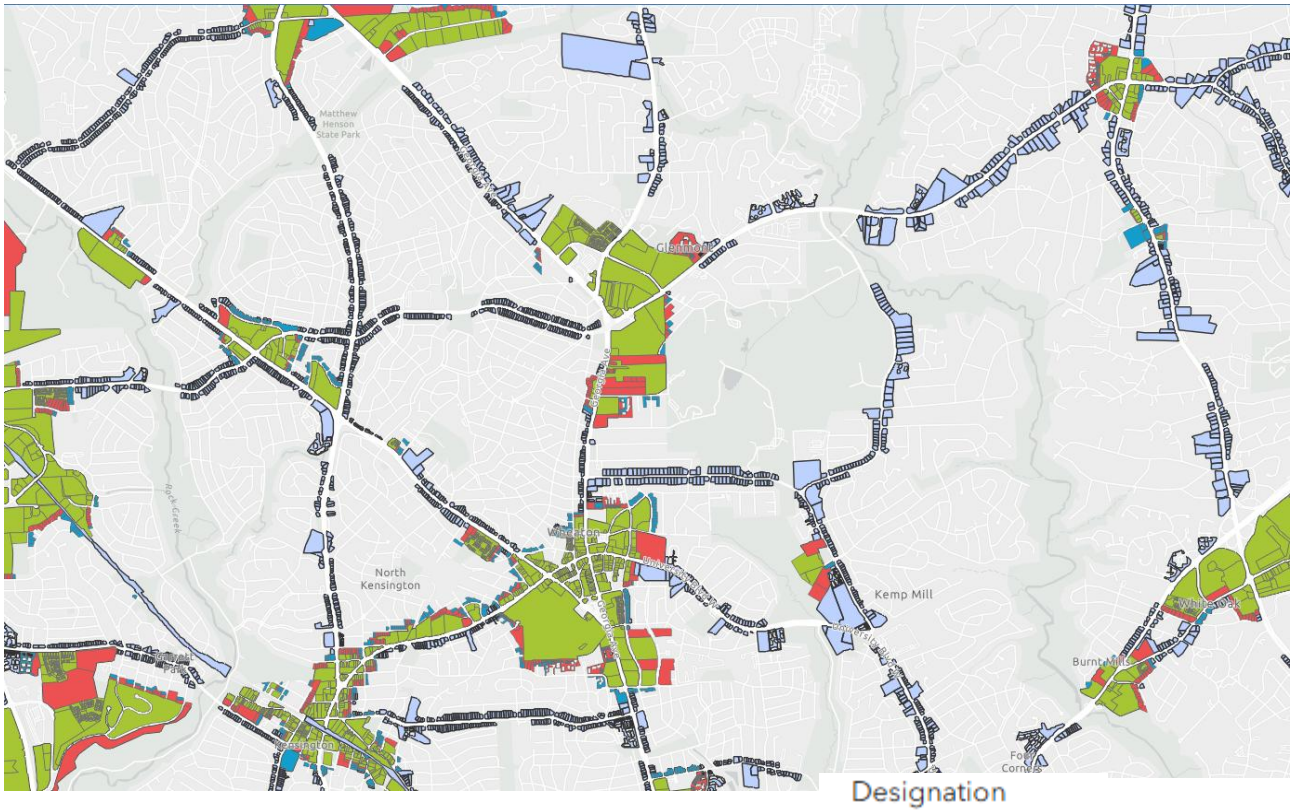

Figure 3: TF and AF geographic applicability for Wheaton/Glenmont region

Though these initial applicability standards are somewhat generous, a floating zone not identified in a master plan must additionally fulfill two prerequisites from each of the following three categories:

Category	Prerequisite Choice
Transit & Infrastructure	At least 75% of the site is within ¼ mile of a Level 3, ½ mile of a Level 2, or ¾ mile of a Level 1 transit station/stop.
	The site has frontage on and vehicular, bicycle, and pedestrian access to at least 2 roads, at least one of which is nonresidential.
	The site is served by existing water and sewer infrastructure that will not require either an upgrade to the service line or installation of a pump station due to the proposed development.
	All signalized intersections within ¼ mile of the site boundary are operating below the applicable congestion standard.
	The project is age-restricted or senior housing, or if proposing development that may generate students, the site must not be in an area that is under moratorium due to school capacity or result in a school utilization rate greater than 120% because of the proposed development. For any site within 2 school clusters, only the portions of the site that satisfy this requirement can proceed.
Vicinity & Facilities	The site is in a transitional location between property in an existing Residential Multi-Unit, Residential Townhouse, or non-Residential zone and property in a Residential Multi-Unit, Residential Townhouse, or Residential Detached zone.
	The site is adjacent to a bicyclist route that provides access to commercial services within 3 miles.
	The site is adjacent to a route that provides access to an existing or master-planned school within ½ mile.
	The site is adjacent to a pedestrian route that provides access to existing public park and recreation facilities that satisfy a minimum of 30% of the recreation demand under the Planning Board's Recreation Guidelines, as amended, within ¾ mile.
	The site is adjacent to a pedestrian route that provides access to an existing grocery store or County-permitted farmer's market within ¼ mile.
Environment & Resources	The limits of disturbance for the development will not overlap any stream, floodplain, wetland, or environmental buffer or any slopes greater than 25% or slopes greater than 15% where erodible soils are present.
	The site does not contain any forest or, if forest is present, the limits of disturbance for the development will not reduce the forest cover to less than an area of 10,000 square feet and width of 35 feet at any point.
	The site does not contain any rare, threatened, or endangered species or critical habitats listed by the Maryland Department of Natural Resources.
	The site is on land containing contaminated soils and is developed in conjunction with an environmental Voluntary Cleanup Program under the Maryland Department of Environmental Protection.
	The site is currently developed with more than 75% impermeable surfaces, including paving and roofed structures, and does not currently provide stormwater management meeting the standards applicable on the date of filing.

These prerequisites were developed during the 2013-2014 rewrite of the county's zoning ordinance and were roughly based upon LEED for Neighborhood Development (LEED ND) Standards. A former county planner who helped to craft them, having then utilized this process while in the private sector, admitted during an interview that these prerequisites were much more difficult to meet in practice than they had anticipated in 2014. He indicated that while the Environment & Resources category is relatively straightforward, the adjacency to schools and commercial services is challenging due to the relative scarcity of mixed-use zones within the county and the fragmented nature of the bicycle network. LEED ND considers the design of entire neighborhoods, which may be appropriate for large, multi-acre sites, but could prove onerous for smaller-scale developments.

