



To,
The Montgomery County Council
100 Maryland Avenue
Rockville, MD

February 15, 2021

Reg: Zoning Text Amendment 20-07

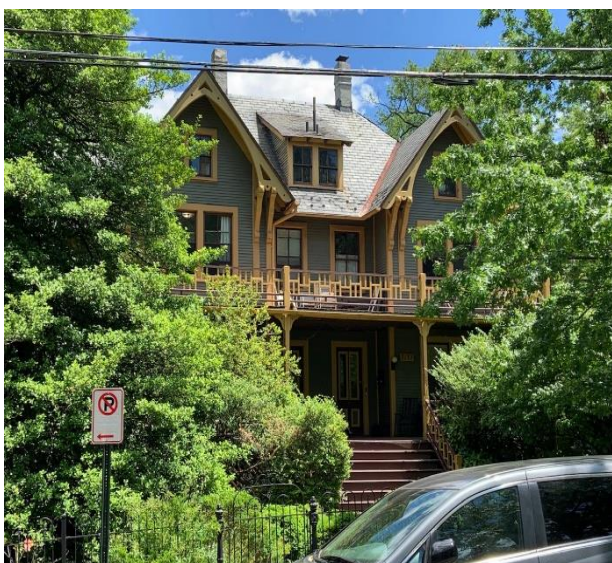
Dear Council President Hucker and Members of the Montgomery County Council.

I am Shruti Bhatnagar, Chair of the Montgomery County Sierra Club. I am writing today on behalf of nearly 6000 Sierra Club members in the county.

We are pleased to *enthusiastically support efforts to provide more Missing Middle housing* in the county! Sierra Club's top priorities are to *address climate change* and to *address racial justice and equity*. We understand that these two goals are intertwined.

As Sierra Club sees it, a critical route to achieving these two goals is a bold and thoughtful approach to producing more housing in the county. In short, Montgomery County needs to produce *more housing*, with an emphasis on *affordable housing* and an emphasis on housing that's *walking distance to transit*. And, we especially need to focus on *affordable housing that's located near transit*.

ZTA 20-07 will permit Missing Middle housing in many county neighborhoods where it is now prohibited. We want to emphasize that Missing Middle housing is *not a new idea*. A few months ago, Sierra Club held a Zoom public forum where we presented examples of dozens of Missing Middle units currently located harmoniously in the county in predominantly single-family neighborhoods.



Let me address the concerns of those who fear sudden and dramatic changes in their neighborhoods. Several US jurisdictions have opened up the option for more Missing Middle housing in recent years. In places like Minneapolis and Portland (OR), the creation of new duplexes and other Missing Middle housing has been *slow and gradual*.

We also want to emphasize that under current law, redevelopment of a single-family lot is permitted. The problem is – today the *only choice is to replace the existing small house with one unit* (which, as we all have seen, is usually a substantially larger and more expensive home, often called a McMansion). This approach does *not* increase the housing supply and does *not* address the need for more affordable housing.

We believe that the *specific details* of ZTA 20-07 need to be discussed and take into consideration some amendments that improve the legislation and address some of the concerns. But we *enthusiastically endorse the Missing Middle framework* that this bill is built upon.

Furthermore, we align ourselves with the Planning Board’s February 10, 2021 recommendations that ZTA 20-07 be enhanced so that it has a better chance of achieving the goal of providing a greater diversity of housing options in close proximity to public transit. We want to emphasize especially our support for a) the expansion of housing types to include triplexes and quadraplexes; and b) the call for parking minimums to be completely removed.

We agree with the Planning Board on these points --

- the scope of the ZTA should be expanded to include the R-40 and R-90 zones to increase the likelihood of obtaining the desired outcome of new Missing Middle housing within one mile of transit stations;
- the ZTA should be expanded to include properties around Purple Line stations, current and planned BRT stations, and MARC stations;
- additional analysis should be conducted to consider modifications to development standards, building height, lot size and setbacks, to ensure a meaningful increase in Missing Middle housing in these areas near transit stations;
- the ZTA should be expanded to include additional residential use types, such as triplexes and quadraplexes, with appropriate development standards, to increase the variety of housing options available in the county;
- design should be integrated into the development review and approval process before the Council adopts this ZTA;
- parking minimums should be completely removed for new housing within one mile of Metrorail and other transit stations.

Thinking beyond a single ZTA is critical for success in moving forward on Missing Middle housing. As the Planning Board notes in their Feb 10 recommendations --

- the shortage of affordable housing is a crisis that must be addressed, and this ZTA is only a start in creating Missing Middle housing;
- if the county is to effectively move forward on this front, a *comprehensive and coordinated Missing Middle housing strategy must be developed*.

Founded in 1892, the Sierra Club is America’s oldest and largest grassroots environmental organization. The Montgomery County Sierra Club represents nearly 6000 members and supporters, and the Sierra Club Maryland has approximately 70,000 members.



In closing, Sierra Club *enthusiastically endorses the Missing Middle framework* that this bill is built upon. More Missing Middle housing will be *good for the planet* – and good for the county’s *quality of life*!

We urge the County Council to work with the Planning Board and community stakeholders to review the proposed amendments and pass legislation that will create more Missing Middle Housing in the County.

Sincerely,

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