

MONTGOMERY COUNTY CIVIC FEDERATION, INC.

RESOLUTION

ATTAINABLE HOUSING STRATEGIES INITIATIVE

The Montgomery County Civic Federation, Inc. (MCCF), representing communities and individuals throughout Montgomery County, acknowledges the projected future growth in Montgomery County population, welcomes new residents, embraces diversity, and supports providing equitable housing opportunities (both home ownership and rental) to current and future generations of residents. The MCCF wishes to partner with the County to achieve these housing goals.

The Council of Governments (COG) projects that about 75% of new housing units will need to be affordable to low- and middle-income residents. (See *The Future of Housing in Greater Washington, Metropolitan Council of Governments, Sept 2019*) The Montgomery County Planning Board noted in 2024, that as of 2022, it was estimated that about one-third of MOCO four-person households had up to \$83,000/year in income (low-income) and this group was the only income group that grew between 2005 and 2022. (See *The Third Place » Repositioning Montgomery County for Prosperity, Part 1: Montgomery County's Income Shifts | Montgomery Planning*).

There are significant questions however about the reliability of data on housing needs, targets for new housing and populations to be served, as well as how much housing has been built in recent years. There are also significant questions about the current availability of zoned land for new housing, assumptions about transportation, questions about units in the pipeline that have not moved forward, and lack of a Racial Equity and Social Justice review. These discrepancies and questions about the data must be resolved before solutions can be found.

The Montgomery County Planning Board has approved and submitted to the County Council an Attainable Housing Strategies Initiative (AHSI) to address the County's current and anticipated housing needs. As currently drafted, AHSI is not intended to produce affordable housing, but, rather, only market-rate housing. Housing needs are concentrated among County residents of low to moderate income who cannot afford or are challenged to afford market-rate housing. This group includes, but is not limited, to young families, first-time home buyers, and essential workers in the County, including teachers, police, firefighters, and other valued public-sector-employees.

MCCF has determined that AHSI may result in unintended harm to many of the residential areas of the County. MCCF adopts the following preambles and resolutions:

WHEREAS, AHSI is designed to produce market-rate housing, which will not be affordable to those of low to moderate income-- where the need is greatest --and which in many areas may be more expensive to buyers than existing properties available in the market;

WHEREAS, AHSI is a sweeping proposal to upzone approximately 82% of Montgomery County's single-family detached neighborhoods for greater density, affecting substantially all County neighborhoods within the Beltway and much outside, but lacking in data or analysis supporting the need for the rezoning or evidence that the zoning changes would achieve their stated purposes;

WHEREAS, many Montgomery County residents remain unaware of the AHSI proposal or the potential impact of the proposal on their own homes or neighborhoods;

WHEREAS, Montgomery County’s Growth and Infrastructure Policy has not been sufficiently effective at identifying school and other growth-related infrastructure needs and because a growing number of County exemptions and state budget deficits have put the financing of infrastructure associated with growth at continuing risk;

WHEREAS, The Planning Board has proposed implementing AHSI as a County-wide Zoning Text Amendment (ZTA) outside of the Master Plan Process, minimizing resident participation and opportunity to be heard; and

WHEREAS, there is sufficient vacant land with residential zoning and a pipeline of tens of thousands of residential real estate approvals – approved by the Planning Board, with a majority being multi-family dwellings – capable of meeting projected market-rate housing needs, without upzoning.

NOW, THEREFORE, BE IT RESOLVED that MCCF calls on the County Council to suspend consideration of AHSI and the recommendations in their current form to focus on data driven proposals to provide housing to populations with the greatest need and minimize adverse impacts on low-and moderate-income residents and communities.

