



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

MEMORANDUM

September 2, 2025

TO: Kate Stewart, President
Montgomery County Council

FROM: Marc Elrich, County Executive 

SUBJECT: Transmittal of Comments on the University Boulevard Corridor Plan

Pursuant to Sec. 33A-7 of the County Code, I am submitting Executive's comments on the University Boulevard Corridor Plan (UBCP). Following are my overall comments and highlights from the departmental comments and recommendations found in the attachments: MCDOT (Attachment A); DEP (Attachment B); and DPS (Attachment C). DHCA comments on the Planning Board draft will be referenced in this memo. The Fiscal Impact Statement will be sent separately. Representatives from the departments are available to respond to questions and will attend forthcoming committee and Council meetings.

First, it is imperative to note that Corridor Planning is a concept introduced in Thrive Montgomery 2050 without sufficient details for residents to understand what it would mean to their neighborhoods.

Corridor Planning is Antithetical to the Recommendations of the General Plan, Thrive Montgomery 2050.

The University Boulevard Corridor Plan is the first corridor plan to be implemented after the passage of Thrive 2050, the General Plan approved by the prior County Council in 2022. While the corridors concept was introduced in Thrive, there was no mention that corridor planning would **replace** the master plan process. In fact, the introduction to Thrive clearly lays out the importance of master plans:

“...Thrive Montgomery 2050 will inform future master and functional plans. Master plans (or area master plans or sector plans) are long-term planning documents for a specific place or geographic area of the county. All master plans are amendments to the General Plan. They provide detailed land use and zoning recommendations for specific

areas of the county. They also address transportation, the natural environment, urban design, historic resources, affordable housing, economic development, public facilities, and implementation techniques. Many of Thrive Montgomery 2050's recommendations cannot be implemented with a one-size-fits-all approach. Area master plans will help refine Thrive Montgomery 2050 recommendations and implement them at a scale tailored to specific neighborhoods.” (Thrive Montgomery 2050, Approved and Adopted, [THRIVE-Approved-Adopted-Final.pdf](#), pg. 4)

Unfortunately, this Corridor Plan ignores the master plan process outlined in Thrive. It is focused solely on producing as much housing as possible without adequately addressing the other essential elements of a master plan. Its focus on only part of a road explains why the boundaries have proven so controversial. The narrow, artificial boundaries not only divide and truncate established neighborhoods but also undermine any analysis of the other essential elements of a master plan. The area of study is so small that it is impossible to assess accurately school overcrowding, transportation adequacy, or park deficits. It is so irregular that it is impossible to envision a new, improved community that stimulates economic growth and fifteen-minute living, all goals of Thrive 2050. This is contrary to successful master plan processes - as Thrive correctly lays out, it is the master plan process that is designed to address comprehensive future growth for a specific area of the county.

Corridor planning in general – and the University Boulevard Corridor Plan, specifically – ignores existing area master and sector plans, does not consider community amenities like parks and community centers and libraries, and even ignores the 23 designated activity centers in the county.

Community-Based Planning eliminated as a division and as a process

Historically, the community-based planning division of the Planning Department led on master plans. They worked with advisory boards that included residents and business representatives and, often, environmental and other organizations. The other divisions such as transportation and environment provided technical information as part of the master plan process. In general, staff served to provide information rather than dictate the outcome to the community.

Everything that we are so proud of about Montgomery County was built with the community: the community was not the enemy. That is no longer true; residents now feel ignored and dismissed, and the zoning and plans are worse because of it.

Corridor Planning is Based on a False Premise.

The University Boulevard Corridor Plan is the first of the corridor plans and therefore is an indicator of corridor planning in general. This process assumes that increasing density through zoning changes is essential to addressing the need for more affordable housing in the county. This is a false premise.

Existing approved master plans already have zoning potential for approximately 125,000 units, which would accommodate about 300,000 new residents. This number is well beyond the forecast of future residents: 200,000 more expected over the next 25 years. In other words, the zoning capacity of housing units far exceeds the number who are coming here. Some may suggest that if more units are built, then more people will come here, but that is not how it works. The forecast has proven to be generally accurate for the number of future residents. Given this reality, upzoning additional areas will simply change the location of development; it will not bring more people. Corridor plans that provide additional density opportunities will draw density and development away from other important master planned areas like Wheaton. Wheaton, the nearest master planned area to the University Boulevard Corridor Plan, has not developed as it should have. It has been over-zoned for high-rise, and it likely needs a reconsideration of its zoning. Planning should focus on building out in Wheaton, which is immediately adjacent to metro rail and a bus hub, rather than moving development further from transit. Drawing housing away from Wheaton deprives Wheaton of housing closest to transit, which is the top priority. And this is true for all the sector plans and activity centers, which were predicated on being focuses of growth. To the extent that the growth moves to the corridors, it does not happen where we planned it.

