

**ZONING TEXT AMENDMENT 25-01  
SELF STORAGE – CIVIC AND INSTITUTIONAL “STREET  
ACTIVATION AND VACANCY ELIMINATION” (S.A.V.E.)**

**Description**

ZTA 25-01 would allow the use Self-Storage above the ground floor in the CR zone, if it is an adaptive reuse of a vacant office building, and has a Charitable, Philanthropic Institution or a Cultural Institution use is on the ground floor.

ZTA 25-01  
Completed: 2-21-25

MCPB  
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2-27-25

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#### COUNCIL SPONSORS

Lead Sponsor: Council President Stewart

Cosponsors: Council Vice President Jawando, and councilmembers Fani-Gonzalez, Friedson, Mink, Sayles, Katz, Albornoz, and Luedtke.

#### PLANNING TEAM

Countywide Planning and Policy

#### PLANNING BOARD HEARING DATE

February 27, 2025

#### REVIEW BASIS

Chapter 59, Section 7.1.2

## Summary

- On February 4, 2025, the District Council introduced ZTA 25-01.
- This ZTA would expand the options for allowing Self Storage as a limited use in the CR including locating in the upper floors of a vacant office building and requiring certain community benefiting uses on the ground floor.
- A District Council public hearing on the ZTA is scheduled for March 11, 2025.

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## SECTION 1 – BACKGROUND

Zoning Text Amendment (ZTA) 25-01 was introduced on February 4, 2025, by Council President Stewart, and cosponsored by Council Vice President Jawando, and councilmembers Fani-Gonzalez, Friedson, Mink, Sayles, Katz, Albornoz, and Luedtke. A council public hearing is scheduled for March 11, 2025. This ZTA would help property owners of largely vacant office buildings that cannot be feasibly torn down or reused for a residential conversion to have an alternative adaptive use of the building. The use Self-Storage would be allowed in these buildings within the CR Zone if the ground level is used by a charitable, philanthropic institution, or cultural institution use. Currently, the use is only allowed if it is located below grade, below a building being primarily used for other purposes. Limited use standards proposed for the use include adaptively reusing an office building that has been 90% or more vacant for the past two years, project approval by a site plan, being located above the ground floor, and meeting other design and operation standards. The definition of Self-Storage in the zoning code is as follows:

*Self-Storage means a structure providing separate storage areas for personal or business use designed to allow private access by the tenant.*

Self-Storage facilities offer for lease individual locked storage rooms for storing belongings that are not being warehoused for distribution or sale. These uses often have dozens of separate storage rooms, either located in small warehouse-like structures with direct access to the outside, or as rooms contained within a larger weatherproofing structure.

## SECTION 2 – ZTA ANALYSIS AND RECOMMENDATION

The use Self-Storage is an Industrial Use under Division 3.6., Section 3.6.8. - Warehouse.

### EXISTING CODE SECTIONS

Beginning on line 6 of the ZTA, the existing definition and use standards for Self-Storage are displayed. This is followed by the existing limited use standards for Self-Storage in the CR zone, which allow the use only if in a basement or cellar, the provision of a loading facility, individual doors to individual units, and a dimensional limit for signage. (lines 15-26). The ZTA modifies this section slightly, removing the word “only”, and adding the words “and the following standards”, setting the stage for the new section of code providing a new set of limited use standards for the use in the CR Zone.

The ZTA also shows the existing code language that allows Self-Storage as a conditional use, starting on line 51, to provide context for where the new use standards will be in code.

## NEW CODE SECTION

Starting on line 27 of the ZTA are new limited use standards that provide an alternative pathway to approving Self-Storage within the CR zone. The new limited use standards make approval contingent on a site plan, and the following paraphrased requirements:

- The use is located above the ground-floor in an existing building;
- The building is an office building that is 90% or more vacant for two consecutive years;
- The ground floor fronts a public sidewalk or other public pedestrian route, and contains a Charitable, Philanthropic Institution, or a Cultural Institution Use;
- Any renovations would not preclude adaptive reuse back to office or into residential in the future, and the existing office façade is maintained;
- Loading is provided, not directly accessing a Boulevard street type;
- The storage units are accessed from the interior of the building, and
- Signage is limited to 40 square feet.

