



## Northwood Four Corners Civic Association

November 9, 2025

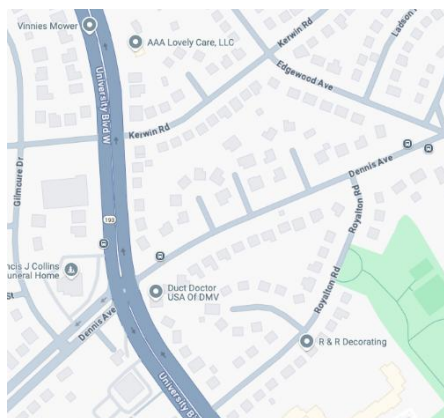
District Council:

Thank you for the opportunity to express the views of the Northwood-Four Corners Civic Association (NFCCA) regarding ZTA 25-12.

Although the community's views on the UBCP recommendations are not unanimous, there is clearly strong concern among many residents that the Commercial Residential Neighborhood (CRN) upzoning recommendations in the University Boulevard Corridor Plan (UBCP) affect far too many properties in the neighborhood.

The proposed Overlay Zone provisions in ZTA 25-12 deal with the rezoning from R-60 or R-90 to CRN under the University Boulevard Corridor Plan (UBCP) that applies to 210 single-family homes in the NFCCA community, of which only 48 properties directly front onto University Boulevard (an additional 15 CRN-designated homes have frontage on Colesville Road.)

The Planning Board's analysis of the University Boulevard Overlay Zone (UBOZ) versus ZTA 25-02 notes on page 6 that "The main difference between the UB Overlay Zone and ZTA 25-02 is that the UB Overlay Zone *slightly broadens (emphasis added)* the eligible area to include residential lots within blocks facing University Boulevard, rather than only specific lots directly facing the boulevard." NFCCA takes strong exception to this characterization.



The UBCP's CRN designation for the Dennis Avenue District penetrates deep into the neighborhood. As you can see in the illustration at left, short street/courts are interspersed along Belton, Kerwin, Dennis, and Royalton, which makes the "block" much larger, penetrating to the middle of the NFCCA community. Some of these homes lie up to 1200 feet away from University Boulevard.

Indeed, the houses on Dennis Avenue and Royalton Road are numbered as two blocks—a 500 block (first block from University Boulevard) and a separate 400 block (closer to Edgewood).

In the Four Corners District, the UBCP recommends CRN for the *second* block away from University Boulevard (bounded by Timberwood, Lorain, and Sutherland Avenues). Although the 15 homes with frontage on Colesville Road are covered by the Housing Now ZTA 25-02, and thus can now be redeveloped as multi-unit homes, the 14 additional homes on the western side of that block do not front either the University Boulevard or Colesville Road corridors. The decision to draw the UBCP boundary to include this area on the second block away from University Boulevard should be beyond the scope of this Corridor Plan.

Members of the PHP Committee have offered several suggestions for changes to the CRN recommendations in the UBCP, but these have yet to be acted upon. These proposed changes are as follows:

- Chair Friedson recommended only the R-60 and R-90 zoned properties that abut University Boulevard be rezoned to CRN 1.0 C-0.0, R-1.0, H-45.
- Councilmember Fani-Gonzalez recommended approval of the Planning Board's proposed CRN zoning with a change in height from 50' to 40'
- Councilmember Jawando recommended the plan reconfirm the R-90 zone for the properties in question.

The UBOZ proposes to standardize the build-to-area to a maximum of 10 feet for development sites 15,000 square feet or larger. Planning board Chairman Artie Harris as well as Planning agency staff have publicly stated that the rationale for a 10-foot front setback as proposed by the OBOZ is that this minimal setback will pull taller buildings closer to the University Boulevard corridor, which will create an effect that will slow drivers down. Whether or not this is a valid psychological outcome, the Overlay Zone applies to all of the CRN-designated homes in the NFCCA area.

Most of the lots in the NFCCA community are much smaller than 15,000 square feet, but the UBCP allows lot consolidation. Many of these homes lie along narrow streets or courts (that intersect with those streets) and do not front on the University Boulevard Corridor. Specifically, this statement applies to the following: Caddington, Eisner, Kerwin, Dennis, and Royalton up to Edgewood Avenue as well as homes on Timberwood, Lorain, and Sutherland.

If consolidated lots are redeveloped within the interior of the community, a 10-foot setback with up to 90 percent lot coverage will visually overwhelm neighboring homes on these interior streets. Furthermore, even today cars negotiate these narrow streets quite slowly and drivers need to carefully ease around parked cars. Also, there is no case to be made that cars speed on courts that intersect these neighborhood streets.

The UBOZ also reduces minimum parking requirements for CRN zoned areas. Although on-street parking is permissible on nearby streets, parked cars *already* reduce passage to a single lane, forcing drivers to find a curb lane space to move into in order to avoid oncoming cars. Adding greater housing density, without requiring parking, will place further demands on scarce parking availability.