Procedure

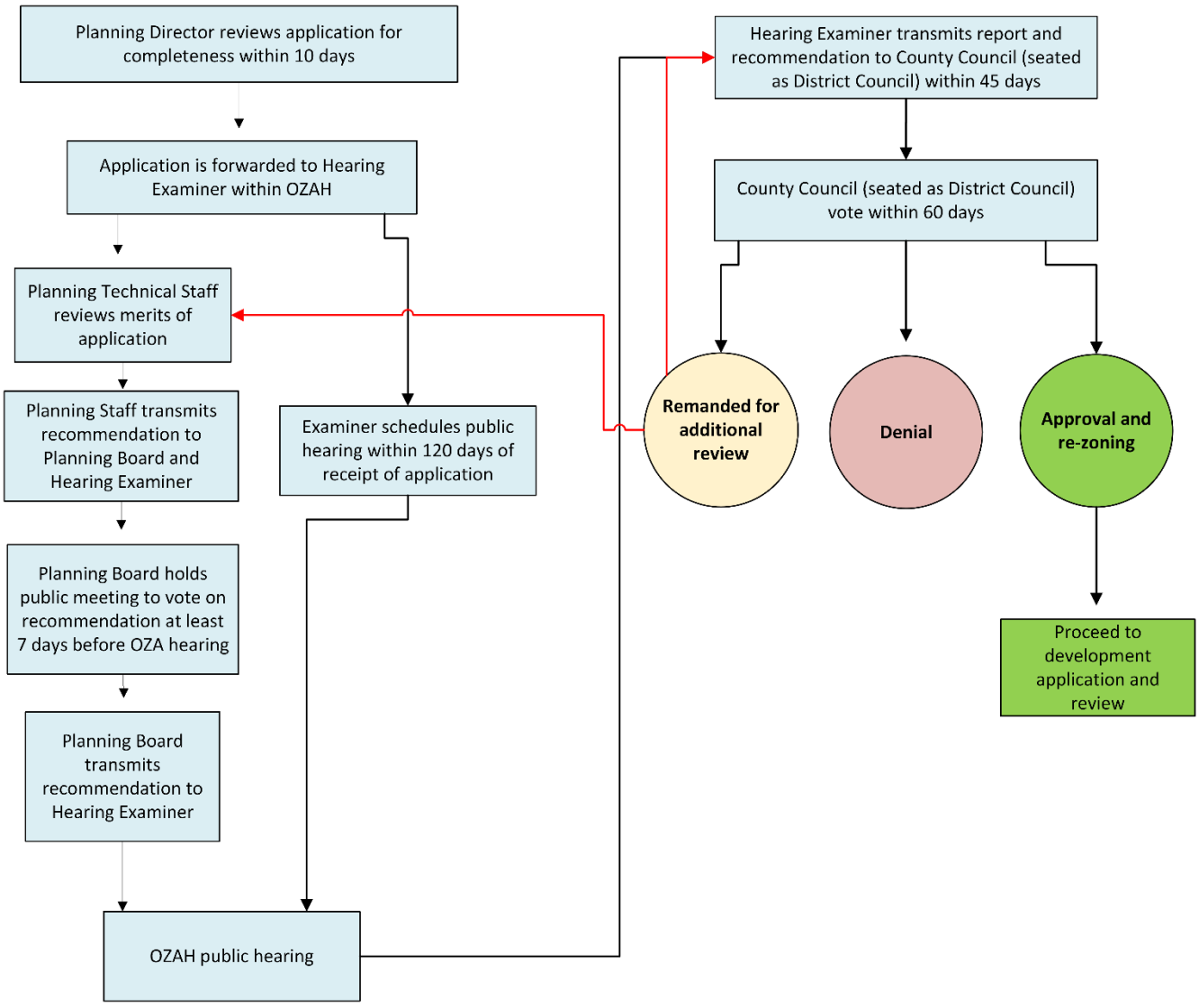

Figure 2: Floating Zone Approval Process Flowchart

An applicant, having met the necessary prerequisites for their floating zone request, must then proceed through the review and approval process, summarized in Figure 4.

Complete applications must contain the materials specified in section 7.2.1.B of the county zoning ordinance, including disclosures of ownership and substantial interest, political contributions to county council or county executive candidates, and a statement describing "how the proposed development satisfies the criteria to grant the application". The application also requires a document known as a floating zone plan, which will be discussed in more detail in a later section. This type of plan is unique to the floating zone and is distinct from a site plan, which will also be required later during development review after the rezoning is granted.

Once the Planning Department determines the LMA application contains these required materials, they forward the application to the Office of Zoning and Administrative Hearings (OZAH), which is housed within the legislative branch of county government and distinct from both the Council and Planning Department. The OZAH Hearing Examiner will schedule a public hearing, a quasi-judicial process wherein applicants, proponents and/or opponents of the proposed rezoning give testimony to aid in the Examiner's recommendation.

Before this hearing occurs, which must be scheduled within 120 days of receipt of the application, the Planning Board conducts a parallel review process. Technical staff will first make a recommendation based upon the merits of the application – whether and to what extent the proposed development fulfills the intents of the desired zone – and transmit that to the Planning Board. The Board will then hold a public meeting (no less than 7 days before OZAH's hearing) where they will deliberate and make their own recommendation on the LMA.

All materials are then advanced to the Hearing Examiner, who will hold a public hearing, write a summary report of their findings and other findings from Planning, and make one final recommendation for the County Council. The Hearing Examiner must do so within 45 days of the close of public hearing.

Finally, the County Council, who for the purposes of the LMA are seated as the District Council, will vote on the fate of the application. This step must occur within 60 days of receipt of the Hearing Examiner's report, though the Council can choose to delay this. The Council may choose to hear oral arguments from any interested party during this time. At final vote and based on the Planning Board and Hearing Examiner's review and recommendations as well as the defined necessary findings, the Council may choose to approve, deny, or remand the application back to the Hearing Examiner for further review

and possible revision. Following the Council's decision, any aggrieved party may file a petition for judicial review to appeal the fate of the LMA. An LMA may be approved with a majority vote unless the Planning Board or municipality in which the parcel is located recommended disapproval, in which case a 2/3 vote is required.

Per the time limits imposed by this procedure, a typical LMA should, in theory, require at most 205 days between application and decision. As we will see, this expectation does not bear out in practice. The most problematic elements of this process will be examined in detail in a subsequent section.

Development Standards

The final control on the utility of floating zones are the development standards to which they are subject. As mentioned earlier, residential floating zones are regulated by use, building type and density. Uses are restricted by the floating zone category and site density as detailed in Section 5.2.3.A. Functionally, residential floating zones support residential uses, with some limited commercial uses at larger project sizes with higher densities.

The RDF zone only permits detached, single-family homes and the commercial uses described above. The TF zone permits detached homes, townhomes and duplexes, and the AF zone permits all these as well as apartment buildings. Permitted density is governed not by the floating zone itself, but the base zone to which the rezoning is applied. Lower-density base zones retain lower densities as floating zones, which primarily serves to reinforce existing development patterns. If a floating zone is recommended in a master plan, then the density is established there. Otherwise, the following limits apply:

Pre-Existing Euclidean Zone	Base Lot/Site Size	Base Density in Units per Acre	Maximum Allowed Density in Units per Acre		
			Less than 3 times the base lot/site size	3 to <6 times the base lot/site size	At least 6 times the base lot/site size
RE-2, RE-2C	2 acres	0.5	0.5	0.75	1
RE-1	40,000 SF	1.09	1.09	1.63	2.18
R-200	20,000 SF	2.18	2.18	3.27	4.36
R-90	9,000 SF	4.84	4.84	7.26	12
R-60	6,000 SF	7.26	7.26	10.89	14.52
R-40	4,000 SF	10.89	10.89	16.33	21.78
TLD	20,000 SF	9	9	13.5	18
TMD	20,000 SF	12	12	18	24
THD	40,000 SF	15	15	22.5	30
R-30	12,000 SF	14.5	14.5	21.75	29
R-20	16,000 SF	21.7	21.7	32.55	43.4
R-10	20,000 SF	43.5	43.5	65.25	87

Table 2: Residential Floating Zone Development Standards

As the above table describes, a site must be more than 3 times the minimum lot size of the current zone to be eligible for any increase in density. For example, a 12,000 square foot lot in an R-60 zone (for which the minimum lot size is 6,000 sq ft) would gain no additional density from a residential floating zone. Such a lot can support, at most, two single-family detached homes under the base R-60 zone. Even if a TF zone is granted, these single-family homes could instead become a single duplex (as that use is not permitted in the RDF zone), but nothing beyond that. An 18,000 square foot lot would permit an additional 2.5 units at most. These limitations have perhaps the most profound impact on floating zones' utility.

Otherwise, standards such as lot size and setbacks of the new zone are established during site plan review within the Planning Department, after the LMA is approved. Parking and screening requirements are dictated by the base zone, while open space requirements range from 0-30% based on building typology and density. Higher density projects with more intense massing require the highest percentage of open space.

