

Testimony of Eric Gabler
Resident of South Four Corners, Silver Spring,
on the
University Boulevard Corridor Plan
September 22, 2025

Introduction: My name is Eric Gabler. I have been a resident of the South Four Corners neighborhood in Silver Spring for 34 years. A previous draft of the following document was the basis for my oral testimony to the County Council given on September 10, 2025.

The Planning Board's final draft of the University Boulevard Corridor Plan (UBCP), prepared by Montgomery Planning under the direction of the Montgomery County Planning Board, would impose major adverse changes on the lives of many people living along the 3.5 mile long University Boulevard Corridor (UBC) that extends from Amherst Avenue to I-495. The UBCP proposes to more-than-double residential density within the corridor over the 20 years of the plan, even though it provides no evidence that such density is needed to meet County housing needs. The UBCP would place large concentrations of new housing in areas with significant exposure to vehicle emissions, potentially harming new and existing residents alike. The UBCP would open existing neighborhoods along the UBC to much more cut-through car traffic by removing lanes on University Blvd and opening new routes and entry points for traffic to divert into residential streets. Important neighborhood stores and amenities that have served the local community for almost three generations would be replaced by commercial residential buildings with no assurance that the stores would ever return. Contrary to the promises of the UBCP, environmental quality would be compromised, not improved. Unfortunately, many residents along the corridor do not know about these potential problems because the UBCP drafts and consultation process did not present or evaluate them.

The following text elaborates on these and other problems of the UBCP. It emphasizes issues of concern for the neighborhoods around Four Corners, and especially South Four Corners where I live. There is already ample testimony regarding problems with the UBCP submitted by members of other communities along the UBC.

Unjustified Scale of the UBCP: The scale of the UBCP, which seeks to add 4,000 new residential dwelling units to the 3,500 dwelling units already on the UBC, is excessive for the following reasons:

- Unutilized Capacity Elsewhere.* The Planning Board’s decision to add up to 4,000 new dwelling units to the 3.5-mile-long UBC zone (an area of approximately 1.5 square miles) appears to have been made without consideration of approximately 30,000 residential dwelling units already approved for permitting but not yet built in Montgomery County and 85,000 other dwelling units zoned for development in existing master plans of Montgomery County. All these 115,000 potential dwelling units are located in places compatible with Smart Growth objectives. Based on official forecasts, Montgomery County is expecting fewer than 75,900 new households between 2025 and 2050, a 19 percent increase from 2025 levels (see <https://montgomeryplanning.org/tools/research/forecasting/>, “Countywide Forecast Summary”). Thus, already-zoned potential dwelling units across the County significantly exceed expected future population needs. At the very least, the County should fully understand why existing capacity for new dwelling units is not being utilized and resolve any identified problems before aggressively rezoning long-established neighborhoods along the UBC and other corridors. Doing so could save these neighborhoods from unnecessary and uncompensated costs that would result if plans like the current UBCP are implemented. Note that an effort in this area was recently announced, perhaps motivated in part by strong popular resistance to the UBCP and Attainable Housing Strategies Initiative (AHSI)(see <https://bethesdamagazine.com/2025/09/19/development-pipeline-analysis-housing-projects/>).
- Montgomery County Is Not Out of Room for New Development.* The argument that housing density must be greatly increased in already-built areas of Montgomery County to protect the County’s agricultural lands is invalid. Unlike some cities on the U.S. West Coast, Minneapolis, MN, or New York City, Montgomery County is nowhere near being built-out to the point that its only option is extensive rezoning to higher density in existing neighborhoods.
- Uncompensated Costs Imposed on Existing Neighborhoods.* The already-approved development sites in existing Montgomery County master plans were selected in part to minimize the imposition of inconveniences and uncompensated costs on residents living in nearby neighborhoods, whereas the aggressive and invasive rezoning proposed by the UBCP would impose substantial costs on the residents of existing UBC homes and those of nearby neighborhoods. These costs include higher cut-through traffic volumes on residential streets, exposure to more vehicle emissions, loss of neighborhood parking, elimination of local stores and institutions, prolonged periods of construction noise and disruptions, and other factors (described in more detail below). These and other impacts will reduce property values for many residents.

Note that people who purchase homes in zoned, built-out areas such as the neighborhoods along the UBC often do so with the expectation of neighborhood stability.

- *Housing Demand Will Moderate from Recent Levels.* The officially projected 19 percent increase in the number of Montgomery County households between 2025 and 2050 is almost certainly too high for many reasons, both local and national. At the local level, recent and continuing reductions in jobs among Federal agencies and contractors, as well as among non-profit organizations funded by Federal money, will likely lower the rate of population growth compared to what was expected a few years ago. Widespread and rapid applications of Artificial Intelligence technologies will also reduce demand for white collar office workers who might otherwise have come to Montgomery County. Planners from a few years ago may also not have factored other recent demographic developments (particularly lower net immigration levels) into forecasts of County population growth. Finally, many factors other than population growth which contributed to recent housing shortages and price growth (e.g., very low mortgage rates, record federal deficit spending during the pandemic) are now likely behind us. Hence, forces already underway may start to cool housing demand and reduce the need for aggressive and disruptive rezoning proposals.
- *Unfair Burden Imposed on the UBC.* The UBCP's goal of increasing dwelling units by 4,000 in the UBC would represent a 114 percent increase in density within this corridor, far out of proportion to the projected 19 percent countywide growth in households between 2025 and 2050. Why is the UBC, which constitutes less than 4/10 of 1 percent of the total land area of Montgomery County, expected to carry such a disproportionate share of new housing to meet countywide housing needs? The UBC has no exceptional infrastructure to accommodate such growth. On the contrary, there are important reasons not to add denser housing to the corridor (see The UBC Is the Wrong Place for Concentrated Redevelopment).
- *Violation of Terms Established by ZTA 25-02 Workforce Housing – Development Standards.* The County Council recently approved ZTA 25-02 on the premise that it is a fair and reasonable allocation of rezoning throughout the County. Now, even though there is nothing exceptional about the infrastructure along University Blvd, the UBCP proposes to: 1) rezone more than four times as many properties along University Blvd than does ZTA 25-02; 2) permit taller building heights (up to 100 feet high) than does ZTA 25-02; 3) allow rezoning that reaches into neighborhoods, unlike ZTA 25-02; and 4) change the street grid of the UBC and surrounding neighborhoods. Also, unlike ZTA 25-02, the UBCP appears to permit the controversial “by right” development of duplexes

and townhouses, although the term “by right” is not used or discussed in the UBCP draft. Given that the UBCP violates the assurances given by ZTA 25-02 to communities adjacent to University Blvd, why should communities adjacent to other boulevards in Montgomery County trust the commitments made by the County Council regarding ZTA 25-02? As communities lose trust in the planning process, future planning will become increasingly controversial.

