



March 11, 2025

The Honorable Council Chair Stewart and Members of the Montgomery County Council:

Thank you for the opportunity to express the Northwood-Four Corners Civic Association's (NFCCA) views regarding ZTA 25-02, titled More Housing N.O.W. This proposal applies to University Boulevard and Colesville Road, which each lie along two NFCCA boundaries, with the Northwest Branch and Northwood High School on the other two sides. There are approximately 1486 single family households in the NFCCA community, plus an additional 121 residents in The Oaks senior housing community.

ZTA 25-02 was introduced on February 4, 2025, with this public hearing today just five weeks later. Even the Planning Board was not given an opportunity to review ZTA 25-02 prior to its introduction, and staff pushed to develop their analysis, which was made public on February 27<sup>th</sup>. Pertinent information, such as the corridors subject to ZTA-02, was not available until a week after introduction. To put it simply, the Council has not adequately made the case that there is a sufficient housing emergency justifying this rush.

This haste leaves insufficient time for civic associations to communicate with their members and prepare for formal consideration of resolutions in compliance with bylaws. NFCCA urges the Council to schedule an additional public hearing to give residents and communities adequate time to evaluate this proposal, discuss and adopt formal policy positions, and prepare more detailed analysis to further inform our testimony.

NFCCA is prepared to address certain issues presented by ZTA 25-02, but only because we have been considering similar issues with respect to the ongoing University Boulevard Corridor Plan (UBCP.) Presently a fairly large portion of the NFCCA community falls within the UBCP boundaries. To prepare NFCCA's response to the UBCP, we circulated a survey highlighting elements of that plan. The 79 responses we received were useful in developing NFCCA's position on the UBCP.

Given that ZTA 25-02's housing density proposal is similar to the UBCP's upzoning recommendations, those survey responses are all NFCCA has to inform our response here to several aspects of ZTA 25-02.

Although the community's views on the UBCP recommendations were not unanimous, many NFCCA residents are clearly concerned that the Commercial Residential Neighborhood (CRN) and Commercial Residential Town (CRT) upzoning recommendations in the UBCP affect far too many properties. The UBCP contemplates CRN upzoning for more than 200 single-family properties in the NFCCA community, of which 58 properties directly front University Boulevard or Colesville Road (to Lorain Avenue). An additional 8 properties on the ZTA 25-02 map lie outside the UBCP boundary (Colesville between

Lorain and Sutherland Avenues). The ZTA 25-02 map identifies a total of 66 properties in the NFCCA community.

By limiting ZTA 25-02 to corridor-fronting properties, the potential added density will impact the NFCCA neighborhood less than envisioned in the UBCP. Some NFCCA residents are open to greater housing density on a less intensive scale, such as redevelopment as duplex or triplex townhomes. Duplexes were supported by 42 percent of the survey respondents, while support for triplexes was at 15 percent. This contrasts with the views of 33 percent of respondents who oppose any higher housing density.

The FAR for the CRN zones in the UBCP is 1.0 with a height limit of 50 feet, while ZTA 25-02 sets the FAR at 1.25 with a height limit of 40 feet. The higher FAR in ZTA 25-02 is not a great concern, but probably will result in smaller units, particularly given the relatively compact lots prevalent throughout our neighborhood.

Our survey respondents were concerned that the 50-foot height limit in the CRN zone for the UBCP should more closely match the current R-60 limits of 35 to 40 feet that presently apply; 41 percent of respondents approved of a height limit of 40 feet or less. The question remains, however, which height limit or FAR will control if the UBCP recommendations and ZTA-02 are both adopted as written?

Our survey also covered “likes” and “dislikes” about our community. At 47 percent, respondents liked “Lower home prices compared to the rest of the county.” The list of dislikes included “Traffic congestion on University Boulevard” (58 percent), “cut-through traffic and speeding” (64 percent) and “On-street parking is limited” (29 percent.)

The NFCCA community is a diverse neighborhood with many homes that could be characterized as naturally occurring affordable single-family housing. Currently, Zillow valuation estimates for properties fronting our corridors range from mid-\$400,000 to mid-to-upper \$500,000 range (except for a small number of infill and substantially renovated units). One often-heard concern is whether future redevelopment could replace relatively affordable single-family starter homes with more expensive housing.

Although multi-unit property redevelopment could increase the county’s overall number of housing units, new homes may be as or more expensive than the housing stock they replace. Today under the current zoning rubric, we acknowledge that redevelopment is limited to market-driven McMansions, home additions, or accessory dwellings.

The rationale UBCP planners have given NFCCA for the CRN designation of over 200 properties in the community is: 1) their interpretation of “block” captures intersecting courts, and 2) nearby current or future Bus Rapid Transit (BRT) stations. Ultimately, it would be fairer for housing density under the UBCP to mirror the Council’s final determination regarding housing density in ZTA 25-02, once adopted.

The UBCP estimates that as many as 4000 new residential units can be developed along the 3.5 mile plan area. ZTA 25-02 proposes housing density on a more modest scale at half that estimate *countywide*. In that respect, ZTA 25-02 is more acceptable to many residents in nearby single-family neighborhoods, because it limits upzoning solely to properties with frontage directly on a corridor and is more sensitive to height, setback requirements, and density. Yet again, the issue of deconfliction arises—which of these proposals controls the outcome for our neighborhood?