C/RF, EF and IF zones are regulated similarly, but with FAR instead of unit density. During the master plan process, recommended floating zones are given FAR and height limits. For floating zones not recommended in a master plan, the following limits apply for each floating zone category:

Density Allowed – Commercial/Residential and Employment Floating Zones			
Pre-Existing Euclidean Zone	**Maximum Total Density Allowed in FAR Based on Size of Tract in Acres**		
	Less than 0.5 acres	0.5 acres - 3.00 acres	Greater than 3 acres
RE-2, RE-2C, RE-1, R-200	0.75 FAR	1.0 FAR	1.25 FAR
R-90, R-60, R-40, TLD, TMD, THD	1	1.25	1.5
R-30, R-20, R-10	1.25	1.5	1.75
CRN	1	1.25	1.5
CRT	2	3	4
CR	4	6	8
Employment	2	3	4
IL, IM	0.75	1	1.5

Table 3: Commercial/Residential Floating Zone Development Standards

Density Allowed – Industrial Floating Zones			
Pre-Existing Euclidean Zone	**Maximum Total Density Allowed in FAR Based on Size of Tract in Acres**		
	Less than 0.5 acres	0.5 acres - 3.00 acres	Greater than 3 acres
RE-2, RE-2c, RE-1, R-200	0.50 FAR	0.75 FAR	1.00 FAR
R-90, R-60, R-40, TLD, TMD, THD	0.75	1	1.25
R-30, R-20, R-10	1	1.25	1.5
CRN	0.75	1	1.25
CRT	1	1.25	1.5
CR	2	2.5	3
Employment	1	1.25	1.5
Industrial	2	2.5	3

Table 4: Industrial Floating Zone Development Standards

Each C/RF, EF, and IF zone has a corresponding Commercial/Residential, Employment, and Industrial base zone to which they roughly align which determines their allowed uses. Within the C/RF family of floating zones, the CRF subcategory is the most permissive while the CRNF subcategory is the least permissive.

EF zones are more targeted to the specific use, while IF zones are targeted toward the intensity of industry. Any building type is permitted within C/RF zones and EF zones, while building types in IF zones are limited by the corresponding base zone.

We will revisit many of these floating zone controls after an analysis of the use of floating zones over the past 20 years to determine where and how they might be improved.

Evaluation

OZAH retains publicly available digital records for all LMAs approved since 2004. As an update was performed in 2014, this gives us a convenient 20-year period in which to evaluate the use of floating zones, split evenly before and after 2014. A total of 80 LMAs have advanced to District Council action since 2004. The first was applied for in late 2003 and approved in 2004, while the most recent was applied for in 2024 and approved in 2025.

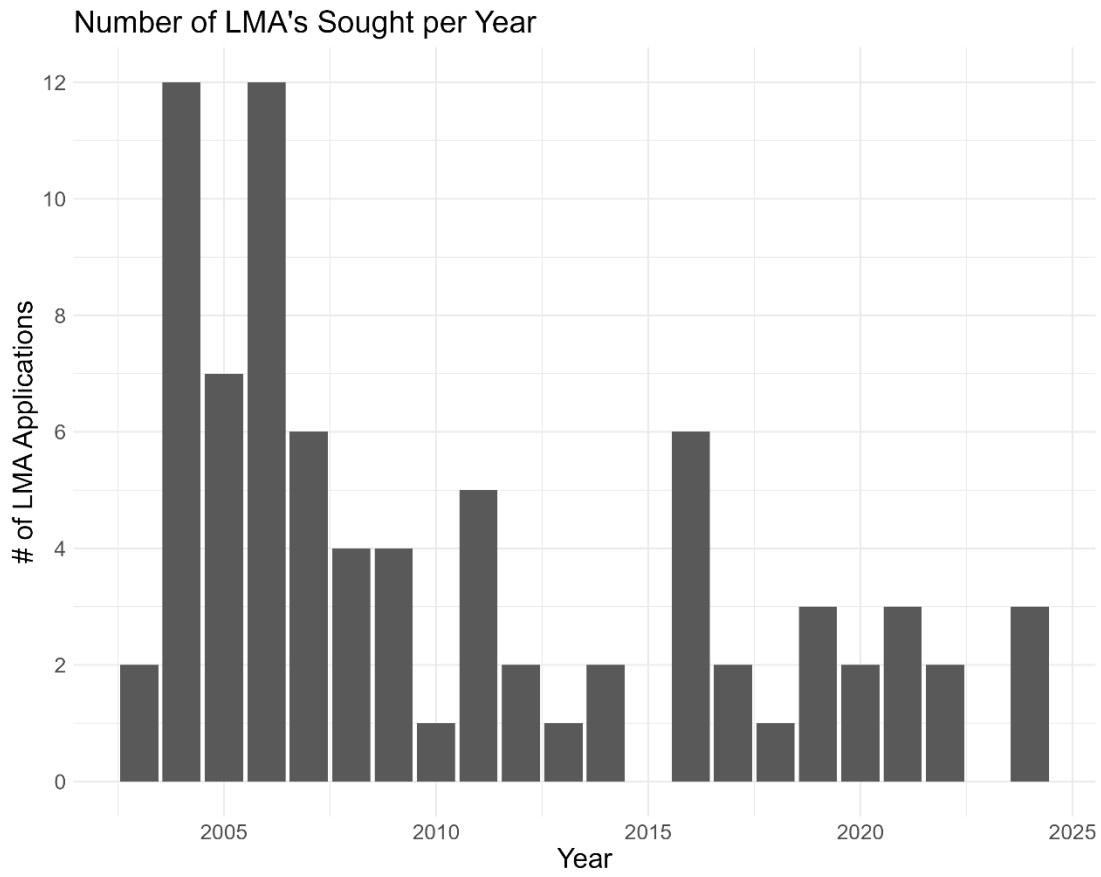

Figure 3: Graph of LMA applications per year

Overall, LMAs are not particularly common. There was a decline in their use following 2009, likely because of the Great Recession, and even after the 2014 reform few floating zones have been sought. Of the 80 for which we have data, only 22 occurred since 2014. Three of these were withdrawn by the applicant, but the remainder were approved. Some LMAs do not advance to District Council because of early withdrawal, but OZAH does not always maintain accessible records for these. Current and former planning staff have said in interviews that they have also counseled potential applicants against pursuing an LMA in circumstances where public controversy was likely to erupt due to density or scale. They also indicated that Planning staff, anticipating the intense scrutiny and

investment required for eventual approval, will guide applicants towards less ambitious plans.

As indicated earlier, the LMA approval process should not endure for much longer than 205 days based on procedural time limits dictated in the zoning ordinance. These limits did not exist prior to 2014. Below are the mean processing times for LMA's by year.

