

COMMENTS BY ERIC GABLER REQUESTING THAT THE COUNTY COUNCIL DEFER  
ACTION ON ZONING TEXT AMENDMENT (ZTA) 25-12, OVERLAY ZONES –  
UNIVERSITY BOULEVARD (UB) OVERLAY ZONE

Submitted on October 27, 2025, to Inform the October 28, 2025, Meeting of the County Council

My name is Eric Gabler. I am a resident of the South Four Corners neighborhood in Silver Spring. My comments below urge the County Council to defer further consideration of ZTA 25-12 until revisions being made to the University Boulevard Corridor Plan (UBCP) by the Planning, Housing, and Parks (PHP) Committee are completed. I urge this deferral because these changes may significantly change the ZTA now in front of the County Council.

Currently, even as the PHP Committee thoughtfully considers community challenges to the UBCP concerning excessive building heights, zoning redesignations, and traffic intrusions into neighborhoods, more information is emerging that further undermines the justification for the UBCP. This information could cause the PHP Committee to make further changes in the UBCP and the consequent ZTA. For instance:

- Although the UBCP claims that it would develop diverse housing types alongside University Blvd to support a mix of socioeconomic groups, the plan is more likely to harm ethnic and racial diversity and equity. The Office of Legislative Oversight (OLO), in an analysis released on October 22, reports that “Given the high rates of homeownership of Black and Latinx community members in the University Boulevard Corridor (UBC) Plan area, the proposed rezoning that is inherent to ZTA 25-12 could disproportionately displace existing Black and Latinx homeowners for the development of market-rate housing units that primarily benefits White, Asian, and Pacific Islander community members.” Also, unlike the ZTA 25-02, there is no provision for affordable Workforce Housing in the UBCP.
- The same OLO analysis cited above highlights another, hidden provision in the UBCP. In particular, the OLO analysis reveals that a large proportion of CRN housing (duplexes, triplexes, townhouses, and small apartment buildings) enabled by the UBCP would have “by-right” redevelopment authority. Note that the term “by-right” is never mentioned in the UBCP final draft, nor is any assessment made of the impact of large volumes of by-right housing on water, stormwater, and other infrastructure in the corridor area. This impact is likely to be substantial if the frequent water main breaks recently suffered in the South Four Corners area are any indication of the condition of existing infrastructure in the UBC area. Note that ZTA 25-02 specifically does not permit by-right redevelopment but instead requires an Optional Method Development process for this reason.
- Contrary to claims in the UBCP July 2025 final draft, the UBCP would likely not create a “cool corridor” along University Blvd. Montgomery County’s Department of Environmental Protection (DEP) reported on August 4, 2025, that the UBCP would “almost certainly result in a decrease in tree canopy, [and] an increase in impervious surfaces” leading to “an increased heat-island effect, which is detrimental to both human health and aquatic and other biological resources” (see [University blvd Corridor-9-2025.pdf](#)). The DEP also reports in its memorandum that redevelopment of land recommended by the UBCP on University Blvd adjacent to Sligo Creek would harm the

Breewood tributary watershed, even after the County has invested almost \$5 million to protect it.

- The UBCP argues that the rezoning and placement of tall residential structures close to the sides of University Blvd is necessary to make University Blvd safer for pedestrians and other users. The Planning Board asserts that the close-by placement of buildings next to the road creates a tunnel effect that would intimidate cars on University Blvd into slowing down. This safety argument is flawed because the residents of those close-by buildings would experience concentrated vehicle emissions and noise, threatening the residents' health and quality of life. There are many other means to improve the safety of University Blvd that do not involve risks to residents' health. For instance, in November 2025, the Maryland Department of Transportation (MDOT) will provide updates on its MD 193 Pedestrian Safety Action Plan Project, which is not associated with the UBCP (and which the UBCP does not mention). Contrary to the UBCP, the MDOT safety plan will almost certainly not involve: 1) crowding residential buildings against the roadside; 2) creating incentives for car traffic to divert from University Blvd into interior residential neighborhoods; and 3) dependence on a Bus Rapid Transit route on University Blvd that may never be built.

In summary, because of the ongoing revisions to the UBCP, it is premature for the County Council to evaluate ZTA 25-12 or to vote on it. I also believe that continuing efforts by the PHP Committee to revise the UBCP should defer as much as possible to already-initiated efforts to provide more housing and improve safety along the University Blvd Corridor, particularly ZTA 25-02 and the MD 193 Pedestrian Safety Action Plan Project.

Please note that the comments above supplement previous submissions I have made to the County Council in opposition to the UBCP final draft, including comments I transmitted to the Planning, Housing, and Parks (PHP) Committee on October 17, 2025, and to the County Council for its September 10, 2025, hearing on the UBCP.

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