Montgomery Planning Staff appreciate the intent of this ZTA, finding alternative activating uses for otherwise abandoned and difficult to redevelop properties within our urban areas. While Self-Storage is not the highest and best use in our CR zoned areas for creating regular foot traffic or providing much needed housing, there are both a demand for additional storage options within the county, and the ZTA offers many safeguards to minimize any negative impacts.

Planning Staff conducted a quick assessment of the Self-Storage industry in the local market (Attachment B) and found an approximately 94% utilization rate of Self-Storage within the county, that growth in the industry is closely tied to population growth and in-migration, and that building valuation of Self-Storage facilities is higher than older suburban office buildings. There is likely an unmet demand for more of this use, especially closer to areas where the population is increasing the most.

The ZTA also contains multiple use standards that will help reduce the visual and operations impacts of Self-Storage in CR zones, including the activating ground floor uses, the retention of the office building façade, and loading being prohibited from Boulevard street types. Planning Staff however have two areas of consideration to enhance this ZTA.

**1) Modify Section 59-3.6.8.D.2.a.iii. (c) (lines 36-39) to require the applicant to show intent to fill the ground floor space with the allowed community serving uses.**

The purpose of subsection (c) in the ZTA is to ensure a street or sidewalk activating use, that also serves a community benefit. Planning Staff are very supportive of this requirement, but raise concern that as drafted, it could be possible for an applicant to agree to a site plan condition limiting the ground floor uses, and that the ground floor could end up vacant. Charitable, Philanthropic Institutions are tax exempt organizations that provide community education and social services. Cultural Institutions include uses such as museums, art galleries, and libraries. These uses do provide clear community benefit, but are very specific,

and may be difficult to find tenants that could fill the entire ground floor space of a building. An amendment requiring a management agreement or lease agreement at the time of plan approval should be considered to provide more assurance the space will be used and activated.

**2) Clarify Boulevard Street Types.**

Requirement iii (e) starting on line 44 of the ZTA states that on-site loading facilities are not on a Boulevard street classification. There are currently three types of Boulevard streets, including Boulevard, Town Center Boulevard, and Downtown Boulevard. To avoid any confusion, Planning Staff recommend a small technical edit as follows:

(e) the application includes on-site loading and unloading facilities and loading facilities are not on **any of the** Boulevard street classifications under Chapter 49.

Planning Staff also considered this ZTA against other County and Planning policies including repurposing vacant commercial space into residential uses where possible. The need for additional housing in the county is well documented, and the conversion of office to residential is actively being incentivized with the recently introduced More Housing N.O.W (New Options for Workers) package. The intent with this ZTA is to provide an additional use option for existing abandoned buildings that are not financially viable for demolition or renovation due to their size, location, and market conditions. Ultimately Planning Staff is not recommending any additional amendments to the ZTA because it would be difficult for Planning Staff to determine financial viability, and it seems unlikely a property owner would let property in a CR zone remain over 90% vacant for multiple years if there was a viable alternative for redevelopment.

## SECTION 3 – CLIMATE ASSESSMENT

The Planning Board is required to prepare a climate assessment for each zoning text amendment, master plan, and master plan amendment. Each climate assessment must include the potential positive or negative effects a ZTA may have on climate change (including greenhouse gas emissions) and on community resilience and adaptive capacity. The climate impact assessment for ZTA 25-01 is attached in Attachment C.

In the climate assessment conducted for ZTA 25-01, Planning Staff found that the ZTA would have minimal to no net impacts on carbon emissions and sequestration, and a slight positive impact on community resilience and adaptive capacity. Adaptive reuse of existing structures is a positive for reducing things like embodied emissions, but potential impacts from additional impervious areas for loading, and an unknown impact to vehicle miles traveled negate the positives. There will likely be a slight positive impact on community resiliency and adaptive capacity as having the street level of the

building activated with community service uses may enhance safety, spur economic development and improve overall quality of life.

## **SECTION 4 – CONCLUSION**

Planning Staff recommends the Planning Board transmit comments to the District Council supporting ZTA 25-01 with recommendations to consider requiring proof of infeasibility to demolish or convert the building to residential use, and to expand the allowed ground floor activating uses to include other institutional and retail uses.

## **SECTION 5 – ATTACHMENTS**

Attachment A – ZTA 25-01 Intro Packet

Attachment B – Self-Storage market analysis

Attachment C – Climate Assessment for 25-01