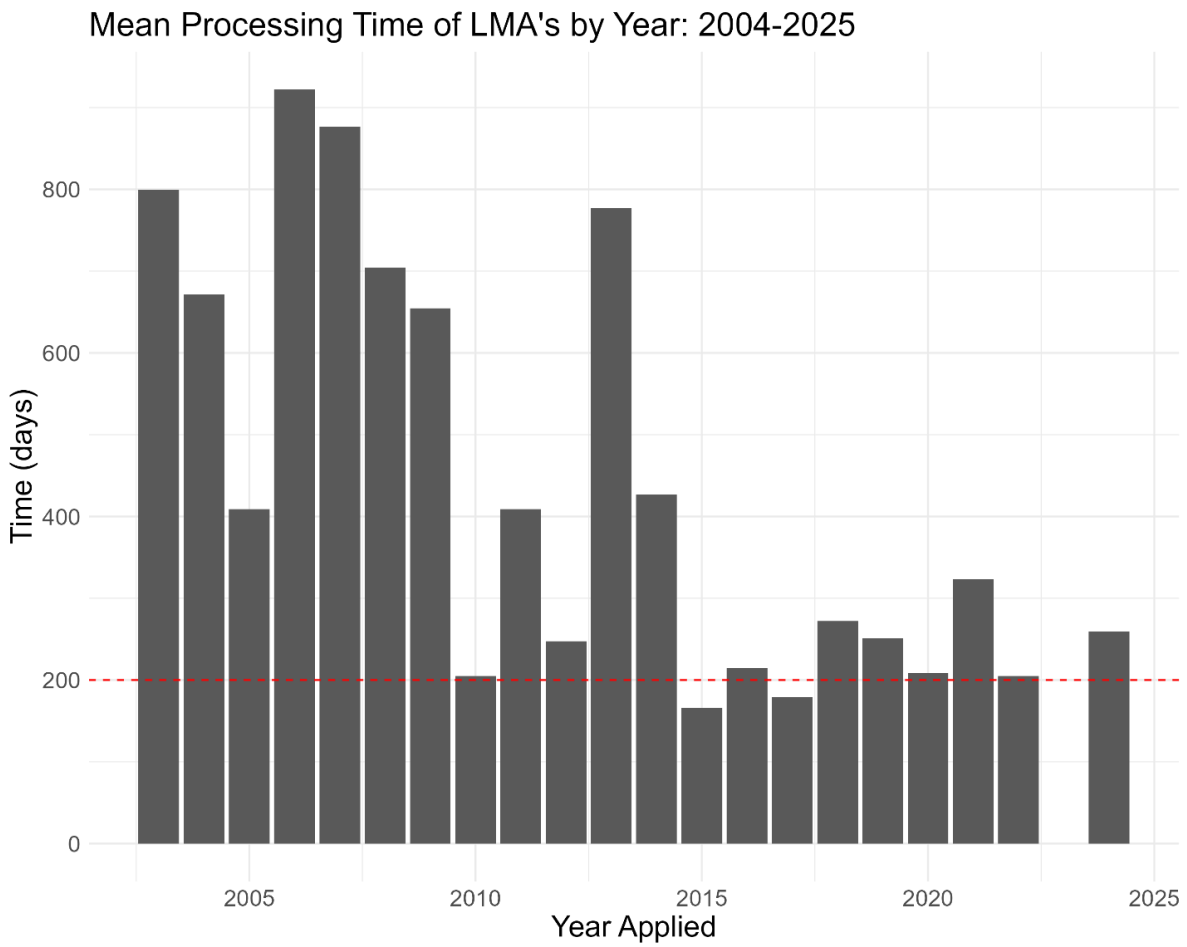

Figure 4: Mean Processing Time of LMA's by year

The processing time is the number of days between the date of application and the date of final District Council action.

Though time from initial application to final action did decrease substantially following the 2014 reforms, in multiple years the average time to resolve an application still far exceeded the rough maximum established in code. In 2021, the mean process time was 313 days. Additionally, only 1/3 the number of applicants sought LMA's after 2014 than before 2014, so the decrease in process time could simply be a result of increased administrative capacity rather than the reforms *per se*. Additionally, it bears asking whether

even 200 days is a reasonable length of time in which to resolve the rezoning of a single parcel.

Why did substantially fewer LMA's come before the Council after 2014 than in the prior decade? While we cannot ignore macroeconomic factors in the real estate development market, one more immediate clue could derive from an analysis of the category of zoning change sought and the location of these changes:

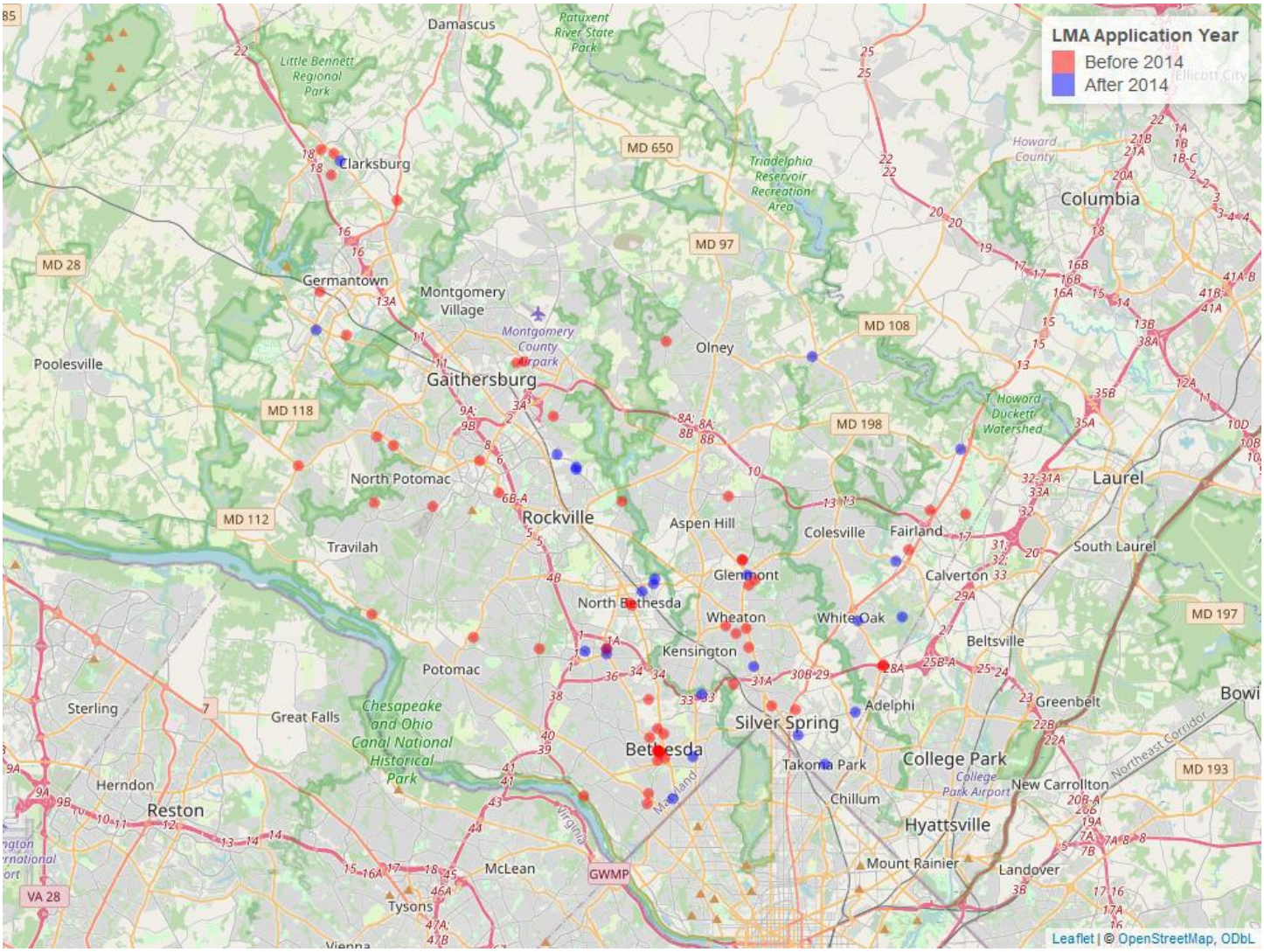

Figure 5: Map of Local Map Amendments: 2004-Present

Figure 8 displays the approved transitions from each base zone to each applied-for zone where an applied-for zone was sought more than twice. Most of the rezonings sought were from single-family detached zones (R-200, R-60, R-30 and R-90) to PD (planned development) and RT (residential townhouse) zones. PD and RT zones were replaced in the

2014 update (largely with the TF, AF and CRNF floating zones), so this figure in one respect illustrates a zoning and development pattern from before 2014.