The UBC Is the Wrong Place for Concentrated Redevelopment: Not only is major densification of housing in the UBC not essential to house future residents or protect the County’s agricultural lands, the UBC is not a good corridor for high density housing for the following reasons:

- *Lack of Jobs Along the UBC.* Most of Montgomery County’s jobs are located along the I-270/355 corridor, with comparatively few in the UBC. The County’s future workers would be better served by housing located closer to these jobs, particularly if the workers are relying on transit trips (which are slower on average than automobile trips for any given distance) to access places of employment.
- *Destruction of Existing Affordable Housing.* The UBC is an important source of Naturally Occurring Affordable Housing (NOAH), which is often rented by lower income people. The UBCP rezones much of this NOAH property, making it attractive to developers who are seeking low cost lots on which to build more expensive townhouses and duplexes for middle income buyers. This conversion of NOAH to duplexes would therefore displace the many lower income residents (see The UBCP Will Not Create More Affordable Housing and Appears Biased Against Low Income Residents). The UBCP does not discuss this displacement and makes no commitment to increase the supply of affordable housing.
- *Placement of Large Residential Structures Near Locations of High Vehicle Emissions.* The UBCP would permit the building of nine large commercial residential buildings of 75 to 100 feet in height at Four Corners (where there currently is an absence of such buildings). These sites could collectively house more than 2,000 people as presently rezoned, all within 500 feet of the intersection of U.S. Route 29 and University Blvd through which more than 100,000 vehicles travel each day (40,000 trips per day on University Blvd plus 70,000 trips per day on U.S. Route 29 at Four Corners—see https://www.roads.maryland.gov/Traffic_Volume_Maps/Montgomery.pdf). People living in residences located within 500 feet of roads and intersections that accommodate 100,000 or more vehicles per day are subject to unhealthy levels of vehicle emissions (see <https://danieldobbs.org/3123-2/>). Additionally, the Four Corners location is within 1,100 to 1,500 feet of I-495 with its 200,000 vehicles per day, which adds to the emissions at Four Corners (depending on

time of day and wind direction). At the same time, the emissions from cars owned by the new residents at Four Corners would put increased strain on the health of existing residents of the Four Corners neighborhoods, with these new vehicles entering neighborhood streets within 30 feet of some homes that are already within 500 feet of I-495, U.S. Route 29, or both. The UBCP says nothing about the vehicle emissions at Four Corners, which cannot be mitigated by simply planting trees. Responsible planning would have considered the closeness of housing to emissions and sought to locate large apartments buildings farther away from, rather than directly at, Four Corners. Note that it is too late to change the location of Montgomery Blair High School, which is very close to I-495 and the Four Corners intersection, but this locational mistake of 30 years ago should not be repeated by co-locating large residential blocks in the same area. Note also that the UBCP calls for placing new multifamily residences fronting University Blvd very close to the traffic on this road (within 35 feet). Residents in such close proximity to traffic on University Blvd will experience concentrated traffic emissions.

Misleading Argument that the UBCP Is Essential for Safety: Montgomery Planning promotes the UBCP as a means to establish a safer transportation environment for residents and travelers along University Blvd. To do so, the UBCP would remove through-lanes from University Blvd at Four Corners, make existing lanes on the road narrower, reduce speed limits, add traffic signals, place taller buildings next to the roads, etc., all of which Montgomery Planning believes will slow traffic and improve safety. This is a misleading justification for the UBCP, however, because several of these provisions will divert traffic into the narrow streets of neighborhoods, reducing safety there. Fortunately, there are effective, less disruptive, and more immediate ways to improve safety along the UBC that do not require the extensive redevelopment proposed by the UBCP.

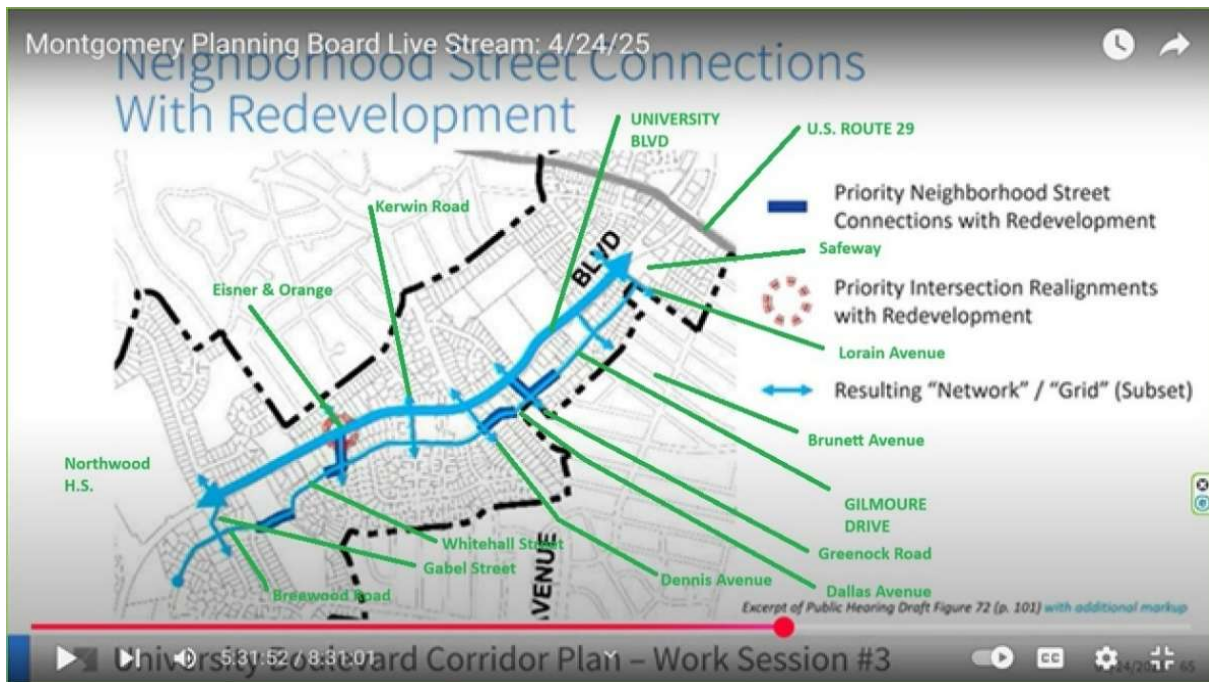
- *Creating Congestion on University Blvd Will Divert Cars into Neighborhoods.* By reducing capacity on University Blvd, the UBCP would congest traffic on University Blvd and cause more cars to divert into narrow residential streets to get around the congestion (see The UBCP Would Open Neighborhoods to Major Increases in Cut-Through Traffic). This increased cut-through traffic flow, often operating at unsafe speeds, will jeopardize the safety of residents.
- *A Plan Is Already Underway to Improve Safety.* The Maryland Department of Transportation (MDOT), through its Pedestrian Safety Action Plan for University Blvd, is already exploring safety improvements that are not linked to the UBCP, and which can be done without requiring zoning changes, densifying housing along the boulevard, opening residential streets to more traffic, or creating uncomfortable driving conditions. Just as importantly, the improvements can begin quickly, not requiring the many years it would take to

place taller buildings along the corridor and change street grids (as proposed in the UBCP).