There is majority support for maintaining current setback requirements, with 43 of our 78 survey respondents disagreeing with elimination or reduction of existing R-60 setback requirements. After a conversation with one of the ZTA 25-02 sponsors, we were informed that the measure applies to individual lots, not an assembled parcel of several lots. Therefore, each individual lot is subject to existing setback requirements. This may result in less density, because lot-by-lot redevelopment will likely produce only duplex and triplex homes, particularly in neighborhoods with smaller lots.

NFCCA is concerned that County agencies and public utilities could be forced to play catch up to fund and construct adequate infrastructure, such as schools, upgraded roads, utilities, or provide adequate emergency services, etc. The County's Growth and Infrastructure process is slow moving. Will the County respond in a timely manner to public needs as future ad hoc housing redevelopment occurs? By limiting the degree of additional housing density to corridor facing properties, ZTA 25-02, in contrast with the UBCP, will have a more moderate impact on infrastructure.

It's no surprise that eliminating or reducing parking requirements applicable to redeveloped properties is unpopular. ZTA 23-10 exempted redeveloped properties from baseline parking minimums for redevelopment within ¼ mile of a BRT station; this already applies near the Four Corners BRT station. Once BRT on University Boulevard is funded for construction, parking will not be required for redevelopment there.

On-street parking is generally permissible on neighborhood streets intersecting Colesville Road and University Boulevard; however, parked cars on many of these narrow streets *already* reduce passage to a single lane, forcing drivers to move into a curb lane space to avoid oncoming traffic. Adding greater housing density, without requiring parking, will place further demands on scarce on-street parking availability. At the expense of congested, unnavigable streets, the minimal savings of approximately \$5000 per parking space<sup>1</sup> will do little to increase housing affordability.

NFCCA residents overwhelmingly believe parking should be required because there is insufficient on-street parking available. If planners are concerned about runoff in sensitive or hilly areas, permeable surfaces can be required under the optional method of development.

CRN upzoning in the UBCP will allow "by right" development after filing a building permit. Optional Method Development involves Planning Board review of a site plan. Developers may be likely to choose by right development over the more regulated process and building types under ZTA 25-02, which could undermine the goal of encouraging more affordable housing. Yet again, we ask, which approach will apply to properties fronting the corridors?

Also, the UBCP's recommendations to reduce travel lanes on both University Boulevard and Colesville Road could exacerbate congestion and increase cut-through traffic in our neighborhood. Drivers will turn onto neighborhood streets to avoid congested traffic on the

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<sup>1</sup> [Attainable Housing Strategies Report](#), 2024, at page 42 observed that, "A recent American Planning Association article noted that various studies indicate that surface parking lot spaces cost upwards of \$5,000 each, while above-ground parking garages average around \$25,000 per space and below-ground garages average around \$35,000 per space."

corridors. It seems counterintuitive to significantly reduce traffic lane capacity, while adding housing density at the same time.

We would also like to point out that the Polychrome Historic District is a national historic district; two of these homes front onto Colesville Road and appear to be designated by the ZTA 25-02 map as subject to potential redevelopment.

Finally, and perhaps most important for addressing a key aspect of ZTA 25-02—its affordability goals—NFCCA cannot comment on the issue of the 15 percent workforce housing requirement or the AMI standard in the bill, because we have had insufficient time as an organization to develop a policy position.

In conclusion, NFCCA is concerned that the UBCP, and to a lesser extent ZTA 25-02, prioritize higher-density development without making the necessary critical recommendations to address infrastructure limitations, traffic congestion, and parking shortages. Yet, except for the workforce housing set aside, there is no assurance that the redeveloped housing stock will be more affordable than the homes they replace.

There has been insufficient analysis of the potential increase in traffic congestion, loss of available parking on neighborhood streets (many of which do not have driveways and/or lack adequate off-street parking), or loss of single-family housing stock priced significantly below other areas of the county.

County Executive Elrich has noted his concern “... about the displacement of lower-income households along major roads. Currently, many of the homes along major roads are rented by lower-income families. One of the ZTAs could incentivize owners to sell their property for redevelopment. And very likely the replacement units would be smaller and more expensive than the existing housing. The impact of increased development on infrastructure also needs to be assessed. Primarily, this concerns schools, transportation and parking, but it also includes trees, stormwater management and flooding, emergency services, public safety and parks. Those are major issues for consideration that are central to maintaining our quality of life for diverse communities.”

NFCCA believes that more time is necessary to adequately evaluate the impact of ZTA 25-02 and fully understand the cross-walk between UBCP recommendations and provisions of ZTA 25-02. There needs to be more clarity provided for the areas where ZTA 25-02 and the UBCP provide or impose different requirements.

Residents and community associations deserve to have their voices heard and their questions answered in order to reach a consensus on important elements of this zoning amendment. Thank you for reviewing these comments and concerns, and we request that this statement be included in the hearing record.

Respectfully,  
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