

## Joint Municipal Letter on SRA 25-02

Chevy Chase Village, Section 3 of the Village of Chevy Chase, Section 5 of the Village of Chevy Chase, Town of Chevy Chase, Town of Chevy Chase View, Village of Martin's Addition, Village of North Chevy Chase

September 15, 2025

Montgomery County Council  
100 Maryland Avenue  
Rockville, MD 20850

### **Re: Testimony on SRA 25-02 -- Workforce Housing Development and Compatibility with Surrounding Neighborhoods**

Dear Council President Stewart and County Council Members:

On behalf of the undersigned municipalities, we thank you for the opportunity to provide testimony on Subdivision Regulation Amendment (SRA) 25-02. Our communities support the County's goals of advancing workforce housing, broadening housing opportunities, diversifying the housing stock, and creating more inclusive neighborhoods. At the same time, it is essential that new multifamily development be thoughtfully integrated so that it respects the scale of adjacent single-family homes.

We are concerned that the current draft of SRA 25-02, which proposes a three-lot consolidation limit, relies on a metric that does not account for the wide variation in lot sizes across down-county neighborhoods. Despite the 6,000 square foot standard lot size in R-60, individual lot sizes in these communities actually range from less than 6,000 square feet to more than 20,000 square feet. While consolidating small lots may be appropriate to create opportunities for workforce housing, allowing consolidation of large lots could lead to massing that would be overwhelming in scale to the neighboring single-family homes.

To address this, we recommend defining consolidation limits by total lot area rather than by the number of lots. Specifically, consolidation should not be permitted if the resulting parcel exceeds three times the minimum lot size of the underlying residential zone. For example, in an R-60 neighborhood, the maximum allowable consolidated parcel would be 18,000 square feet.

This balanced approach provides opportunities for a developer to assemble small lots into a parcel of ample size to construct workforce housing and is consistent with renderings presented by the Planning Department of such housing on consolidated 12,000 and 18,000 square foot lots. Yet, it also prevents excessive scale in areas that have existing large lots where even a single lot is of sufficient size to support workforce housing.

Our second concern relates to "front to back" consolidation, meaning the ability to combine corridor-facing lots with interior lots on neighborhood streets. While the draft language indirectly prohibits this by limiting consolidation to "eligible" lots, we believe the prohibition should be explicitly stated. For clarity and assurance, we request that the SRA be amended to specify that eligible and ineligible lots may not be combined and that only lots fronting on an Applicable Corridor as of November 1, 2025, qualify as eligible.

Lastly, we propose a minor clarification to the Planning Department's recommended amendments. Specifically, while the Planning Board may be granted flexibility to create flag lots or "through" lots, this authority should not be interpreted as allowing the waiver of other zoning provisions (e.g., setback standards). With this clarification, we do not object to the Planning Department's recommendations.

For completeness, we have included in the attachment a series of technical amendments that integrate both the Planning Department Staff's recommendations and our own.

We believe these amendments strike an appropriate balance between expanding workforce housing opportunities while ensuring new development fits contextually within adjacent single-family neighborhoods. By setting clear limits on consolidated lot size and limiting eligibility to qualified lots as of a certain date, the County can provide predictability for residents, foster context-sensitive growth, and reinforce its broader planning goals.

Thank you for your leadership on this important issue. We look forward to working with you to advance workforce housing solutions that strengthen the County while preserving the scale, sense of place, and fabric of our communities.

Respectfully submitted,

Elissa A. Leonard  
Chair, Board of Managers, Chevy Chase Village

Susan Manning  
Chair, Village Council, Section 3 of the Village of Chevy Chase

Greg Chernack  
Chair, Village Council, Section 5 of the Village of Chevy Chase

Barney Rush  
Mayor, Town Council, Town of Chevy Chase

Ed Tarbutton  
Chair, Town Council, Town of Chevy Chase View

Arthur Alexander  
Chair, Village Council, Village of Martin's Additions

Adrian Andreassi  
Chair, Village Council, Village of North Chevy Chase

## Appendix – Proposed Technical Amendment to SRA 25-02

With Planning Department Staff's and undersigned municipal recommendations:

g. Optional method Workforce Housing Development.

- i. Notwithstanding any provisions of Section 4.3.C.1. to the contrary, for a lot or lots created for optional method Workforce Housing Development under Section 59-4.4.2.C:
  - (a) the Board must not approve ~~flag lots, lots that do not abut a public or private road,~~  
~~or~~ through lots; ~~and~~
  - (b) the Board must not approve flag lots, or lots that do not abut a public or private road, if the lots would be approved for a duplex, triplex, townhouse, or apartment building type to be located behind a detached house addressed on the same road;
  - (c) the Board may approve flag lots, or lots that do not abut a public or private road, without making the findings of Section 4.3.C.1.b or Section 4.3.C.1.c except any building restriction lines no less than required by the underlying zone and determined necessary by the Board must be shown on the plat, and access to each lot must be adequate to serve the lots for emergency vehicles and for the installation of public utilities;
  - (d) the Board must not approve the an assemblage of ~~more than 3~~ eligible lots, ~~under Section 59-4.4.2.C~~ that results in a new lot comprising more than 3 times the minimum lot area for the respective zone; and
  - (e) the Board must not approve the assemblage of any eligible lot with any ineligible lot.
- ii. For purposes of this subparagraph g. "eligible lot" is defined as a lot with a front lot line that abuts an Applicable Corridor under Section 59-4.4.2.C. as of November 1, 2025.