The UBCP Would Open Neighborhoods to Major Increases in Cut-Through Traffic: Several features of the UBCP will open Four Corners neighborhoods to much more cut-through car traffic than they already have. These features consist of the following:

- *Lane Reductions on University Blvd Will Cause Congestion.* The UBCP calls for reducing lane capacity on University Blvd at its intersection with U.S. Route 29. This reduction of one through-lane in each direction (eastbound and westbound) will almost certainly lead to increased traffic backups, forcing cars to seek alternative routes through neighborhood streets. Only if the University Blvd Bus Rapid Transit (BRT) service is in place and wildly effective in causing people to give up car trips (which is unlikely) could this congestion be avoided (see UBCP Dependence on BRT Service).
- *More Traffic from New Residents.* The UBCP's addition of up to 4,000 dwelling units (housing up to 10,000 people) along the UBC will add significantly more car traffic on University Blvd (currently at 40,000 car trips per day) and the surrounding residential streets.
- *New Traffic Routes through Neighborhoods.* The UBCP would connect existing residential streets together to form a continuous automobile route parallel to University Blvd, between Gabel Street (near Northwood High School) and Lorain Avenue (near the Safeway at Four Corners). Specifically, segments of Gilmore Drive that are currently separated from each other would be linked together and then connected to sections of Whitehall Street and Breewood Road (in Sligo Woods) (see Figure 1 below, where the lower of the two long blue parallel lines is the extended Gilmore Drive). Greenock Road would also be connected directly to University Blvd, as would Orange Drive. Tenbrook Drive would connect directly to University Blvd at the location of the Northwood Presbyterian Church (not shown in Figure 1). Collectively, this new street network would enable University Blvd traffic to divert directly into the neighborhoods of South Four Corners and Sligo Woods from multiple new entry points.

Figure 1: Newly Created Connected Street Along University Blvd (Note that the green labeling of streets in the figure is my own)



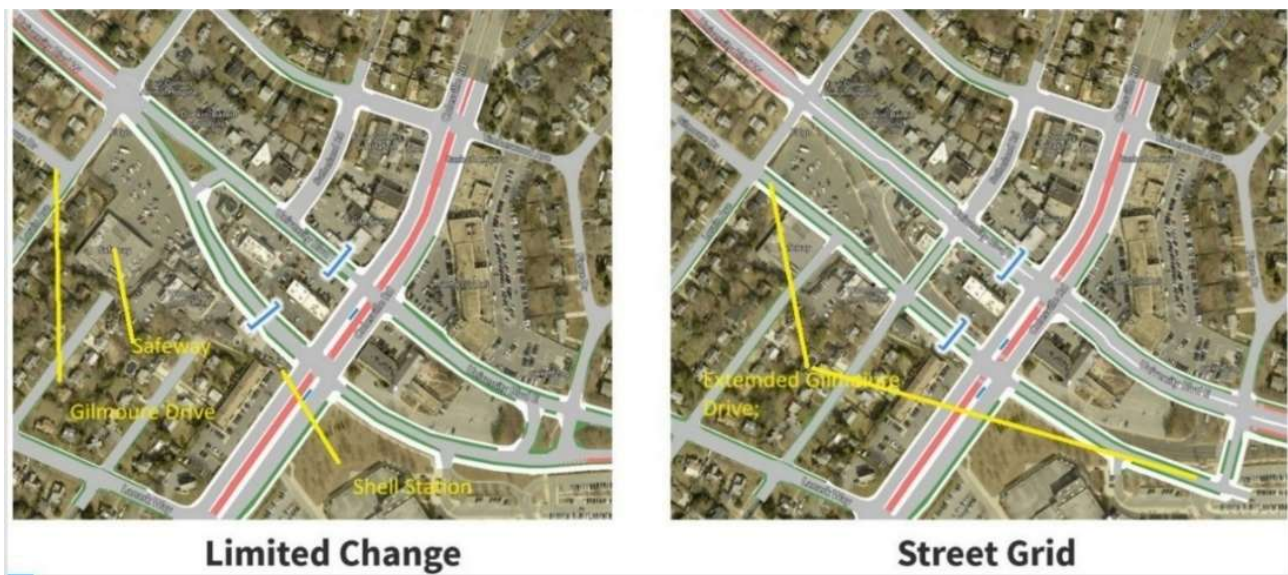
- *The UBCP Lacks Discussion about the Revised Street Network.* The map shown in Figure 1 is from a live briefing given to the Planning Board by Montgomery Planning on April 24, 2025—one month after the public comment period for the UBCP closed in March 2025 (see <https://www.youtube.com/watch?v=e14fntvcG30&t=19836s> at 5 hours and 32 minutes). This map is not included in any draft of the UBCP itself (see *Lack of Clarity in Presenting Controversial Material*). Similarly, the UBCP provides no information about traffic volumes that might use this Gilmore Drive network. A spokesperson for Montgomery Planning asserted on April 24, 2025, that cut-through traffic is unlikely to use the connected Gilmore Drive. Anyone who uses Waze, however, knows that Waze will guide cars experiencing heightened congestion on University Blvd into interior residential streets to avoid the congestion, including via Gilmore Drive, Greenock Road, and Orange Drive as well as streets that branch off of Gilmore Drive (e.g., Dallas Avenue, Brunett Avenue, Lorain Avenue, etc.). Cars will also seek unsignalized residential streets to avoid the more frequent traffic signals on University Blvd (see *Effects of New Traffic Signals on Neighborhood Traffic*).
- *Residential Street Access to Buildings Fronting University Blvd.* The UBCP would also connect interior neighborhood streets to redeveloped properties fronting University Blvd. At Four Corners, for instance, interior residential streets would connect to apartment buildings with 50 to 200 dwelling units each, bringing large volumes of traffic into formerly lower-traffic

neighborhoods (particularly if apartment residents are restricted from accessing University Blvd directly).

- *Effects of New Traffic Signals on Neighborhood Traffic.* The UBCP proposes new traffic signals at Lorain Drive/University Blvd and Greenock Road/Royalton Road/University Blvd. Other new signals will be placed elsewhere along University Blvd. It is true that these new signals will improve pedestrian safety, but they will also increase north-south cut-through traffic into Four Corners neighborhoods. The UBCP should have discussed ways to limit increases in cut-through traffic.
- *Loss of Neighborhood Cul De Sacs.* The extended Gilmore Drive shown in Figure 1 would open the cul-de-sacs on Dallas Avenue, Gilmore Drive, and Greenock Road to through-car traffic, meaning that some 40 homes located on the current cul-de-sacs would be facing much higher traffic. In the Sligo Woods community, Whitehall Street and the final northwestern segment of Tenbrook Drive would also no longer be cul-de-sacs. The UBCP says nothing about this.

