

I am Abbe Milstein, Planning and Zoning Chair for the Luxmanor Citizens Association. Our community represents almost 900 households in Luxmanor Windermere and the Oaks. Many streets, especially ones along the proposed “corridor of development”, were initially created in the 1930’s.

Luxmanor is bounded by Executive Boulevard, Old Georgetown Road and I-495. In 2021, Hurricane Ida resulted in an extraordinary amount of water falling within our community and the resulting damage costs to property were in the millions. Had anyone (person or pet) been in their basement at the time of the storm, the force of the water entering those homes would have been deadly. As a result of this incident the US Army Corps of Engineers is conducting ongoing hydrologic and hydraulic studies. FEMA flood zone maps are being readdressed as a result of this event.

Seven properties have been identified along Old Georgetown Road with potential to be workforce housing sites under ZTA 25-02. We anticipate several vacant buildings along Executive will be opportunities for conversion to workforce housing under ZTA-25-03. We thank the Housing staff for assisting with our comprehension of this complex package.

ZTA 25-02 is problematic for property owners who currently reside alongside these proposed properties for additional density development. Climate Adaptation Development Standards are not addressed in the ZTA. There are no standards for three and four unit multiplex buildings in the currently proposed ZTA 25-02. We concur with planning staff recommendations for code changes, ZTA changes or other enforceable mechanisms that will require control of stormwater runoff. We also concur with planning staff that more stringent standards are needed to support the CAP. Our community lives constantly with the damaging effect of stormwater runoff. Our WSSC transmission infrastructure is continuously breaching, creating the potential for severe underground implosions of the transmission lines.

Stormwater management waivers must also be banned. We concur with planning staff recommendations to assess the potential need for code

changes, ZTA changes or other enforceable mechanism as appropriate to develop NEW, more stringent standards regarding stormwater management for this type of development to support the rationale underlying the CAP. Doing so would go a long way in mitigating stormwater quantity, flooding, and water quality negative impacts that would otherwise result from ZTA 25-02.

Tree Canopy regulations must be retained. Under the CAP Carbon Sequestration Action S-2: Retain and Increase Tree Canopy - applicants who trigger this law prefer to pay the off-site fee rather than replace the trees they have removed on the site as a result of their development. Reduction of tree canopy provisions as currently outlined in this ZTA are highly problematic for a community that is already flood-prone. We agree with staff suggestions for code changes, ZTA changes, or other enforceable mechanisms to reduce tree spacing in the right-of-way and reduce the open area requirements on private lots to lessen the tree canopy loss.

Our neighborhood is made up of narrow streets which date back to the 1930's construction standards. Currently, both Tilden Middle School AND Luxmanor Elementary School are located along these streets resulting in parking challenges for events and massive traffic backups during school hours. We understand the logic in the staff reduction of parking spots from 2 to 1 to assist in stormwater management for impervious surfaces, however, this reduction in parking will only contribute to more parking congestion in the neighborhood on antiquated streets.

These ZTA's are lacking in provisions to address traffic. Old Georgetown road has failed intersections alongside our community and the newly built Woodward High School, located across the street from the proposed "blue zones for workforce housing development". Recently added bike lanes along Old Georgetown road have added to confusion and congestion and have constructively REMOVED a lane of traffic from Old Georgetown Road, thereby putting into question the idea that this road is a 3-lane

highway for purposes of the proposed “workforce corridor”. The plots identified for workforce housing are opposite the new Woodward High School. To add another layer of concern, the proposed BRT route (which will effectively take away ANOTHER land of traffic on Old Georgetown Road) will reduce the notion of a 3-lane roadway in front of the proposed land development for workforce housing. We are trying to get our minds around how all of these curb cuts, and additional residents will be able to utilize Old Georgetown Road for travel.

Infrastructure issues must be addressed in the proposed ZTA’s. WSSC infrastructure is dilapidated and needs to be replaced to support all of this development. In our community, we have endured multiple pipe failures in the two WSSC transmission pipes located under the ground along Tilden Lane (where now both Luxmanor and Tilden schools reside). These WSSC redundant transmission pipes, which are both larger than a car, are in extreme failure as denoted by WSSC and have required emergency patch work, resulting in the shutting down of Tilden Lane and surrounding streets in an effort to contain potentially catastrophic damage to schools and homes in the community. In recent years, the WSSC black water (raw sewer) pipes that are located along the Old Farm Creek (behind Executive Blvd, many private homes in our community and Luxmanor Elementary School) have leached raw sewage into our creek throughout the community due to ongoing stormwater mismanagement by the properties along Executive Blvd. The health and safety of our neighborhood school children and residents has been undermined by this situation. Both ZTA 02 and 03 must have amendments that proactively address infrastructure prior to allowing any additional development to occur.

Please consider a ZTA 25-03 amendment that requires a converted office building to address school capacity when a feeder school in the cluster is at 85 percent. Coordination between MCPS and Planning is critical in communities with overcrowded schools.