



March 11, 2025
Montgomery County Council
100 Maryland Ave
Rockville, MD 20850

More Housing N.O.W. Package

ZTA 25-02, Workforce Housing - Development Standards

ZTA 25-03, Expedited Approvals - Commercial to Residential Reconstruction

SRA 25-01, Administrative Subdivision - Expedited Approval Plan

Expedited Bill 2-25, Taxation - Payments in Lieu of Taxes - Affordable Housing Amendments

Thank you for the opportunity to share testimony on behalf of the Coalition for Smarter Growth. CSG advocates for building walkable, bikeable, transit-oriented communities with housing all people can afford is the most sustainable and inclusive way for the D.C. metro region to grow.

I am writing to offer our support for the More Housing N.O.W. package, and to thank the sponsors for stepping up and showing Montgomery County is ready to do what is needed to address our housing crisis.

We can't afford to wait for housing action.

Montgomery County has a strong record of supporting subsidized affordable housing, including making historic commitments to funding for affordable housing these past few years.

We have not been innovators in the same way in making sure our county has homes that are affordable to our middle class, young people, older adults looking to downsize, and others who do not qualify for affordable housing—yet are increasingly unable to find market-rate homes they can afford amongst our limited housing options.

Our current zoning policies have severely restricted the number and variety of homes available near jobs and transit across our county. As a consequence, we are losing people who would like to live and work in this county yet must turn to other places where they can find housing they can afford.

- This trend **hurts our ability to attract and retain a strong workforce**, and sustain the robust tax base needed to offer critical services and programs.
- It is **making homeownership in Montgomery County an increasingly exclusive proposition**. Home prices across the county have been [rising faster than inflation](#) for



two decades, and [only households earning \\$150k or more](#) increased their rate of homeownership rates between 2010 and 2021 while rates of homeownership for all other income bands declined.

- This trend also **undercuts our climate goals** by forcing people who work in Montgomery County to live farther from their jobs and from convenient transit options—leading to longer commutes, greater pollution from vehicle emissions, and increased demand for sprawl development in other jurisdictions to fill the housing demand that our county is failing to meet.

More Housing N.O.W. offers promising new approaches to create the housing our county needs.

The proposals in the More Housing N.O.W. package will **help expand the supply and variety of housing types available near jobs and transit**—giving more people with a wider range of household sizes and needs the opportunity to live in Montgomery County.

Allowing a Greater Variety of Housing Types

CSG strongly supports the approach of building a wider variety of housing types in sustainable locations with access to transit and jobs, as proposed by **ZTA 25-02**.

- Detached single-family homes remain the most expensive housing option in the county. As of [February 2025](#), the median sale price for a detached single-family home in Montgomery County was \$835,000, while the median sale price for a townhouse was \$500,000, and \$279,000 for condos/co-ops.
- To make housing and homeownership affordable for more people, it follows that we need to offer more options that better align with people's varied incomes and needs.
- We support expanding housing choices to allow for duplexes, triplexes, and other small multi-family buildings that can accommodate more people and meet a wider range of housing needs than detached single-family homes alone.

Office-to-Residential Conversions

We also support efforts to facilitate office-to-residential conversions when feasible, as provided for by **ZTA 25-03**, **SRA 25-01**, and **Expedited Bill 2-25**.

- As work trends and housing needs shift, our land use policies need to keep up. These bills will provide greater flexibility to ensure parcels with underused office space can be adapted to best serve community needs.
- Office-to-residential conversions are often uniquely complex and costly due to the challenges of converting a building or site not previously designed for residential use to

meet residential standards. Offering support through a PILOT, as outlined in **Expedited Bill 2-25**, may help projects that are highly desirable and appropriate for a given site, yet may not otherwise be financially feasible, get across the finish line.

Additional recommendations

CSG supports the measures in the More Housing N.O.W. package, and thank its sponsors for standing with a broad and diverse coalition of Montgomery County organizations and individuals who recognize that we need bold action and new approaches to create the housing our county needs.

We also offer the following recommendations to even better achieve our shared goal of creating more affordable homes for all people in sustainable locations in Montgomery County.

ZTA 25-02. Workforce Housing - Development Standards

- **Include corner lots along included corridors:** We support this ZTA's intent of supporting corridor-focused growth, and note that some corner lots located on included corridors are currently excluded from this ZTA if their address is on a side street rather than on the corridor itself. For consistency, we recommend including these corner lots in the ZTA as well.
- **Support homes near transit:** This ZTA will help create more homes with access to jobs and economic opportunity. This benefit can be amplified by allowing a wider variety of homes near rail stations as well as on major county corridors.

We ask the Council to consider expanding the coverage of this ZTA to also apply to R-40, R-60, R-90, and R-200 lots in strategic locations near rail stations—particularly the Purple Line and MARC, excluding lots contained within the Agricultural Reserve.

Workforce Housing Opportunity Fund

- We support this proposed fund, and ask that the Council hold firm in its commitment to **allocating the \$4 million in proposed funding for the program as new funding** that is additive to the total funding in the HIF, not diverted from other HIF programs.

Additional Recommendations and Areas for Analysis

We raise the following as potential areas for additional analysis to make sure the policies in this package achieve their intended goals as effectively as possible. We strongly encourage the Council to turn to affordable housing organizations and the Montgomery Housing Alliance as a resource in considering these matters.

- **Building height:** In ZTA 25-02, are there sites where the 40 foot height limit may be more restrictive than what existing stepdown requirements addressing limits on building height would allow? Could modestly increasing this height limit to align with standards for existing examples of housing types like townhomes and small apartment buildings in the county allow for the production of additional homes?
- **Reducing costs to create workforce-level homes:** The amount of cost and uncertainty associated with development approval processes and requirements can make or break the feasibility of building a new housing project—especially those with subsidized affordable homes.

We recommend consulting with experienced affordable housing developers regarding the development review process and the targeting (both in terms of unit percentage and AMI) of income restrictions proposed in ZTA 25-02 in order to help identify the most strategic pathways to expeditiously producing workforce income-level homes.

Sincerely,

A handwritten signature in cursive script that reads "Carrie Kisicki".

Carrie Kisicki
Montgomery County Advocacy Manager