Bad Faith Negotiation on the “Street Grid” Option: As invasive as traffic into interior neighborhoods would be using the expanded residential street network shown in Figure 1, there is another provision in the UBCP that could make cut-through traffic much worse for South Four Corners. This provision requires a “near-term study” of extending Gilmore Drive from Lorain Avenue to U.S. Route 29 and beyond to Lexington Drive (where Gilmore Drive would then connect to University Blvd). This scenario (originally called the “Street Grid” option in earlier stages of the UBCP discussions), would eliminate the current split (“couplet”) intersection at Four Corners. Figure 2 shows the current intersection layout (the “Limited Change” scenario) next to the “Street Grid” scenario which is the focus of the near-term study.

Figure 2: Four Corners Transportation Scenarios (Note that the yellow labeling in the figure is my own)



Earlier in the UBCP consultation process (during Summer 2024), the Four Corners neighborhoods objected strongly to the “Street Grid” scenario. Residents recognized that this scenario would direct large volumes of car traffic into the Four Corners residential neighborhoods via Gilmore Drive from U.S. Route 29, University Blvd (via the connection at Lexington Drive), and the large buildings proposed in the UBCP for the Four Corners intersection. The extended Gilmore Drive would also destroy important neighborhood resources such as the Safeway, the Post Office, and the gas stations. Community opposition was so strong to this proposal that by October 2024 Montgomery Planning agreed to drop the “Street Grid” scenario from the UBCP in favor of the “Limited Change” scenario (which maintains the existing “couplet” intersection at Four Corners). Montgomery Planning’s decision to drop the “Street Grid” scenario was reportedly informed by traffic modeling that confirmed that the flow of traffic into the South Four Corners neighborhood would be excessive. Oddly, however, Montgomery Planning did not provide the public with numerical data of forecasted traffic volumes on Gilmore Drive (see Inadequate Traffic Forecasts).

Unfortunately, this victory of common sense for the Four Corners community (i.e., the withdrawal of the “Street Grid” scenario) was undermined shortly thereafter by the inclusion of the “near-term study” language in the January 2025 UBCP Working Draft that calls for an immediate reconsideration of the “Street Grid” scenario after the UBCP is approved. This recommendation for the near-term study remained in the final UBCP Summer 2025 draft (see <https://montgomeryplanning.org/wp-content/uploads/2025/07/Planning-Board-Draft-Final-7-23-Comm.pdf>, pp. 112-114). The inclusion of the recommended study is ominous because:

- *The “Near-Term Study” Seems Preordained to Favor the “Street Grid” Scenario Opposed by Community.* Given the strongly positive spin for what is effectively the original “Street Grid” scenario in the UBCP’s description of the “near-term study,” it seems clear that the study will find a justification for extending Gilmore Drive from Lorain Avenue to Lexington Drive. The Planning Board will then quickly amend the UBCP to include the “Street Grid” as the recommended design so as to prevent new development at Four Corners from occurring in the “wrong” places (i.e., within the layout at Four Corners currently defined by the “Limited Change” scenario). This subterfuge of reinserting the “Street Grid” scenario back into the UBCP represents bad faith consultation with the neighborhoods of Four Corners. It appears to be a form of deception.
- *South Four Corners Neighborhood Would Become an Expansion of the Four Corners Intersection.* Note that if the Gilmore Drive extension to U.S. Route 29 and Lexington Drive is recommended by the near-term study, the extension of Gilmore Drive to Lexington Drive would become the final component of a continuous parallel route along University Blvd between Gabel Street and Lexington Drive (see Figure 1, which would be modified by extending Gilmore Drive beyond Lorain Avenue to Lexington Drive). South Four Corners would become part of an expanded Four Corners intersection with higher traffic throughout its residential streets.

Inadequate Traffic Forecasts: During the public outreach process for the UBCP (May 2024), the South Four Corners Civic Association (SFCCA) requested a forecast of the amount of traffic that would enter the Four Corners neighborhoods from the changes in road configuration associated with the “Street Grid” scenario. At that time, SFCCA had not been informed that Gilmore Drive would also be extended northwest to Gabel Street (see The UBCP Would Open Neighborhoods to Major Increases in Cut-Through Traffic). Montgomery Planning agreed to provide the forecast.

- *Incomplete Street Coverage and Unspecified Assumptions of Forecast.* Several months after SFCCA’s request for a traffic analysis, Montgomery Planning announced that a traffic forecast of the “Street Grid” scenario had revealed an excessive amount of cut-through traffic on South Four Corners residential streets associated with the “Street Grid” scenario, but showed little delay as of the year 2045 for cars on University Blvd and U.S. Route 29. The quality of this traffic modeling analysis is unclear because the assumptions used to do it are not well-described. For instance, the assumed future ridership of the University Blvd BRT system is not specified, nor did the forecast evaluate scenarios where the BRT is not built. Also, although Gilmore Drive is central to the proposed street realignments in both of the original UBCP scenarios (“Limited Change”

and “Street Grid”), Montgomery Planning provided no estimates of future traffic levels for Gilmore Drive, or for Greenock Road, Dallas Avenue, and other street segments connected to Gilmore Drive in the Sligo Woods neighborhood.

- *Higher Traffic Levels on Residential Streets Cannot Be Dismissed.* It cannot be assumed that there would be no increase in car traffic on Gilmore Drive and other connected residential streets in the “Limited Change” scenario, even though they appear to have been excluded from the traffic modeling exercise. As noted above, the Waze program will direct cars into neighborhoods if there is congestion on the main road (i.e., University Blvd). Also, why would Montgomery Planning consider incurring the major costs of connecting the segments of Gilmore Drive and other streets to carry through-car traffic if it did not believe that such traffic would use the connected street? Note that the existing, disconnected street segments along University Blvd already carry local car traffic.
- *Avoiding the Issue of Increased Neighborhood Traffic.* Montgomery Planning, rather than reveal the scale of cut-through traffic that the UBCP will bring to Four Corners neighborhoods, chose instead to add text to the UBCP that states that if cut-through traffic does emerge, the County would consider restricting parking on residential streets to one side only (enabling a two-way flow of cut-through traffic along narrow streets), painting lines on residential streets, installing speed humps, adding sidewalks, and converting neighborhood streets into connector roads (see <https://montgomeryplanning.org/wp-content/uploads/2025/07/Planning-Board-Draft-Final-7-23-Comm.pdf>, p. 101). This description of possible future actions is not an adequate response, however. First, it is not a commitment. Second, and more importantly, the suggested actions would entail the loss of street parking, more vehicle congestion, more emissions, and more noise as higher traffic streams are accommodated. Some of these steps could even facilitate even more cut-through traffic. The best solution to prevent future cut-through traffic is to not implement the UBCP’s street redesigns and its other neighborhood access provisions.
- *Alternative Proposal.* It would be much better to modify the UBCP to keep existing street disconnects along Gilmore Drive, Greenock Road, and elsewhere. The current intersection at Four Corners should not be modified by reducing lanes. The County could build narrow hard surface bike trails to connect discontinuous street segments, thereby accommodating bicyclists, “rollers,” and walkers but not cut-through cars. Similarly, the development of large apartment buildings at Four Corners and denser housing along University Blvd should be limited to what is allowed in ZTA 25-02. These changes would greatly reduce the UBCP’s implementation cost, help protect Four Corners

neighborhoods from more car traffic, and avoid the need for intrusive future traffic calming efforts.

