

## **SECTION 3 OF THE VILLAGE OF CHEVY CHASE**

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March 10, 2025

Dear Montgomery County Councilmembers:

We are seeking clarification on many aspects of ZTA 25-02. **The Section 3 Council supports efforts to provide workforce housing in our community while honoring our municipality's building codes.** But the compressed timeframe to review the ZTA, the map and the Planning Board staff report and provide testimony has not afforded us the opportunity to hold a public hearing and take an official position on the pending legislation. Therefore, we respectfully submit the following questions to better understand the ZTA.

***Why does the ZTA allow for duplex housing?*** With the focus on workforce housing, we don't understand why the ZTA provides for duplex housing *without* any workforce housing requirement. We question if developers will even consider the provisions of the ZTA to offer multi-family housing requiring 15% workforce housing when they have an unencumbered market rate duplex option. ***Why include any housing that does not include workforce housing requirements?***

***Why does the ZTA allow for ancillary uses?*** Allowing ancillary uses is at odds with increasing workforce housing. Any space dedicated to ancillary uses cuts into the ability to offer workforce housing and potentially presents serious parking issues.

***How would the ZTA right-size new housing in practice?*** The proposed ZTA clarifies the minimum square footage for an individual lot to build multifamily housing (in our case, that would be 6,000 sq. ft) but it does not state the minimum square footage per unit for the workforce housing. If this is truly to be workforce housing, shouldn't there be a way to define the minimum square footage for those units so that we don't end up with 'less than' housing in the form of a token below grade studio apartments?

***If the point of the legislation is to provide house-scale housing that provides workforce housing, why are there no restrictions on chaining multiple lots?***

***Since this housing provides for the Optional Method, why not have the optional method standards match the standard method development to achieve neighborhood-compatible additional housing?***

***Why doesn't the ZTA explicitly address what might happen to the workforce housing units in the event of a foreclosure or bankruptcy and extended the workforce housing restrictions to the state standard of 40 years not 20?***

***Why not add height compatibility standards as a requirement (Section 3.2.8.B of the zoning code) to assure house-scale structures?***

***Does the ZTA allow for short-term rentals?*** If not clarified, short-term rentals could flourish at the expense of workforce housing.

***Why does the planning staff recommend decreasing parking requirements while increasing density?*** The planning staff report proposes on-site parking requirements which would necessitate that residents of this new housing park on nearby side streets. Such a solution is not tenable. On-street parking is rarely permitted on the designated corridors.

For example, in Section 3, we have 282 homes and a Church with an attached pre-school. The State Highway Administration tells us we have 600 cars registered to residents in those 282 homes. Further complicating the issue is that we have 16' wide streets with one side only on-street parking.

We do not have the capacity to provide parking for additional units of housing on side streets. Many of the corridors listed are State Highways. When you want a curb cut on a state highway, you have to apply to the State. They want to minimize driveways opening onto nearby intersections to avoid potential accidents. Why would you limit the number of required on-site parking spaces given the paucity of other options?

***Why doesn't the ZTA limit driveway access to the existing driveways at each parcel with access to the corridor?*** Section 3 includes many properties with shared driveways, including three shared driveways for properties designated in ZTA 25-02. One of those driveways is so narrow that a pick-up truck cannot make the turn into the driveway. Two of the houses sharing the driveway have 55' foot wide lots set about 4' above grade. ***How would the ZTA address this problem?***

***How does the ZTA address stormwater considerations in densely populated communities such as Section 3?*** It appears the ZTA prioritizes limiting driveway concrete over adopting a development standard for either minimal strips of concrete to provide maximum drainage for driveways, or pervious less costly solutions like pea gravel. Waivers for stormwater management should be prohibited as smaller lots are more likely to be developed first and more caution is required in terms of stormwater management.

In addition, removing site plan requirements has an outsized impact on smaller lots. These lots, which are more affordable, are attractive for redevelopment, but are in the most need of right-sizing for lot coverage and building height.

***What are the guard rails to ensure developers follow the ZTA intent faithfully?*** It is unclear if the ZTA would require impact taxes or whether there would be incentives for developers who exceed the 15% workforce housing minimums.

***Why not list all eligible properties in an appendix so there is no confusion about which lots are included in the ZTA?***

Thank you for considering these questions. We look forward to continued dialogue as the legislation moves through the process.