ZTA 25-12 does not address height transitioning issues raised by the CRT rezoning recommendations in the UBCP. At one point Planning Agency staff discussed the possibility of applying an overlay zone requirement to angle the roof line for taller structures adjacent to affected homes from the applicable CRT height down to the allowable height limit for CRN-zoned homes. This transition in height at a minimum is needed to preserve livability for abutting homes. Given that redevelopment after adoption of the UBCP will be on an ad hoc property-by-property basis, it is critical that rooflines on taller multi-unit buildings transition to the lower height of nearby existing residential homes.

CRN development under the UBCP is generally “by right” allowing a redeveloper to proceed after filing a building permit. The CRN Duplex standards recommended in the UBOZ only require a site plan if an application is for a project exceeding 10,000 square feet in floor area or exceeding 40 feet in height. Furthermore, an Overlay Zone can be modified in the future without reopening the Master Plan process. Although there is arguably merit in looking for ways to streamline development regulatory processes, this proposal leaves little to no opportunity for the public to weigh in on redevelopment in their community.

Until the PHP Committee finalizes their recommendation with regard to the specific details of the CRN rezoning in the UBCP and the full Council concludes its consideration, NFCCA respectfully urges no further action on ZTA 25-12 as well as an opportunity for another public hearing on ZTA 25-12 as amended to reflect the Council’s ultimate decisions regarding applicable changes to CRN rezoning.

The NFCCA community is a diverse neighborhood with market rate affordable single-family housing. Currently, Zillow valuation estimates for most properties in the Dennis Avenue District range from mid-\$400,000 to mid-\$500,000 (except for a small number of larger infill and substantially renovated units). Although multi-unit property redevelopment may exert downward pressure on home prices by adding to housing supply, it is likely the new homes may be as or more expensive than the housing stock being replaced. Furthermore, there is no requirement for redevelopment under the UBCP to include workforce housing by providing Moderately Priced Dwelling Units.

As stated in its report “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.” OLO’s RESJ report noted other impacts as detailed in the following footnote.<sup>1</sup> However, the OLO report also acknowledges that

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<sup>1</sup> See, Staff report for the ZTA/ overlay zone hearing at [https://montgomerycountymd.granicus.com/MetaViewer.php?view\\_id=169&event\\_id=16628&meta\\_id=205910](https://montgomerycountymd.granicus.com/MetaViewer.php?view_id=169&event_id=16628&meta_id=205910)

As noted elsewhere in the RESJ impact statement:

“[a]llowing multi-family housing in the proposed rezoning area could advance RESJ by eliminating an exclusionary zoning practice [that] increase[s] the cost of housing and make them [sic] unaffordable to many BIPOC residents”. OLO’s recommendations to address RESJ concerns are to: “(1) Engage with Black and Latinx homeowners in UBC Plan area to amend ZTA 25-12; and (2) Adopt policies to prevent displacement of Black and Latinx homeowners in the plan area.”

The Planning Board’s climate assessment report notes that “...the overlay zone will have moderate negative impacts and slight to moderate positive impacts on greenhouse gas emissions. The Quantitative Assessment for the UBC Plan estimates that total greenhouse gas emissions in the University Boulevard Corridor Plan area will be approximately 35% higher at buildout than the emissions from buildout under the existing zoning and previous masterplan recommendations.”<sup>2</sup> Higher emissions levels in the NFCCA community, the UBCP drafters contend, are the tradeoff for lower emission levels countywide because increased housing density in a close-in suburb will reduce overall commuting miles traveled and emissions per household should be lower in smaller, higher density homes.

Restoring and improving tree canopy and green space must be prioritized in the application of any new zoning. The Montgomery County Department of Environmental Protection noted that “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

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- Today, the UBC Plan area is a racially and ethnically diverse community of nearly 10,000 community members; compared to the County, Black and Latinx community members are overrepresented in the Plan area.
  - The UBC Plan area is primarily a single-family home community where most community members are homeowners. The rates of homeownership for Black and Latinx community members in the Plan area are much higher than in the County overall.
  - The UBC Plan notes the “Plan area is characterized by its general affordability compared with the County as a whole in sales prices, rents, and the large amount of housing stock that is income-restricted.” Of note, tear down projects that replace older, more affordable single-family homes with newer, more expensive ones are not common in the Plan area.
  - Allowing multi-family housing in the proposed rezoning area could also adversely impact RESJ by encouraging the development of market-rate multi-family housing that could disproportionately displace existing Black and Latinx homeowners. A market analysis for the UBC Plan found that in the short- to mid-term, redevelopment in the rezoning area would most likely result in duplexes and stacked/piggyback townhouses. Thus, new multi-family housing development in the rezoning area would likely consist of smaller scale market-rate developments that do not require moderately-priced dwelling units (MPDUs).

<sup>2</sup> The Draft Climate Assessment for ZTA 25-12, Overlay Zones—University Boulevard.

parameters.<sup>3</sup> Notably, it should be pointed out that the NFCCA community borders the Northwest Branch, which feeds into the Anacostia River.

Thank you for reviewing these comments and concerns. The NFCCA requests that this statement be included in the public hearing record for ZTA 25-12.

Respectfully,  
Sharon Canavan  
President,  
Northwood Four Corners Civic Association

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<sup>3</sup> Memorandum dated August 4, 2025 from Amy Stevens, Chief, Watershed Restoration Division, Department of Environmental Protection, Montgomery County to Kara Olsen Salazar, Planning Specialist, Department of General Services.