UBCP Dependence on BRT Service: Almost all the rezoned development proposed in the UBCP is premised on the existence of an efficient and well-utilized University Blvd BRT service to take cars off the road. This hopeful assumption of efficient and widely used mass transit is why the UBCP is proposing that high density development would be clustered around BRT bus stops and why car lanes could be removed from University Blvd. However, no funding for a University Blvd BRT service has yet been identified and several other proposed BRT services in Montgomery County are ahead of it in priority. The Montgomery County Department of Transportation (MCDOT) even advised the Planning Board in a letter sent on March 28, 2025, that “... the BRT [for University Blvd] is, to date, unfunded with no assurance of future funding or a timeline for planning, design, or construction” (see https://montgomeryplanningboard.org/wp-content/uploads/2025/04/University-Blvd-Corridor-Plan_PublicHearingDraft_MCDOT-Comments_Follow-up_3.28.2025.pdf, pp. 1-2). The UBCP is silent about the implications of this problem regarding the future applicability of the UBCP.

- *The UBCP Does Not Provide Contingency Planning Regarding the BRT.* The UBCP provides no information about the consequences to the UBC and surrounding neighborhoods if rezoned properties are developed but the University Blvd BRT is not built, or is severely delayed in being built, or is unsuccessful in terms of passenger usage. Would development of rezoned properties, lane reductions on University Blvd, or street reconfigurations along the UBC be put on hold until the BRT line is built, or would these events be allowed to proceed without the BRT? The latter scenario could overburden the transportation system and cause harm to neighborhoods. In a March 14, 2025, letter to the Planning Board about the UBCP, MCDOT warned that there would be adverse neighborhood traffic effects at Four Corners (associated with the lane reductions on University Blvd) unless “meaningful gains in transit mobility” are in place (see https://montgomeryplanningboard.org/wp-content/uploads/2025/03/Attachment-B_Written-Testimony_updated-3.18.25.pdf, p. 572).
- *BRT Usage May Prove Disappointing.* Even if a BRT service is built on University Blvd, there is no guarantee that significant increases in riders above current numbers of bus riders will use it. Transit is not well suited for many transportation needs that people have (e.g., off-peak travel, doctor’s appointments, shopping for more than a few items, travel on hot, cold, or rainy days). As of the first quarter of 2023, the U.S. 29 Flash Orange and Blue services collectively carried fewer than 2,300 people per day (see

<https://montgomeryplanningboard.org/wp-content/uploads/2025/04/UBC-Work-Session-3-Staff-Memo-Final.pdf>, p. 21)—a small fraction of the 90,000+ people who travel along U.S. Route 29 through Four Corners by car each day (assuming an average of 1.5 occupants per car trip). It is not clear if the U.S. 29 Flash Orange and Blue services even carry as many passengers as did the WMATA Z-11 limited stop bus service they replaced (I could not find this information—it would be helpful to the public if bus ridership data were posted on the internet).

- *The Sequencing of Redevelopment Should Be Specified.* Although Montgomery Planning may not be required to specify the timing of redevelopment within the UBCP, it should clearly state that some recommendations must be implemented (or at least funded for near-term implementation) before other recommendations can go forward. Prior master plans did this.

Major Adverse Impacts on Neighborhood Parking: ZTA 23-10 (Parking, Queuing, and Loading – Calculation of Required Parking (Parking Minimums)) exempts residential property uses from having to provide baseline parking minimums if located within ½ mile of a Metro or Purple Line station, or within ¼ mile of an existing or capitally-funded-for-construction BRT station. ZTA 23-10, which was approved by the County Council in March 2024, creates the real risk that the existing residential neighborhoods along the UBC will be inundated with cars parked by residents of the new buildings authorized by the UBCP.

- *Large Residential Buildings at Four Corners May Lack Sufficient Parking.* Many of the buildings that the UBCP zones for Four Corners will be large structures with major residential components. Each building at Four Corners will be within ¼ mile of an existing U.S. 29 Flash BRT bus stop on U.S. Route 29 and thus will be exempt from providing off-street parking minimums. Unless the developers of these large buildings voluntarily build sufficient off-street parking, residents of these apartments who also own cars (and most of them will) could only park them on nearby interior residential streets that are already crowded with parking. The UBCP contains no discussion of this possible result or its impact on the neighborhoods.
- *Parking Restrictions.* Future efforts endorsed by the UBCP to accommodate large influxes of traffic diverting off of University Blvd onto the narrow streets of Four Corners neighborhoods could cause the County to restrict residential parking to only one side of narrow neighborhood streets (enabling a two-way flow of cut-through cars), reducing available residential parking on these streets by half.
- *Possible Loopholes.* The UBCP allows much denser redevelopment around University Blvd BRT stops northwest of Four Corners, but off-street parking

requirements cannot be exempted under ZTA 23-10 unless the University Blvd BRT is in place or is in the Capital Improvement Program for funding. In the very likely case that the University BRT is not funded due to budgetary problems, it is possible that the Planning Board will determine that existing WMATA metrobus service on University Blvd qualifies as BRT service (the definition of what qualifies as BRT is very loose). In this case, dense building around proposed BRT stops could take place even without a true BRT, and developers of new properties would not have to provide adequate off-street parking, leading to encroachment into neighborhood parking on interior streets by residents of the newly redeveloped, parking-exempted buildings.

Destruction of Local Stores and Amenities: It is ironic that the UBCP, which promotes the goal that residents could walk or bike to nearby places to shop, mail letters, get health care, etc. (the “15 minute living” concept), is threatening to eliminate the Safeway, Post Office, Mary’s Center, Woodmoor Shopping Center, and other amenities that already exist for residents of Four Corners. The UBCP either would upzone the lots of these current stores to induce the replacement of the stores with large, primarily residential buildings, or would eventually push Gilmore Drive through several of these locations to reach U.S. Route 29 and Lexington Drive. Once the existing stores are torn down, there is no guarantee they will be replaced in a timely manner (or at all) with similar services (e.g., a post office or grocery store). Neighborhood residents would be forced to drive or take buses to Georgia Avenue to mail packages or to Wheaton to shop (assuming Wheaton Westview survives—it is currently in a precarious financial position).

