

September 15, 2025

Montgomery County Council  
100 Maryland Avenue, 6th Floor  
Rockville, MD 20850

Dear Councilmembers Friedson, Fani-González, Jawando, Stewart, Alborno, Balcombe, Glass, Katz, Luedtke, Mink, and Sayles:

The Wildwood Manor Citizens Association (WMCA) appreciates the opportunity to submit these comments on Subdivision Regulation Amendment (SRA) 25-02, Technical Review – Optional Method Workforce Housing (OMWH) Development.<sup>1</sup> WMCA represents more than 500 Bethesda homes located just east of MD 187 (Old Georgetown Road) and bordered by I-270 on the North, Snow Point Drive on the East, and Grosvenor Lane and Southport Drive on the South.

As we previously testified on ZTA 25-02,<sup>2</sup> WMCA is very concerned about the County Council's bypassing of the Master and Sector Planning processes and the negative impact of increased population density along the County's corridor roads on the environment, schools, infrastructure, transportation, stormwater management, public safety, and adequate public facilities and services. SRA 25-02 is critical to limiting these negative impacts on our communities.

Our specific comments on SRA 25-02 appear below:

WMCA Supports the Complete Prohibition of Flag Lots, Through Lots, and Lots that Do Not Abut a Public or Private Road

**WMCA urges the County Council to amend SRA 25-02 to completely prohibit the creation of flag lots, through lots, and lots that do not abut a public or private road.**<sup>3</sup> As currently written, SRA 25-02 includes loopholes that would allow the Planning Board to approve such lots. This is completely contrary to the legislative intent of ZTA 25-02 and Councilmembers' repeated statements to the public about the scope of ZTA 25-02.

---

<sup>1</sup> Montgomery County Council. Staff Report AGENDA ITEM #7C. (2025, July 22). Subdivision Regulation Amendment (SRA) 25-02, Technical Review – Optional Method Workforce Housing Development. Available at: [https://www.montgomerycountymd.gov/COUNCIL/Resources/Files/20250722\\_7C.pdf](https://www.montgomerycountymd.gov/COUNCIL/Resources/Files/20250722_7C.pdf) (hereinafter "SRA 25-02 Staff Report").

<sup>2</sup> Wildwood Manor Citizens Association (WMCA). (2025, June 22). WMCA ZTA 25-02 Comments.

<sup>3</sup> Montgomery County Planning Board. MCPB Item No. 8. (2025, September 4). SRA 25-02, TECHNICAL REVIEW – OPTIONAL METHOD WORKFORCE HOUSING DEVELOPMENT, p. 4. Available at: <https://montgomeryplanningboard.org/wp-content/uploads/2025/08/SR-SRA-25-02-OMWH.pdf>. See Figure 1 for a visual example of flag lot, through lot, and lot that does not abut a road.

Councilmember Friedson could not have been clearer in his direction that SRA 25-02 prohibit flag lots and through lots. In his June 18, 2025 request for a SRA to accompany ZTA 25-02, Friedson stated: “There has been significant confusion as to whether through lots and flag lots qualify under ZTA 25-02.<sup>4</sup> **As I have shared numerous times with residents, inclusion of such lots was not the legislative intent of ZTA 25-02 as introduced and should be prohibited. We need to make this clear to the public and to property owners who may be interested in redeveloping** (emphasis added).”<sup>5</sup>

In order to keep the Council’s promise to the public, SRA 25-02 needs to completely prohibit the creation of flag lots, through lots, and lots that do not abut a public or private road. These prohibitions are critical to effectuating the legislative intent of ZTA 25-02 to prevent the incursion of new OMWH developments into the interior of residential neighborhoods and ensure that the scale of OMWH developments will remain compatible with their surrounding neighborhood.

#### WMCA Supports Limiting Lot Consolidation under SRA 25-02 and Imposing a Square Footage Cap related to Underlying Zoning

**WMCA urges the Council to prohibit lot consolidation under SRA 25-02** in order to limit the negative impacts on the environment, schools, infrastructure, transportation, stormwater management, and other public facilities and services. **If lot consolidation is allowed under SRA 25-02, it should be limited to no more than 2 consecutive eligible parcels.**

Given the existence of many significantly large lots throughout the County, WMCA also urges the Council to include a provision in SRA 25-02 limiting the size of the OMWH development that can be built on any consolidated lots. As Councilmember Friedson said, in order “to balance realistic opportunities for redevelopment with potential impacts to neighboring properties,”<sup>6</sup> WMCA joins with other citizens associations in recommending that SRA 25-02 limit the size of new OMWH developments that can be built on consolidated lots to twice the square footage minimum for the applicable residential zone (i.e., for R-60, the total square footage of any two-lot consolidation should be no greater than 12,000 sq. ft.; for R-90, the total square footage of any two-lot consolidation should be no greater than 18,000 sq. ft., etc.). In addition, the Council should limit maximum lot coverage for any OMWH development to the limits for single family homes. This will help to reduce negative impacts to the surrounding community.

---

<sup>4</sup> SRA 25-02 Staff Report at pp. 9-10.

<sup>5</sup> Id. at p. 9.

<sup>6</sup> Id. at p. 10.

## Conclusion

To be consistent with legislative intent and promises to the public, WMCA urges the Council to amend SRA 25-02 to completely prohibit the creation of flag lots, through lots, and lots that do not abut a public or private road. In addition, WMCA urges the Council to prohibit lot consolidation under SRA 25-02. If lot consolidation is allowed, it should be limited to no more than 2 consecutive eligible parcels and there should also be specific square footage limits on the size of OMWH developments that can be built on any consolidated lots. In addition, SRA 25-02 should limit maximum lot coverage for any OMWH development to the limits for single family homes. This will help to reduce negative impacts to the surrounding community.

WMCA continues to urge the Council to consider and pursue other effective ways to address the need for workforce and affordable housing that do not involve the elimination of single-family zoning. Thank you for your consideration of our concerns and recommendations. If you have any questions or would like to follow-up with us about our comments, please contact me at [kbolte6008@gmail.com](mailto:kbolte6008@gmail.com).

Sincerely,

*Karin Bolte*

Karin Bolte, President  
Wildwood Manor Citizens Association

6008 Chatsworth Lane  
Bethesda, MD 20814-2206  
(301) 648-0673  
[Kbolte6008@gmail.com](mailto:Kbolte6008@gmail.com)

Cc: Arlet Koseian-Beckham, Vice President, WMCA  
Marie Wierzbic, Secretary, WMCA  
Tim Taylor, Treasurer, WMCA  
Ann Bowker, past Co-Chair, Development Committee, WMCA  
County Executive Marc Elrich