

**STATEMENT OF RICHARD LEVINE  
LOCUST HILL CITIZENS' ASSOCIATION**

**BEFORE THE MONTGOMERY COUNTY COUNCIL  
REGARDING ZONING TEXT AMENDMENT 20-07**

**FEBRUARY 11, 2021**

President Hucker, Chairman Riemer, and members of the Council. My name is Richard Levine and I am testifying on behalf of the Locust Hill Citizens' Association. Locust Hill is an R-60 single-family community bounded by Cedar Lane on the south, Rockville Pike on the west and the arc of the Beltway from Rockville Pike around to Cedar Lane on the north and east. Most relevantly for the purpose of this hearing, it is located 0.6 mile to 1.2 miles north of the Medical Center Metro station.

Locust Hill strongly opposes adoption of ZTA 20-07 because it assumes that all R-60 neighborhoods within a mile of a Metro station are fair game for the construction of "missing middle" housing. In so doing, it attempts to solve the missing middle housing problem without regard to the appropriateness of standard method town homes and small apartment buildings in a given community and does so without establishing design guideline that respect a community's architecture and heritage.

Instead, consideration of zoning changes addressing missing middle house should be part of a more holistic process, such as in the Thrive 2050 process, and permit community input with respect to neighborhoods to which such changes are applied. We note that the Planning Department's February 4 comments (at 2, 9-11) state that missing middle issues need to be integrated into a comprehensive and coordinated strategy and that, alone, ZTA 20-07 is unlikely to be effective in producing the desired housing outcomes.

We believe use of a one-mile radius is particularly inappropriate with respect to the "west leg" of the Red Line inside the Beltway. For example, the recently adopted Bethesda Central Business District Plan demarcates zones of development along and adjacent to Wisconsin Avenue with specified transitions to single family housing. It seems premature to modify those efforts for areas within one mile of the Bethesda station and south from Medical Center station. Further, multiple multifamily developments are already located just north of one mile from Medical Center along Pooks Hill Road, but with purposeful separation between those developments and the residential areas to the south.

Further, the closest areas north, east, and west of the Medical Center station are NIH and Naval Support Activity Bethesda property. This leaves only the arc from about .5 mile to 1 mile affected by the ZTA, covering central and southern Locust Hill, the adjacent Maplewood and Parkview neighborhoods, as well as some areas to the east of Old Georgetown Road and south of Cedar Lane.

Inclusion of central Locust Hill demonstrates the blunderbuss nature of ZTA 20-07: that part of our community has been found by the Maryland Historic Trust to be eligible for inclusion

in the National Register of Historic Places as an Historic District. According to the 2001 qualifying study (MHT file M:35-120):

The central section of Locust Hill Estates ... is eligible for the National Register under ... Criteria A as an excellent example of a planned suburban development that possesses all the character-defining elements of this type. As such, the community is significant and representative of the suburban movement in the Washington, D.C. region. Locust Hill Estates is eligible under Criteria C for its representative community design and excellent housing stock of Colonial Revival-style housing. The housing stock, primarily constructed between 1941 and the late 1940s, reflects a variety of building forms and architectural features. The central section is unified by a high level of architectural detail and ornament, *and by the harmonious streetscape of Colonial Revival-style houses* constructed within a relatively short timeframe. The community distinguishes itself from other circa 1940s suburban developments by the quality of building materials ... The community is also distinguished by the use of a curvilinear street pattern with an extensive integration of open space and parkways into the design. ... (Emphasis added.)

Most objectionably, ZTA 20-07 authorizes multifamily Apartment Buildings on lots of less than 25,000 square feet, for which “maximum density” limitations do not apply and for which no architectural or design standards are provided. Such standard-method development of Apartment Buildings clearly would be at odds with Locust Hill’s Historic Trust-recognized “harmonious streetscape” of single-family housing.

This situation illustrates the need for rejection of an interim approach to authorizing missing middle housing in R-60 communities based solely on distance from a Metro station, especially given the wide variation in communities and circumstances surrounding the thirteen stations to which the ZTA would apply. Instead, mechanisms by which zoning classifications and associated text can address missing middle house should remain part of the Planning Department’s processes, particularly the development of the Thrive 2050 Master Plan update.

We believe that such solutions should include greater specificity regarding the types of town house and apartment building development that are appropriate for the range of communities that have been developed within the R-60 classification, including whether and where they should be standard or optional uses. The process should also include enforceable architectural and/or design guidelines to ensure maximum consistency with the single-family communities in which such developments would be located. We are pleased to see that the Planning Department has included the need for design review in its Comments (at 13). We also urge that the process to designate neighborhoods as eligible for missing middle house include community engagement such as the Planning Department is using for the Silver Spring Plan (Comments at 4-5).

Thank you for considering Locust Hill’s perspective.