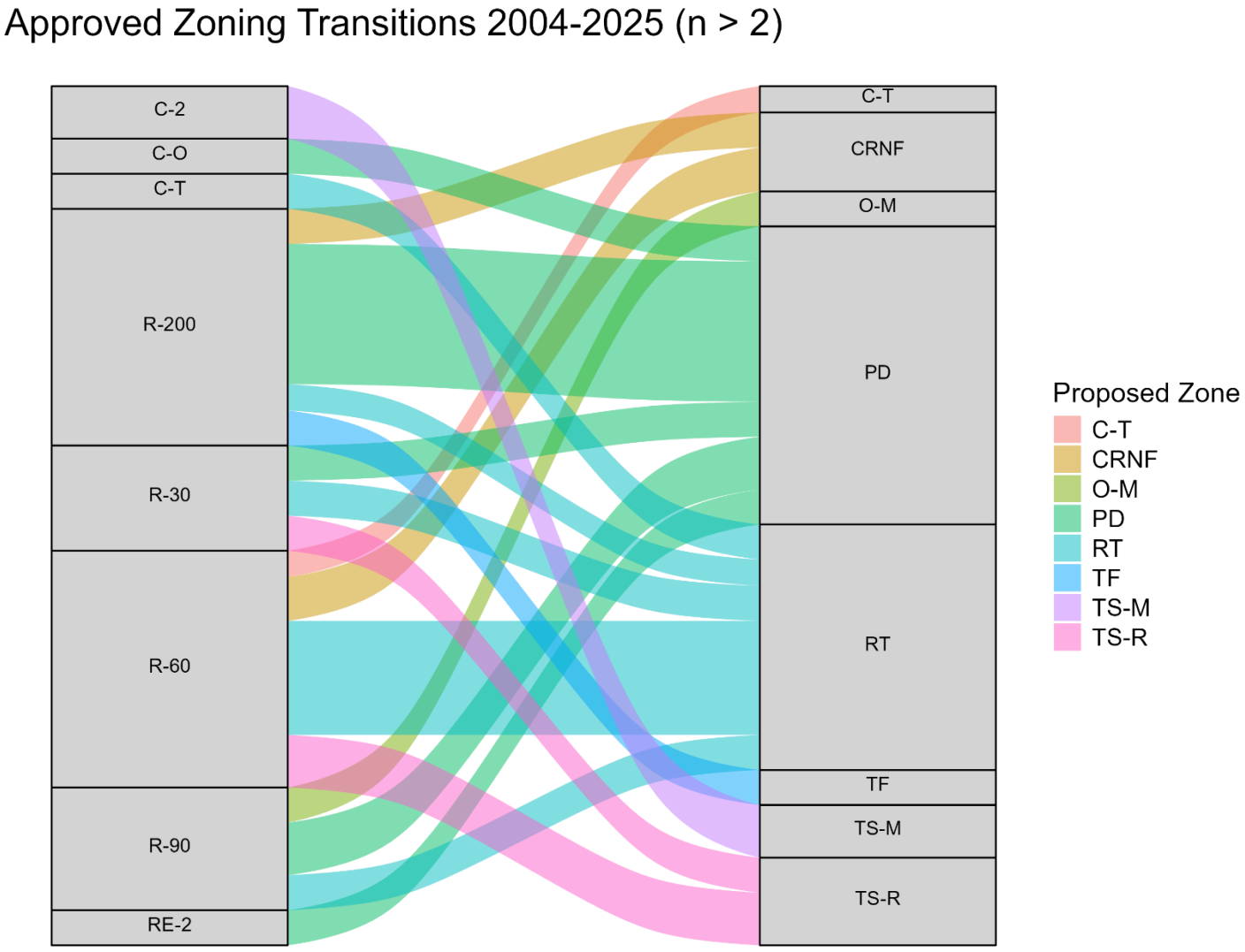

Figure 6: Approved Zoning Transitions Alluvial Graph

The only post-2014 common rezonings on this figure are the TF and CRNF zones, which make up a relatively small proportion of the total number of LMA's approved.

Figure 9 displays the requested *use* change where a change pattern occurred more than twice, based on the description of the project. We can see that most of the converted lower-density residential or vacant land into townhome developments or redeveloped existing multifamily property.

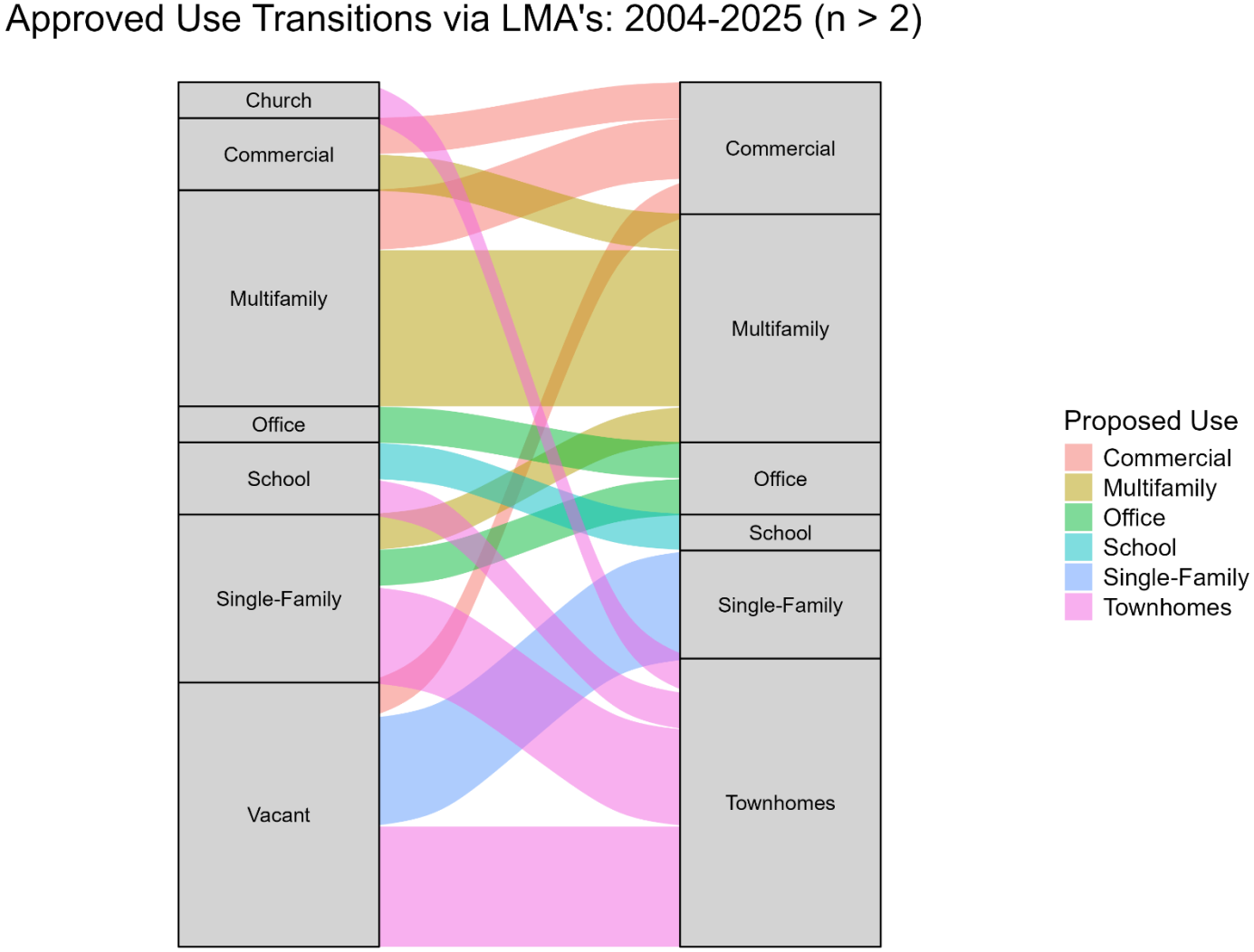

Figure 7: Approved Use Transitions Alluvial Graph

Altogether, this data paints a picture of the decreasing utility of LMA's. In the early to mid-2000's, the availability of applicable vacant or underdeveloped parcels was high enough to allow rezoning and additional development. We can see this in the number of pre-2014 projects around Germantown and Clarksburg, and the redevelopment occurring in Bethesda. As time passed, these opportunities declined significantly. While floating zones were adjusted in 2014, their utility was not expanded sufficiently to make the tool effective. It is also likely that, as land values in Montgomery County have increased, the acreage required for redevelopment under a floating zone has rendered them even more limited.