BE IT FURTHER RESOLVED that MCCF calls upon the County Council to instruct the Planning Board to provide independent third-party data and analyses quantifying or evaluating:

- (i) the extent to which the housing shortage impacts available supply and market prices for low-, middle-, and high-income residents;
- (ii) how much land in the County is available for residential development under current zoning;
- (iii) if there is a shortage of housing at market rate pricing, the extent to which the housing shortage can be adequately addressed under existing zoning; and
- (iv) what makes AHSI the best way to address that shortage, such analysis to include a comprehensive literature review and analysis of existing studies of the effectiveness of U.S. upzoning programs similar to **AHSI applied to suburban (not urban) areas similar to Montgomery County.**

BE IT FURTHER RESOLVED that MCCF calls upon the County Council, when moving forward on AHSI and any other significant proposal, to review a Racial Equity and Social Justice analysis and state publicly any area of disagreement with the analyses and its reasons for disagreement.

BE IT FURTHER RESOLVED that the MCCF calls upon the County Council to instruct the Planning Board that where upzoning and/or changes to existing zoning standards are proposed, Planning shall analyze potential increases in: traffic congestion, loss of available parking on neighborhood streets, both narrow and wide, many of which do not have driveways and/or lack adequate off-street parking, loss of naturally occurring affordable housing (NOAH),* and potential increases in investor, corporate, or private equity-owned housing.

BE IT FURTHER RESOLVED that MCCF calls upon the County Council to instruct the Planning Board to produce fiscal impact analyses of the AHSI proposal, including the costs of infrastructure, school construction, parking, road construction and maintenance, sidewalks, stormwater drainage, and other costs, as well as how the costs would be financed.

BE IT FURTHER RESOLVED that the MCCF calls upon the County Council to instruct the Planning Department to conduct relevant environmental impact studies, develop and deliver analyses and proposed tools to limit negative consequences including loss of mature tree canopy, increases in impermeable surfaces and stormwater runoff, and waivers and/or relaxation of stormwater management rules.

BE IT FURTHER RESOLVED that MCCF calls upon the County Council to instruct the Planning Board to follow the Master Plan processes for all zoning changes of the type presented in AHSI, and to maximize community review and feedback by ensuring every affected homeowner in Montgomery County is notified in writing at least 120 days before a public hearing on any proposal to change the zoning of their properties, the specifics of the proposed rezoning, and the specifics of any additional rezonings along the Thrive Montgomery 2050 designated Growth Corridors;

BE IT FURTHER RESOLVED that MCCF calls upon the County Council to instruct the Planning Board and other appropriate departments, working together, to refocus efforts on: a comprehensive plan to identify and address the County’s unmet housing needs, serving populations needing County assistance to obtain affordable housing, and producing a study with conclusions on the market and why the large number of approved units in the pipeline are not moving forward;

BE IT FURTHER RESOLVED that MCCF calls upon the County Council to instruct the Planning Board to consider alternative approaches to increase the supply of housing to low- and moderate-income residents including data to support how recommended approaches will address the County’s needs and suggested actions to limit unintended negative consequences including:

- increasing MPDUs
- working with faith-based institutions to promote affordable housing in accordance with the FAITH ZTA
- producing recommendations on the future use of vacant/available land,
- protecting NOAH
- providing home ownership opportunities and financial assistance
- targeted upzoning on known redevelopment sites
- converting underutilized commercial buildings for residential use
- investigation- and evidence-based strategies for properties with approved projects that are not proceeding
- increasing funds for the Housing Initiative Fund Program and Community Land Trusts,
- and increasing the focus on workforce housing

BE IT FURTHER RESOLVED that with any future residential zoning changes, new housing be distributed throughout the County, working through the master plan process, after meaningful engagement and consultation with residents, including the appointment of advisory commissions representing affected neighborhoods.

* According to the Planning Department’s glossary, naturally occurring affordable housing (NOAH) is “Market-rate residential units that are affordable to low and middle-income households without public subsidies. It generally refers to rental housing but can include ownership properties as well. In Montgomery County, it generally refers to units affordable to households at or below 80% of AMI.”

Approved this 4th day of November, 2024

Allen Bowser, Secretary