

3 Nov 2025

Dear Council President Stewart, Council Vice President Jawando, and other members of the Montgomery County Council:

I am writing to share information and views regarding the Zoning Text Amendment 25-12 proposed by the Planning Board to create a new University Boulevard (UB) Overlay Zone based on the University Boulevard Corridor Plan (UBCP, or “Plan”). This written correspondence supplements the in-person testimony that I gave at the public hearing on October 28, 2025.

I have lived more than 30 years in Montgomery County, including more than 22 years in the South Four Corners neighborhood that includes University Blvd and a number of properties that would be directly affected by the UBCP. I am a past President of the South Four Corners Citizens Association (SFCCA), and am currently the SFCCA Representative to the Corridor Advisory Committee (CAC) for US 29. I am writing here as an individual resident.

When you approved **ZTA 25-02** just three months ago, you **already upzoned** single family properties that are directly on University Blvd. The justification was to provide a limited percentage of workforce housing when properties redevelop to triplexes and larger multi-family buildings. This ZTA 25-12 changes that zoning in at least two ways: (a) **upzoning entire neighborhood blocks** near University Blvd (not just properties on the Blvd), and (b) using a **CRN zone that would eliminate the workforce housing requirements in ZTA 25-02, and also reduce the setbacks, and reduce the parking requirements**. Please see the chart prepared by the Council Staff for the Planning, Housing, & Parks (PHP) Committee worksession on Sept 29, 2025; it is included at the end of this correspondence.

The Plan has **no affordable housing requirement**, and as stated in the Racial Equity and Social Justice (RESJ) Impact Statement (**bolding** added for emphasis):

The Office of Legislative Oversight (OLO) anticipates **ZTA 25-12 could have a negative impact on racial equity and social justice (RESJ) in the County**. 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.

Another risk with the proposed zoning changes is **incentivizing private investors** to purchase the comparatively affordable houses near the UBC and build expensive rental housing. A report in September by NPR’s *Planet Money*, titled “**Here’s what happens when private equity buys homes in your neighborhood**,” noted that “homeownership has been a primary way that middle-class families build wealth. But now private equity was outbidding aspiring homeowners, making it more expensive to buy a home and pocketing the appreciation in home values.” As shown in the chart at the end of this message, for a consolidated CRN site with >15,000 sq ft, the **allowed lot coverage would increase from 35% to 90%**.

Montgomery Planning conducted a [development pipeline analysis](#) to identify barriers for stalled housing projects that already approved through master plans. That analysis did **not** identify zoning as a barrier. **The Plan's zoning changes are not a solution to address the County's need for affordable housing**, and would eliminate the 'workforce housing' requirement that was the primary justification for ZTA 25-02.

Everyone can support the *aspirational* goals in the UBC Plan, but the **details** and realities **matter**. For example, the August 8 memo from the Deputy Director for Transportation Policy states:

Much of the plan's growth is intended to use and support the University Boulevard Bus Rapid Transit (BRT). In the long term, this is an admirable vision, but we are concerned that this plan's zoning updates may allow this increased density to proceed before the corridor has the infrastructure to fully support it.

As another example, the August 4 memo from the Department of Environmental Protection states:

Increasing allowed density 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 ... 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.

Also:

While the stated goals are commendable, many of the proposed plans may contradict these objectives. Increasing the tree canopy alongside higher development density will be nearly impossible without specific mechanisms to achieve this goal. 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.

For these reasons and more, I urge you to reject the CRN zoning and this ZTA 25-12, and instead **send the entire UBC Plan back to the Planning Board for real impact analysis and community engagement. The trust of the community -- your constituents -- depends on it.**

Thank you for your consideration,

John Holden, Ph.D.  
Silver Spring, Maryland

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From the Council Staff Report for the Planning, Housing, & Parks (PHP) Committee worksession on Sept 29, 2025:

	<b>ZTA 25-02</b>		<b>CRN modified for UBC Plan</b>	
Process	Applied through creation of a new optional method of development		Applied through the master plan process	
Basis for Development Standards	Generally, the standard method of development standards for the applicable building type in the zone		Generally, the standard method of development standards for a duplex build type in the CRN zone	
Applicable Zones	R-40, R-60, R-90 and R-200 zones		R-60 and R-90 zones	
Maximum Density	1.25 FAR		1.0 FAR	
Development Standards	R-60 (duplex)	R-90 (duplex)	CRN (duplex) site <15,000 sf	CRN (duplex) site ≥15,000 sf
Coverage	35%	30%	35%	90%
Lot Area	Ave/Unit 3,000 sf	Ave/Unit 4,500 sf	Min/Unit 500 sf (side by side) 1,000 (one over one)	
Front Setback (min)	25 feet	30 feet	5 feet	
Side Setback (min)	8 feet	8 feet	4 feet	
Rear Setback (min)	20 feet	25 feet	15 feet	
Height	40 feet	40 feet	50 feet	
Parking	Parking – 2 spaces per unit may be reduced by 1 space per unit with Board approval if certain criteria met		Parking – 1 space per unit, area qualifies as a Reduced Parking Area based on transit proximity	