Loss of Neighborhood Peace and Quiet during Construction: The large-scale redevelopment proposed in the UBCP for buildings along the UBC, reaching deep into some neighborhoods, and including utility relocations and new street construction, will create many years of construction noise and disruption. Many neighborhood residents are planning to age in place and some of them may not outlive these disruptions. The UBCP ignores the effects of continuous construction activities on community wellbeing.

Failure of the UBCP to Measure Costs Associated with the UBCP: The UBCP proposes extensive changes in the UBC but without any notion of the costs and benefits of the Plan.

- *Budgetary Considerations.* How much will it cost and who will pay to upgrade water, electrical, storm drain, sewer, and street infrastructure to accommodate a 114 percent increase in building density in the UTC? How will the BRT, which is central to the UBCP, be afforded even as several other BRT services are being funded in priority to it?

- *Equity Considerations.* What is the monetary value of costs that existing residents will incur if the UBCP is implemented? These costs are attributable to higher cut-through traffic levels and the associated loss of neighborhood safety, years of disruption caused by nearby construction, reduced quality of life and health from more vehicle emissions and noise, loss of street parking, opening of cul-de-sacs, etc. These costs can be monetized through various methods, including loss of property value, costs to mitigate (e.g., soundproofing, landscaping, adding driveways, etc.). Stores and small businesses will also experience expenses including reduced access to customers, lost sales, etc. (think of the Purple Line in Silver Spring). Residents and businesses should be informed about these costs before they are asked to support the plan. Note that the loss of a cul-de-sac can lower the value of a home on the former cul-de-sac by 5 percent or more—who will compensate these owners?
- *Information about Costs Informs Planning.* With cost information, planners can calculate how much it would cost to add a new dwelling unit in the UBC compared to a new dwelling unit at an already-zoned site elsewhere in the County. If such costs are understood, they would likely reveal that many aspects of the UBCP are not worth pursuing. This information is especially important as we enter a period of reduced Federal, State, and County budgets.
- *Smaller-Scale Investments May Be Adequate.* Whereas much of the UBCP seems either unnecessary or too costly to existing communities, this is not to say that the safety and aesthetics along University Blvd should not be improved. Many residents support the call for wider sidewalks, better bike paths, safer pedestrian crossings, and more tree canopy and green space, etc. If CIP funding is available in the coming years, it should be targeted toward these improvements on a primary basis, particularly given the urgency of such improvements as espoused in the UBCP. Even something as basic as keeping the sidewalks along University Blvd free of debris, weeds, and obstacles would be an improvement over current County practices.

Invalid Argument that the UBCP Does Not Impose Costs on Residents:

Montgomery Planning appears to argue that the UBCP, in and of itself, would not impose uncompensated costs on existing residents for two reasons. First, Montgomery Planning states that such costs would only emerge if redevelopment actually occurred, and the UBCP does not force redevelopment (see <https://montgomeryplanningboard.org/wp-content/uploads/2025/04/UBC-Work-Session-3-Staff-Memo-Final.pdf>, “Neighborhood Street Connections with Redevelopment,” pp. 32-33). Second, Montgomery Planning has argued in at least one public meeting that a property owner who chooses to redevelop under the UBCP does so voluntarily and thereby agrees to the costs and benefits of doing so).

This “solution” to the problem of uncompensated costs associated with the plan is flawed for the following reasons:

- *The Rezoning Needed to Redevelop Properties Is Authorized by the UBCP.* The actions that individual property owners take regarding redevelopment are enabled by the UBCP. In other words, tall multifamily residential buildings at Four Corners are currently not allowed by existing zoning but will be after the UBCP is approved. Similarly, the connection of multiple street segments south of University Blvd into a continuous street is effectively authorized once the County Council approves the UBCP. Thus, the UBCP is ultimately responsible for the adverse consequences on neighborhoods that it makes possible.
- *Actions by One Property Owner May Affect Many Other Residents.* Montgomery Planning cannot evade its responsibility to reveal adverse impacts associated with the UBCP simply by claiming that any such costs are voluntarily accepted by people who choose to redevelop their property or sell their rezoned properties to developers. This is because the decision of a property owner to sell to a developer who then builds a large multifamily property on the purchased land can impose involuntary and uncompensated costs on nearby neighbors and the community at large, including many who do not agree with the seller’s decision to redevelop. In fact, protecting people from the harmful external consequences of other people’s decisions is why property zoning was invented. For instance, the voluntary decisions by a few property owners to sell their homes (perhaps at elevated prices) would enable the County to convert Gilmore Drive into a continuous road from Lorain Avenue to Gabel Street, opening several cul-de-sacs and introducing much more cut-through traffic into residential streets throughout South Four Corners. These decisions by a few property owners would create substantial uncompensated costs associated with increased noise, reduced safety, and lost property values on many hundreds of residents who did not participate in the decisions. Although the street connection project would still require an environmental review to be implemented, the endorsement of the project by the Planning Board and the County Council, evidenced by their approval of the UBCP, would make it very difficult for residents to contest it in the future. They likely would be told that they should have spoken up when the UBCP was being formulated.

The UBCP Will Not Create More Affordable Housing and Appears Biased Against Low Income Residents: Although the need for more affordable housing is a constant theme of political discourse in Montgomery County, the UBCP contributes little if anything to solve this problem.

- *Rezoning Will Lead to More Expensive Replacement Housing.* The substantial cost of purchasing existing homes for redevelopment, plus the high cost of constructing replacement structures, will often lead to replacement housing that

costs more per dwelling unit than the housing it replaces. This is particularly true because some developers looking for affordable properties to purchase and redevelop will be drawn to Naturally Occurring Affordable Housing (NOAH), which is often occupied by lower-income renters. Once acquired, the existing NOAH structure is removed and replaced by two or more dwelling units aimed at higher income purchasers (a more profitable market to build for than low income renters). Possibly because the Planning Board realized that the UBCP will lead to the loss of NOAH, it acknowledges that the UBCP will not be a source of affordable housing by stating that, “In the event of redevelopment, this Plan strives for no net loss of market rate affordable housing” (UBCP Planning Board Draft Summer 2025 at <https://montgomeryplanning.org/wp-content/uploads/2025/07/Planning-Board-Draft-Final-7-23-Comm.pdf>), pp. 77-78). Note that this commitment is only to “strive,” not to accomplish.