With this understanding, we must determine how floating zones could be improved to better serve the county's long-range planning goals of enabling housing production,

housing diversity, and economic activity in existing developed areas. This will require simpler floating zones with additional flexibility and broader applicability.

Recommendations

As before, I have divided recommendations into three categories: applicability, approval process, and development standards. Each element of floating zones could be addressed individually, but all elements will likely need to be addressed for floating zones to fulfill their potential.

Applicability

Generally, applicability could be broadened to accommodate more re-zoning opportunities. These prerequisite changes would apply to those floating zone applications not listed in the relevant master plan. It should be noted that allowing more parcels to apply for re-zoning will not inherently produce additional development, nor necessarily predict approval of the requested rezoning. An LMA may still be reasonably rejected for not fulfilling the necessary findings for approval, which are further examined below. Broadening applicability will merely increase the total pool of candidates.

1. **Loosen geographic limitations**. As mapping has shown, the number of parcels that front a non-residential road or abut/confront a similar intensity parcel is quite high. Despite this, the AF zone has never been used, and the TF zone has been used only three times since 2014. Applications for these zones could be broadly accepted in all residential base zones. This would mean that any parcel in an RE, R-40, R-60, R-90, or R-200 zone could apply for a Townhouse or Apartment Floating zone. C/R floating zones are the most common post-2014 and could be permitted to abut or confront residential multifamily, and even townhouse zones, which include R-10, R-20, and R-30 zones as well as Townhouse Low-, Medium- and High-density zones. EF zones could be subject to these same standards, given an interest in co-locating homes and job centers. I do not recommend applicability changes to the IF zones at this time, but a further study could be undertaken to determine whether there are specific industrial uses for which the county would desire rezoning flexibility and may not impose significant impacts on other high-density uses.

   Alternatively, the geographic limitations could remain largely as-is, with the potential addition for TF, AF, C/RF, and EF applicability within ½ mile of transit

stations. This change may capture some additional parcels excluded by the current standard that would be desirable for higher-intensity infill development.

2. **Simplify categorial prerequisites**. While a specific rewrite is not in the scope of this report, a few options could be considered:
   a) **Eliminating these prerequisites entirely and relying on the site plan review process:** Site plan approval is subject to necessary findings under 7.3.4.E of the county zoning ordinance, which include existing erosion, sediment control, stormwater management and forest conservation regulations, safe and well-integrated circulation, adequate public services and facilities, and neighborhood compatibility. These serve much the same purpose as the Floating Zone prerequisites and apply to all development performed in floating zones.
   b) **Exempting smaller projects from prerequisites** – larger, multiacre projects which add significant amounts of housing or commercial activity have a greater capacity to run afoul of the dense, mixed-use development patterns sought in *Thrive Montgomery 2050*. Smaller infill projects carry much lower impact risks and may also be disqualified by many of these prerequisites. An acreage or FAR threshold could be established to allow more of these projects to at least pursue rezoning.
   c) **Crafting an entirely new set of more flexible prerequisites:** The goals of LEED-ND align well with the county's long-term planning goals. Instead of abandoning the framework entirely, the Planning Department could craft new requirements that still encourage smart growth while not being overly burdensome and complex.
   d) **Eliminating or loosening only Vicinity and Facility prerequisites:** As these were cited specifically in interviews for this report, these could be more closely scrutinized in the absence of a full re-evaluation.

Approval Process

Cermakova et al. (2024) find that reducing the length of permitting processes increases the elasticity of real estate supply and can thus reduce the cost and price of housing, specifically in city centers. Manville et al. (2022) find greater levels of discretion in approval processes are associated with longer approval times and lower multifamily housing production. Our focus on procedural reform should thus be to decrease the time from application to action and to reduce the level of discretionary approval and improve certainty and consistency within the process. While there are many county permitting

processes that could be altered to help achieve this, this report will focus narrowly on LMA's and floating zones.

The Floating Zone Plan

This is a unique document that requires applicants to provide, at initial application, a complete plan of the proposed development, including building locations, massing, height, use, circulation diagrams, stormwater management, existing site conditions (including wetland and floodplain adjacencies), project phasing and a traffic study. According to one private sector planner, a floating zone plan is the work of at least 6 months and roughly $150,000 in site engineering and design. He cited, in particular, the traffic study as an expensive and onerous requirement at this early phase of the process.

Furthermore, the floating zone plan may impose binding elements upon the development, which are terms carried through with the rezoning that transmit with the land itself. For example, the Planning Board or Hearing Examiner may recommend approval of an LMA with the binding element that housing be constructed in a particular configuration, or that only designated commercial activity may occur between certain hours. If a floating zone is approved, but the applicant desists from eventual development, the property is now encumbered with this binding element. That land can only be developed in accordance with the approved floating zone plan, subject to a minor or major amendment process. Minor amendments can be made during site plan approval by the Planning Board, but major amendments (to allow a different use, alter a binding element, increase height/density or reduce a setback) require proceeding through the entire LMA process again.

Zoning is best understood as a framework for guiding a general class of development, rather than a proscription for a specific development configuration. The imposition of layout, massing, and precise circulation networks is best left to the site plan approval process, where the County can still regulate an individual development without legally burdening the underlying land.

I thus recommend simplifying the requirements of a floating zone plan. Instead of its current form, a floating zone plan could constitute site and surrounding context and a simple bubble diagram showing proposed site areas of each use, the maximum number of housing units and/or interior square footage sought, and the maximum height sought. Site plan details are appropriate to determine during the site plan approval process, not during the zoning process. This will considerably shorten review while providing a broad overview of the anticipated development while still providing flexibility for developers. Members of the public, Planning staff, and the Planning Board will have further opportunities to provide

input on development specifics during site plan review, and developers can be more responsive to feedback during this process.

Alternatively, the floating zone plan could remain as-is, but the development review process could be adjusted. Development with an approved floating zone plan could be exempt from many requirements of site plan review or could be given automatic approval after a specified time limit. This change would help to reduce procedural redundancy and total time to construction but does not resolve the issue of stringent binding elements.

The Role of the Hearing Examiner

LMA's are unique among zoning changes in that they substantially involve OZAH in their proceedings. Zoning text amendments (ZTA's), which can range far more broadly in their impacts, and sectional map amendments (SMA's), in which master plans are updated, do not require the input of a Hearing Examiner. Instead, review and recommendation are performed by a combination of the Planning Board and Planning staff, with final approval by the County Council. It begs the question why rezoning a single parcel is subject to a potentially even more stringent level of review than a ZTA, which could theoretically rewrite the entire use table or dimensional standards of all zones in one stroke.

I therefore recommend significantly reducing, or even eliminating, the role of OZAH in the floating zone approval process. Generally, this would align LMA's more closely procedurally with other zoning changes while reducing the level of redundancy in review and improving overall processing time. There are a few reasons to justify this change.

First, the county Planning Board's role in the local map amendment process is written into Maryland state land use law (MD Code, Land Use, § 22-208). This precludes reforming the process to remove the Planning Board from review, leaving only the Hearing Examiner as the fungible element. While Prince George's County does require a Hearing Examiner for review and recommendation in their version of an LMA, Howard County does not, instead referring a rezoning application (called a Zoning Map Amendment) directly from the Planning Board to the County Council, seated as the Zoning Board.

