



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

September 10, 2024

Re: 2024-2028 Growth and Infrastructure Policy

Dear President Friedson, Vice President Stewart, and Councilmembers:

My name is Michael Larkin, and I am writing on behalf of [Montgomery for All](#). We are a grassroots, community-led group with over 200 members advocating for sustainable and inclusive land use, housing, and transit policies in Montgomery County, and are supported by the Coalition for Smarter Growth.

Montgomery for All considers the 2024–2028 Growth and Infrastructure Policy (GIP) an opportunity to continue aligning our county’s policies with Thrive 2050 and other plans such as the Pedestrian Master Plan and the Climate Action Plan. The GIP encourages the building of more affordable and attainable housing options and supports public transportation, walking, and bicycling as public benefits.

Montgomery for All points out the following recommendations as steps in the right direction:

3.2 Require a Local Area Transportation study (LATR) for any proposed development generating 50 or more peak-hour motor vehicle trips as stated on page 44 of the Index of Recommendations.

This recommendation revises the current policy that counts 50-person trips whether they be by car, truck, transit, walking, or biking. These transportation modes are obviously not all the same, nor do they have the same impact on transportation planning needs. It is preferable that a bus should only be counted once, and it no longer makes sense in light of the Climate Action Plan to assume walking and biking adds a burden that must be mitigated. This new standard aligns land use policy with more sustainable transportation options and not defaulting to automobile dependence.

3.4 Simplify the Non-Motor Vehicle Adequacy Test. The test will have five components: Pedestrian Level of Comfort (PLOC), illuminance, Americans with Disabilities Act (ADA) compliance, bicycle system, and bus transit system.

3.6: Refine the Vision Zero Statement to focus on managing speed for safety.

The focus of transportation needs to shift from moving cars as fast as possible to focusing on moving more people safely. These recommendations recognize our county needs an integrated transportation system to accomplish this shift of focus. All residents should be able to walk, roll, bike, and choose public transit as individual transportation options or in combination and do so safely.

3.11a Expand the current off-site mitigation exemption for affordable housing units, which currently only includes mitigation payments, to include constructed improvements.

3.11b Exempt development projects that meet the definition of a Mixed-Income Housing Community in Section 3.3.4a of the zoning code from the requirement to complete an LATR study.

3.12 Exempt multi-family units with three or more bedrooms in multi-family units from off-site mitigation construction and payment.

These recommendations could increase the financial viability of building more affordable and attainable housing and homes that can accommodate families. Montgomery County must simplify and reduce the cost of the housing construction process in light of the ongoing housing crisis.

4.3 Introduce a 50% transportation and school impact tax discount to single-family attached and detached units that are 1,800 square feet or smaller.

This discount encourages more compact land use and can lead to lower construction costs that will be passed onto residents through comparatively lower housing prices.

4.6 Exempt office-to-residential conversions from transportation and school impact taxes when the building is adaptively reused or renovated for multi-family housing. Offer a 50% transportation and school impact tax discount for office-to-residential conversions when demolition is involved.

Montgomery for All vigorously supports an all of the above approach to ending the housing crisis, and this exemption should help defray some of the significant cost barriers for office-to-residential conversions and larger units in multi-family buildings.

Montgomery for All notes much of the Planning Board's deliberations involved how our county will pay for infrastructure, especially for transportation. The revenues gained from various impact taxes are not inconsiderable. However, we urge the Council to recognize that raising impact taxes beyond a certain amount can prevent new housing construction. This is counterproductive to the stated goals of this Council, and it can lead to a smaller tax base to fund the services and infrastructure our county needs.

In conclusion, the 2024-2028 GIP update can move Montgomery County in the direction of ending the contrived scarcity of housing, incentivize the shift away from automobile dependence, and support more public transit and active transportation options. Montgomery for All recommends passage of the GIP as presented.

Sincerely,

Michael Larkin
Montgomery for All Steering Committee