- *No Attention to Preserving Diversity.* The UBC has some of the most ethnically and racially diverse neighborhoods in Montgomery County, which itself is home to the three most diverse cities in the United States (see <https://wallethub.com/edu/most-diverse-cities/12690>). This important achievement in diversity should not be taken for granted, yet the UBCP would encourage changes to housing density without any analysis of its effects on racial equity, displacement of low income residents, etc. It seems very likely that the displacement of NOAH for market rate housing will reduce diversity.
- *Single Family Residences Appeal to Many People.* There seems to be an assumption underlying the UBCP that single family residences are inherently biased toward white families, and that eliminating them is good for diversity. This assumption, stemming from the past century when now-illegal land covenants banned minorities from owning land, is not true for the UBC in the 21st century. Any walk through South Four Corners, for instance, reveals people of all racial, ethnic, and religious backgrounds who have sought out the peace, privacy, space, and green yards that single family housing affords.
- *Loss of Services to Low Income Residents.* To redevelop the residential street system near Four Corners to handle more car traffic (i.e., connecting two segments of Gilmore Drive and extending Greenock Road to University Blvd), the UBCP appears to require the elimination of Mary’s Center. Mary’s Center provides health, dental, and other services to many lower income people. The UBCP does not acknowledge the potential loss of Mary’s Center or suggest what, if anything, might replace it.
- *Loss of Accessible Stores.* Whether by upzoning or changing the street grid at Four Corners, the UBCP, if approved, would likely lead to the loss of the Safeway, Post Office, local gas stations, and the shops and services at

Woodmoor Shopping Center, which cater to many residents in the Four Corners neighborhoods. Among these residents are older and lower-income persons who do not own cars and for whom shopping by bus is not practical (see Destruction of Local Stores and Amenities).

- *Impeding the Use of NOAH Properties.* In January 2025, the SFCCA requested that “The Planning Board should provide a detailed map of the length of University Blvd, including through the Four Corners area, that shows an outline of the dwellings on each property, the amount of additional Right of Way (ROW) that the UBCP would use on each property, and the driveways, fences, hedges, or other existing features on each property that would be eliminated” (see SFCCA Letter to PB, January 31, 2025, at https://montgomeryplanningboard.org/wp-content/uploads/2025/03/Attachment-B_Written-Testimony_updated-3.18.25.pdf, p. 26). Montgomery Planning never produced this map. Even so, this encroachment of public spaces into front yards will happen and will harm the existing affordable properties along University Blvd, making them too close to public spaces, or depriving them of their driveways, and therefore forcing sales to developers at reduced values.

Misrepresentation of the Environmental Merits of the UBCP: The UBCP asserts that it will establish a “cool corridor” along the UBC by protecting and increasing the tree canopy, mitigating excess runoff and protecting stream water quality, promoting public health (e.g., providing access to health care facilities), etc. (see UBCP Planning Board Draft Summer 2025, <https://montgomeryplanning.org/wp-content/uploads/2025/07/Planning-Board-Draft-Final-7-23-Comm.pdf>, pp. 89-90). Montgomery Planning has widely publicized these objectives as a means to promote the UBCP to the community. In reality, however, the UBCP could work against many of these objectives. Amy Stevens, Chief, Watershed Restoration Division, Department of Environmental Protection (DEP), wrote a memorandum to Kara Olsen Salazar, Planning Specialist, Department of General Services dated August 4, 2025, warning that some important environmental recommendations in the UBCP will be counterproductive (see https://www.montgomerycountymd.gov/exec/Resources/Files/University_blvd_Corridor-9-2025.pdf, Attachment B):

- “Increasing allowed density and intensity of development along the University Boulevard corridor will almost certainly result in a decrease in tree canopy, [and] an increase in impervious surfaces. Both results will contribute to an increased heat-island effect, which is detrimental to both human health and aquatic and other biological resources. Both changes will also have a negative impact on other environmental factors, such as reduced absorption and infiltration of

stormwater, reduced filtration of air particulate matter, and reduced habitat, among other parameters.”

- “...Although developing a 'cool' corridor is recommended, the suggested housing types will likely lead to more driveways, more parking, and less space for features that contribute to a 'cool' corridor. Minimizing impervious surfaces is mentioned, but will be difficult or impossible to achieve with the recommended changes to housing density.”
- “This section includes beneficial goals and recommendations. Including specifics such as 35% minimum green cover and 50% tree canopy coverage for parking lots is helpful. However, it should be noted that many, if not most properties along the corridor currently have more than 35% green coverage. Setting a minimum of 35% will still likely result in a substantial decrease in green cover.”
- “DEP recommends against zoning a portion of the Breewood Park Neighborhood as Commercial Residential Town, specifically the Pathways School and Northwood Presbyterian Church properties. Being adjacent to Breewood Neighborhood Park, the Breewood tributary, and close to Sligo Creek, it would be highly desirable to maintain or increase forest cover on these properties rather than intensively develop them.”

Last Minute Changes in Zoning with No Time for Consultation: In the Working Sessions held at the Planning Board from late March through June 2025, the Planning Board ordered many significant changes to zoning in the UBCP. No opportunity was provided for public comment on these late changes. When one spectator during Working Session 8 (June 12, 2025) asked where he should submit his comments about the changes announced during the session, he was told he could not do so because the public comment period had closed in March 2025. Among the changes directed by the Planning Board after the public comment period for the UBCP had closed are the following:

- *Aggressive Upzoning at Four Corners.* At the request of the Planning Board, Montgomery Planning made major changes during April through June 2025 to the allowed floor area ratios and heights of buildings at Four Corners. For instance, in January 2025 the Safeway lot was consulted to the public at CRT 2.0 C-1.5 R-1.5 H-60 (up from its present CRT 1.5 C-1.5 R-0.5 H-45), but Montgomery Planning changed this rezoning to CRT 2.25, C-1.5, R-1.5, H-75 in May 2025 and increased it again to CRT 3.0 C-1.5 R-2.5 H-100 in June 2025. Similarly, Montgomery Planning changed the Woodmoor Shopping Center from its present CRT 0.75 C-0.75 R-0.5 H-40 zoning to CRT 2.0 C-1.5 R-1.5 H-60 in the January 2025 UBCP Working Draft and then changed it to CRT 3.0 C-1.5 R-2.5 H-100 in June 2025. Various properties fronting University Blvd and U.S.

Route 29 in North Four Corners were also raised to 100-foot heights in June 2025 from the 60-foot heights originally announced to the public in the January 2025 UBCP Working Draft, etc. These changes could more than double the number of future residents at Four Corners relative to what could occur with the zoning announced for public consultation in January 2025. How do major last minute zoning changes (on which the public was not allowed to comment) represent careful planning matched to an area's attributes and capacity (see *Placement of Large Residential Structures Near Locations of High Vehicle Emissions*)?