Furthermore, the quasi-judicial nature of OZAH hearings requires applicants to retain land use attorneys and submit their contracted professionals – engineers, private planners and designers etc. – as witnesses, all of whom must be compensated for their time. As these witnesses can further be cross-examined by other parties during the hearing process, and there is no time limit on the length of a hearing, the hearings can quickly become costly for applicants. There is also no strict definition of who constitutes an interested party in an LMA hearing, such as abutting residents or property owners, nor is

there a statutory time limit to testimony, such that any bad-faith actor or group of actors could significantly delay proceedings and burden applicants with additional cost and uncertainty.

An improved floating zone process would begin much the same, with applicants submitting their complete application to Planning. Staff would write a report and recommendation while the Planning Board schedules a public meeting and, if desired, a preliminary public hearing. If this reform is combined with a simplified Floating Zone Plan, the review time could be shortened to 60-90 days for staff and the Planning Board to make their recommendation, rather than the 120 required of the Hearing Examiner. The County Council would then schedule a public hearing with a minimum 30-day public hearing notice following this transmittal. Following this, the Council would take their vote. This reduces the theoretical maximum time from over 200 days to 100-120 days, particularly if combined with the simplified Floating Zone Plan. These changes in tandem could significantly reduce time between application and final action, while also reducing preparation time and cost for applicants. Ultimately, as the authority for a zoning change rests with the County Council, it should be their responsibility to hold the final public hearing on an LMA. This serves the dual purpose of streamlining the administrative approval process and exposing County Councilmembers more directly to public input.

It is important to remember that OZAH's public hearing is not the only form of input or feedback available to residents with an interest in the rezoning application. Members of the public may give testimony to the Planning Board. Residents will also have even more opportunities for input once the project reaches the development phase, when site-specific elements will be discussed during site plan review with the Planning Board. While many stakeholders in Montgomery County recognize the value of participatory deliberation, overburdening the zoning and development process with public input is not without cost. Research from Einstein, Glick & Palmer (2019) demonstrates that, all things being equal, more public input requirements are associated with reduced housing supply, and those projects that are built are smaller and take longer, which consequently increase development costs. They further show that public meeting participants are unrepresentative of the communities they inhabit, raising questions surrounding the interests expressed in our current participatory processes. The desire for community engagement must thus be balanced against the compelling interest in expanding the housing supply and encouraging infill development.

A compromise could entail requiring applicants to hold a pre-application community meeting to gather generalized feedback on development concepts, rather than specifics, before they even submit their LMA for approval. This allows for public input

before the applicant has invested significant time and expense into a design and application process. Both Prince George's and Howard County mandate this procedural step. However, requiring an additional pre-application meeting should only be combined with significant simplification of the remainder of the approval process.

Necessary Findings

These statements provide a standard on which the County Council (and Hearing Examiner) are intended to make their determination for approval or denial. Too stringent a standard may restrict the potential of floating zones, while a non-existent, or vague standard may create an unpredictable and opaque process. Necessary findings for LMA's are located in Section 7.2.1.E of the county Zoning Code as follows:

*" **E. Necessary Findings***

1. *A Floating zone application that satisfies Article 59-5 may not be sufficient to require approval of the application.*
2. *For a Floating zone application, the District Council must find that the floating zone plan will:*
   a. *substantially conform with the recommendations of the applicable master plan, general plan, and other applicable County plans;*
   b. *further the public interest;*
   c. *satisfy the intent and standards of the proposed zone and, to the extent the Hearing Examiner finds it necessary to ensure compatibility, meet other applicable requirements of this Chapter;*
   d. *be compatible with existing and approved adjacent development;*
   e. *generate traffic that does not exceed the critical lane volume or volume/ capacity ratio standard as applicable under the Planning Board's LATR Guidelines, or, if traffic exceeds the applicable standard, that the applicant demonstrate an ability to mitigate such adverse impacts; and*
   f. *when applying a non-Residential Floating zone to a property previously under a Residential Detached zone, not adversely affect the character of the surrounding neighborhood."*

First, I recommend item 2a. instead read as "generally conform with the recommendations…", which can provide slightly more flexibility in interpretation, given the potential for master plans to be significantly out of date. In addition, "substantial conformity" is the language used in site plan approval.

Item 2c. can be amended to remove reference to the Hearing Examiner, should OZAH no longer be involved in the approval process.

Next, I propose removing item 2e. entirely, as traffic studies are required during site plan review and adequate public facilities are a necessary finding for approval in that later process. As a reminder, an LMA grants zoning only, it does not guarantee approval of development.

Finally, I also propose removing item 2f. This verbiage is also found within the necessary findings for site plan approval in 7.3.4.D of the County Zoning Code. As above, zoning as a category should encompass a broader range of possibilities than site planning, and subjecting the zoning application to this level of scrutiny is unreasonable, particularly when only a single parcel is involved. Furthermore, a determination of "character" in the context of a neighborhood is highly subjective, as are the precise extents of what constitutes a neighborhood.

Development Standards

Finally, I will address the development standards in floating zones – what can eventually be built once a parcel receives its new zoning.

As mentioned earlier, the acreage requirement for additional density or FAR is quite high, particularly in residential floating zones. Various experts interviewed for this report indicated that the high land requirements (and by proxy, cost) precluded almost all residential floating zones from being useful, as large, cheap greenfield parcels are vanishingly rare in Montgomery County. In addition, density itself does not predict building form and may not correspond to public concerns surrounding height and mass of development.

C/R, E and I floating zones also tend to require larger lots to intensify development beyond FAR levels that already exist in many more urbanized areas of the county. For example, downtown Bethesda generally allows preexisting C/R FARs between 5.0 and 8.0, downtown Silver Spring between 3.0 and 8.0, and downtown Wheaton between 2.0 and 6.0. The most intense floating zone (CRF) requires 3 acres of land or more to achieve the same FAR already permitted in Silver Spring and Bethesda. Given that additional, complementary development would likely occur adjacent to these downtown areas, is it feasible to require developers to purchase exceedingly large quantities of land to emulate what is already built?

For residential floating zones, I propose altering the regulatory mechanism to floor-are ratio (FAR) rather than unit density per acre. Because FAR dynamically adjusts to lot size, the same FAR can be applied to a range of residential zones, regardless of minimum lot size within that zone. FAR allows development additional flexibility in unit configuration and unit mix, while still setting limits on overall building volume. FAR is equally applicable

to detached, attached, and multifamily structures. This change may even allow developers to be more responsive to community feedback during site plan review, as it permits them to shift unit counts, sizes, and placements without imperiling the overall development.

Though existing base residential zones are not regulated by FAR, we can determine a theoretical maximum based on minimum lot size, maximum lot coverage, and height, using the following formula:

*(Minimum Lot Size *Lot Coverage Ratio * Height in Stories)/Minimum Lot Size = FAR*

Simplified to:

*Lot Coverage Ratio * Height in Stories = FAR*

` For example, in an R-90 zone, the minimum lot size is 9,000 sq ft. The lot coverage ratio is 0.3, and the height in stories is 2.5 (although 3 is technically possible at a maximum height of 35 feet for a flat roof, this is rarely done). Thus, the assumed maximum by-right FAR for a structure in an R-90 zone is 0.75. Due to the zone's use standards, this will be a single-family detached home.