- *Insensitivity to Neighborhood Identity.* A late revision by the Planning Board in Working Session 6 on May 22, 2025, removed a recommendation from the January 2025 UBCP Working Draft that Woodmoor Shopping Center should be evaluated for listing in the Master Plan for Historic Preservation. The decision to remove the recommendation was motivated by a concern that it might impede interest in redeveloping the site and because Planning Board members stated that they saw no need to preserve yet another “car-centric” shopping center, even though this center has helped define the Four Corners community for 85 years. No opportunity was provided for the public to comment on this change before the UBCP was sent to the County Council.
- *Last Minute Change to BRT Design.* The UBCP Working Draft announced in the January 2025 that the BRT would operate in mixed traffic through the Four Corners intersection. This recommendation was changed by Montgomery Planning in May 2025 (after the public comment period on the UBCP closed) to call for a dedicated bus lane through the intersection. This change would greatly complicate the traffic flows at Four Corners and could encourage more traffic to divert into neighborhoods.
- *Hiding the Loss of NOAH.* The term NOAH is widely used nationally to identify housing for which the unsubsidized rent is affordable to lower income families. This term was used in the UBCP Working Draft released to the public in January 2025. In June 2025, however, the Planning Board abruptly renamed NOAH to “Affordable Market Rate Housing” in the UBCP with no opportunity for the public to comment on this change. It seems quite possible that this change was made to obfuscate the fact that the UBCP will reduce the supply of NOAH in the UBC as such properties are rezoned and acquired for redevelopment (see *Rezoning Will Lead to More Expensive Housing*).

Need for a Planning Ombudsman: One can raise all the questions one wants about the UBCP, but Montgomery Planning chooses which questions it answers and what constitutes an adequate response.

- *Superficial Responses to Comments.* SFCCA submitted extensive comments questioning many aspects of the UBCP, particularly regarding street redesign, cut-through traffic, and parking (see https://montgomeryplanningboard.org/wp-content/uploads/2025/03/Attachment-B_Written-Testimony_updated-3.18.25.pdf, pp. 24 to 28). The submission of these comments to the Planning Board was approved by a more than 3-to-1 vote ratio among SFCCA members who voted (60 households in total). Unfortunately, Montgomery Planning gave SFCCA's comments only minor treatment in follow up working sessions, and the comments are not addressed in the final UBCP, except to suggest that the unquantified increases in cut-through traffic could be managed by intrusive traffic calming methods within neighborhoods.
- *Lack of Clarity in Presenting Controversial Material.* The extension of Gilmore Drive from Lorain Avenue through to Gabel Street and other street modifications were not clearly revealed in any version of the UBCP (see *The UBCP Lacks Discussion about the Revised Street Network*). Adding to the obfuscation, the text in the UBCP asserted that the connections of segments of the several sections of Gilmore Drive would be for “walking and biking and to provide site access and local circulation” (see <https://montgomeryplanning.org/wp-content/uploads/2025/07/Planning-Board-Draft-Final-7-23-Comm.pdf>, p. 101). Only in very recent briefings (after the UBCP was sent to the County Council) has Montgomery Planning openly acknowledged this new network could be used by cars.
- *Making Changes Outside the Comment Periods.* One means to reduce opposition to a plan is to make major changes to it after the comment period has closed, or to reinsert a controversial provision in the form of a future study (see Last Minute Changes in Zoning with No Time for Consultation and Bad Faith Negotiation on the “Street Grid” Option).

Currently, if one disagrees about whether one's questions have been addressed or fairly represented by Montgomery Planning, all one can do is protest to an overburdened County Council once the plan in question has been submitted for consideration. By this time, it is difficult to make changes to the Plan. On the other hand, if there were an ombudsman at Montgomery Planning who was independent and could intervene if residents could show evidence that the Planning Board and Montgomery Planning are not being fair and responsive, the objectivity of the planning process could be assured as the plan is being developed.

An ombudsman would also be able to help Montgomery Planning push back against unreasonable demands and actions by the five Planning Board commissioners who currently appear to have more power over the fate of neighborhoods than do entire communities of people across Montgomery County. Even if an ombudsman is appointed, however, there is no substitute for a return to

the traditional master planning process if the public credibility of the planning process is to be fully protected (see Need to Re-Establish Traditional Master Plan Process).

Need to Re-Establish Traditional Master Plan Process: In a recent informal meeting, it was noted by a County Councilmember that master plans are almost always approved once they come before the County Council. This success rate likely reflects the fact that before Thrive Montgomery 2050, master plans were developed with the participation of advisory committees consisting of residents, local businesspeople, developers, and representatives of community organizations. These committees, guided and informed by County planning staff, would spend months developing detailed plans reflecting the input of all parties and then would vote on the recommendations. The master plans that the County Council received from this process could readily be approved without much controversy.

Unfortunately, this advisory committee process was not used for the UBCP, even though Thrive Montgomery 2050 promised that growth would be implemented through master plans and sector plans. Instead, after a series of hit-and-miss community listening sessions that most residents did not know about, the planners developed their own plan. Citizens were thereafter simply told what the Planning Department developed under the direction of the five Planning Board commissioners. Most individual residents were then overwhelmed by the 1,000+ pages of materials presented for public review of the plan over a period of a few months—materials which, as noted above, often omitted important information and needed to be verified. To further complicate the UBCP review process, many community members were simultaneously barraged by several other housing/zoning/transportation proposals (i.e., the Attainable Housing Strategies Initiative; the More Housing N.O.W. proposals; and the Flash 29 Phase 2 planning effort). To review all this material thoughtfully requires an individual to spend hundreds of hours of uncompensated personal time reading and doing research—too much of a time commitment for the great majority of citizens. Had citizens with backgrounds in planning, real estate, transportation, and local needs and conditions been allowed to form advisory committees and participate in developing the UBCP from the beginning, it would not be encountering the opposition it currently faces.

Conclusion: There are many things that the UBCP gets wrong. The density of housing it proposes for the UBC is not needed to meet expected population growth in Montgomery County. The UBCP's proposed rezoning far exceeds the much more moderate rezoning promised by the County Council in ZTA 25-02. The UBCP will not establish a "cool corridor" or reduce storm runoff. There are also many ways of improving safety along the corridor that do not involve rezoning 500 properties or diverting potentially thousands of cut-through vehicles into

residential neighborhoods via new street grids. The UBCP would concentrate large residential buildings closely around the congested Four Corners intersection (all within 500 feet of it), exposing thousands of residents to concentrated vehicle emissions. It also would locate smaller multifamily homes within 35 feet of traffic flow along the length of University Blvd, exposing those residents to high emissions as well. The UBCP is premised on the presence of a BRT system that is unlikely to be built for more than a decade, but does not explore what will happen to traffic and mobility if the BRT is not built.

The County Council should not approve the current UBCP but instead should send it back to the Planning Board to be redeveloped through the traditional master plan process. The residents of the UBC are well-versed in issues raised by the draft UBCP and will be available to assist in a more reasonable assessment of the housing, transportation, safety, health, and environmental needs of the corridor. While the UBCP is being redone, ZTA 25-02 will be in place, so there will be no shortage of rezoned properties along University Blvd for developers to work with—perhaps we will learn something from that experience. Similarly, the State’s effort to make University Blvd safer can go ahead as planned, and possible damage that the current UBCP would do to the environment can be forestalled.