Recently, the council passed ZTA 25-02, Workforce Housing – Development Standards, which legalized some multifamily structures in R-40, R-60, R-90 and R-200 zones along certain corridors. These developments have a maximum allowable FAR of 1.25, which could serve as a logical maximum for residential floating zones as well. For other zones, I propose a modest increase in allowable FAR for floating zones to generate potential for redevelopment. A summary of the proposed FAR regulations are as follows:

Maximum FAR permitted – Residential Floating Zones (RDF, TF, AF)

Pre-existing Euclidian Zone	Base Minimum Lot Size/Site Size	Base Density (units/acre)	Theoretical Base Zone FAR	Floating Zone FAR Permitted
RE-2, RE-2C	2 acres	0.5	0.75	1.0
RE-1	40,000 SF	1.09	0.45	0.75
R-200	20,000 SF	2.18	0.625	1.25
R-90	9,000 SF	4.84	0.75	1.25
R-60	6,000 SF	7.26	0.75	1.25
R-40	4,000 SF	10.89	0.75	1.25
TLD	20,000 SF	9.0	1.4	2.0
TMD	20,000 SF	12	1.4	2.0
THD	40,000 SF	15	1.4	2.0

The three residential multifamily zones (R-30, R-20, and R-10) are regulated slightly differently. Our theoretical base FAR is derived from the allowed density in units/acre, multiplied by the average size per unit, then divided by the minimum lot size for apartment buildings.

Zone	Base Minimum Lot Size	Allowed Units/Acre	Estimated size per unit (sq ft.)	Theoretical Base FAR	Floating Zone FAR Permitted
R-30	12,000 SF	14.5	1,250 SF	1.5	2.0
R-20	16,000 SF	21.7	1,250 SF	1.7	2.25
R-10	20,000 SF	43.5	1,050 SF	2.3	3.0

Figure 8: Cottages on Greene, East Greenwich, RI. Designed by Union Architecture. Photo by Nat Rea

Consider a 9,000-square foot lot in an R-90 zone. With the existing floating zone regime, no additional housing may be constructed on the lot via rezoning, so no infill development would occur. In an FAR-based system, a developer can, after rezoning, construct their now-11,250 square feet of total building volume in whatever configuration they wish. In an RDF zone, this could take the form of nine 1,250-square foot detached small homes in a configuration sometimes referred to as the cottage or bungalow court.

Such homes could be constructed as for-sale, fee-simple units for much lower prices than existing new-build single-family homes. The precise number of units and size would likely be further constrained by permeable surface requirements for stormwater management and off-street parking, as well as negotiated setbacks. TF and AF zones would permit even more flexibility in multifamily construction, opening the door to more varied, inexpensive, but still low-profile, housing typologies. As the floating zone subcategories are retained, there is still a general expectation of certain development patterns based upon the use restrictions of each zone.

Projects of this type would still have to contend with subdivision regulations, which are not contemplated as part of this report but may need to be reformed as well.

Next, I will address non-residential floating zones. I recommend the existing FAR limits simply apply at smaller lot sizes. This change does not raise the highest FAR permitted in a floating zone but does allow more lots to be eligible for higher FARs in theory. In practice, floating zone applicants will still request a specific FAR and height to align with their planned project, which will have to generally conform with the applicable master plan and scale appropriately to surrounding development. The numbers below represent a maximum only.

Maximum FAR permitted – CR, E and I Floating Zones

Pre-Existing Euclidian Zone	Up to 0.25 acres	0.25 – 1 acre	1-3 acres	3+ acres
RE-2, RE-2C, RE-1, R-200	0.75 FAR	1 FAR	1.0 FAR	2.5 FAR
R-90, R-60, R-40, TLD, TMD, THD	1.0 FAR	1.5 FAR	2 FAR	2.5 FAR
CRN, CRT, CR	3 FAR	5 FAR	6 FAR	8 FAR
Employment	2 FAR	3 FAR	4 FAR	4 FAR
IL, IM	2 FAR	3 FAR	4 FAR	4 FAR

I also propose, rather than forcing applicants to select two separate residential and commercial FAR limits which together sum to the maximum permitted, as is currently done, that the total FAR permitted be equalized between the uses. Applicants should be permitted to adjust the balance of uses during the design phase to best meet market conditions, public benefit requests, or other factors. Thus, instead of a CRN floating zone with a total FAR of 6 being restricted to C-2 and R-4 during zoning approval, the total FAR of 6 remains but development can shift anywhere within that total allowable floor area.

Finally, I suggest parking minimums be eliminated for floating zone applications. Given the site-specific nature of floating zones, it is more logical to defer requirements and negotiations surrounding off-street parking to site plan approval, rather than the zone itself. As Donald Shoupe finds in his seminal 2005 book The High Cost of Free Parking, parking minimums impose substantial costs on both residential and commercial development and are rarely derived from empirical study of actual parking demand.

RESJ Impacts

Given that streamlined and improved floating zones could enable a broad variety of development patterns, and in many different regions of the county, it is difficult to estimate the precise impacts of such a change on marginalized communities. The additional capacity for residential infill development could produce lower-cost housing opportunities in existing high-cost neighborhoods. Property owners interested in redevelopment would stand to gain from higher sale prices, which would benefit owners, but could displace renters. Furthermore, affordability requirements are not considered as an element of this report but would substantially affect the RESJ implications of any development.

Non-residential infill opportunities in lower-cost areas could bolster access to jobs and commerce, but could also present conflicts between existing small businesses and commercial redevelopment. Mixed-use development in such areas can promote walkability, but car-centric commercial infill can instead present public health hazards to nearby residents. Ultimately, whether a rezoning promotes or hinders racial equity and social justice will depend on the specifics of that rezoning.

Conclusion

Questions surrounding the ease of use and flexibility of floating zones speak to several salient issues in modern North American urban planning. How do we strike a balance between participatory planning and responsiveness in land use? To what extent do we desire our communities to evolve over time? It is ultimately the role of elected officials and the democratic process to express the values and visions of governance that would answer these important questions. This report can only provide guidance.

The mere existence of floating zones suggests that Montgomery County has recognized some need for adaptability, but has not yet enacted the necessary reforms to promote such adaptation. In the words of Montgomery County's General Plan*:*

"Today the combination of rapid social, environmental, technological, demographic, and economic shifts at the national and global levels along with our new context requires us to take a clear-eyed look at our strengths and weaknesses. We have tremendous assets, but if we hope to continue to thrive, we must be prepared to make difficult decisions and take bold steps to prepare for the future."

Sources

Chapter 59 Montgomery County Zoning Ordinance. (n.d.). American Legal Publishing. https://codelibrary.amlegal.com/codes/montgomerycounty/latest/montgomeryco_md_zone2014/0-0-0-1

Einstein, K. L., Glick, D. M., & Palmer, M. (2020). *Neighborhood defenders: Participatory politics and America's housing crisis*. Cambridge University Press.

Howard County Charter and Code. (n.d.). *Zoning map Amendment process*. https://www.howardcountymd.gov/sites/default/files/media/2016-02/Zoning%20Map%20Amendment%20Process.pdf

Manville, M., Monkkonen, P., Gray, N., & Phillips, S. (2022). Does Discretion Delay Development? The Impact of Approval Pathways on Multifamily Housing's Time to Permit. *Journal of the American Planning Association*, *89*(3), 336–347. https://doi.org/10.1080/01944363.2022.2106291\

The Maryland-National Capital Park and Planning Commission. (2020). Forest Glen Montgomery Hills Sector Plan. In *Forest Glen Montgomery Hills Sector Plan*. https://montgomeryplanning.org/planning/communities/area-1/forest-glen-montgomery-hills-sector-plan

The Maryland-National Capital Park and Planning Commission. (2023). Thrive Montgomery 2050. In *Thrive Montgomery 2050*. https://montgomeryplanning.org/wp-content/uploads/2023/06/THRIVE-Approved-Adopted-Final.pdf

Lukavec, M., Čáp, V., & Čermáková, K. (2024). How permitting process length influences development costs and real estate prices. *Economics and Environment*, *89*(2), 768. https://doi.org/10.34659/eis.2024.89.2.768

Shoup, D. C. (2005). *The high cost of free parking*. https://escholarship.org/content/qt4vz087cc/qt4vz087cc.pdf?t=lpmcp0

Zoning Ordinance, Subdivision Regulations, & Landscape Manual (Effective 4/1/2022). Prince George's County. (n.d.). https://online.encodeplus.com/regs/princegeorgescounty-md/doc-viewer.aspx#secid-605