The upzoning of the University Boulevard corridor incentivizes incoherent functionality, where development is random and arbitrary, generated not by infrastructure improvements, but by “property owners’ initiative to pursue infill development or redevelopment” (UBCP, p. 10.) That is, it is dependent on developers buying blocks of property, since one single-family lot wouldn’t provide sufficient space to redevelop. This consolidation will in turn inflate the prices of surrounding single-family homes, increase the price of development, and work against the goals of affordable housing.

Advocates for upzoning residential areas point to Minneapolis and Arlington as models that eliminated single family zoning, but those areas are not comparable to Montgomery County, where existing zoning can accommodate future growth. In those jurisdictions, they had no place to grow within their existing zoning. To accommodate what they believed could be their future growth potential, constrained by the built environment that existed, rezoning was their only option. As people like to say, you can’t just invent new land.

Given that Montgomery County does not need additional zoning to accommodate future residents, this is a plan to let developers go after existing neighborhoods by creating a false sense that there’s nowhere else left to develop. In October 2019, the Executive Director of the Metropolitan Washington Council of Governments (MWCOG) confirmed that “The results of this initial assessment confirmed that the region can accommodate – within existing comprehensive plans and zoning – significantly more housing than the additional 100,000 units called for in the Board directive. In April, the Planning Directors reported that they had further determined that all the additional housing could be accommodated within the region’s Activity Centers and around planned network of high-capacity transit areas.”

Comments specific to the Planning Board Draft of the University Boulevard Corridor Plan

1. This plan is based on a Bus Rapid Transit (BRT) line that does not exist and is not even in the planning stage.

According to the Planning Board Draft, the Plan proposes amending parts of three different existing master plans, a functional master plan, the Master Plan of Highways and Transitways, the Bicycle and Pedestrian Master Plans, the Master Plan for Historic Preservation, and Thrive Montgomery. It envisions “transforming approximately 3.5 miles of University Boulevard into a pedestrian-oriented and multimodal corridor that supports safe movement for all people, especially those walking, biking, and rolling.” (pg. 6) It also states that it envisions “a more compact, corridor-focused land use pattern that concentrates future development along University Boulevard and near five planned bus rapid transit (BRT) stations, consistent with Thrive’s vision for growth corridors,” along with rezonings of existing residential, institutional, and single-use commercial properties intended to accommodate “a range of building types between planned BRT stations and higher density, mixed-use development near planned stations.” Page 7 of the Plan says: “The investment in public infrastructure, specifically the future BRT along University Boulevard, will provide new mobility options for residents and employees within the Plan area.”

Here is the fact that is ignored throughout this Plan: BRT on University Boulevard is not even in an initial planning stage. There is no facility plan for it, no funding identified in the Capital budget – even in the beyond six-year window, no guarantee that the five BRT stops central to the Plan will be built. Prior master plans used staging, which conditioned development on the related infrastructure – in this case – the BRT route. Those master plans generally did not allow the increased development until the infrastructure was at least in the capital budget.

Based on the uncertainty of BRT on University Boulevard, the impacts on existing traffic and traffic patterns must be carefully reviewed and considered. The plan lays out “near-term” and “long-term” recommendations for the immediate area that could have significant impacts on residents and existing businesses in the surrounding area. Currently, long lines back up along Colesville Road for entrance on to the beltway; some of the Plan’s proposed changes could drastically exacerbate the situation and those consequences must be clearly and carefully laid out. The only discussion of the impacts on existing traffic is in Appendix F, which is not attached or even referenced in the draft itself. Furthermore, the narrow arbitrary boundaries of the UBCP do not include enough of the road network to assess the consequences of changes to University Boulevard on other roads.

I am very concerned about the lack of specificity on the impact of the proposed realignment of streets and connection of streets discussed on page 101. The realignments would necessitate several new signaled intersections on University Boulevard, while the proposed street connections would convert dead-end streets into through streets conducive to cut-through traffic. **The impacts of these changes are not analyzed or addressed, not even in the appendix.**

MCDOT offer comments in Attachment A. The memo acknowledges that the long-term vision to support BRT is positive; however, it underlines the concern that the zoning changes allow density to proceed well before the infrastructure necessary to support it. It points out that the University Boulevard BRT has not entered facility planning, nor is there committed funding in the Capital Improvement Program (CIP). DOT recommends that zoning changes proceed concurrently with funding for additional investments in the corridor. And while they are supportive of the transit lanes proposed for Four Corners, they note that they have not yet performed any analyses for the University Boulevard BRT, which might produce alternative options for achieving multimodal safety and furthering the goals of the Climate Action Plan without continuous bus lanes. In other words, the proposed significant changes in the Plan to accommodate BRT may be better accomplished in an alternative fashion that has fewer deleterious effects on local traffic and business.

2. This plan does not follow the master plan process, which would incorporate local residents and businesses, and cover a cohesive area.

The residents who live on or near University Boulevard – a diverse population, many of whom live in naturally occurring affordable homes – have come out in record numbers to voice their opposition to this Plan. For more than a year, they have attended public hearings and meetings and sent emails and letters to voice their concerns. As reported in Bethesda Magazine, 72 people presented in-person testimony at the Planning Board’s public hearing in March 2025 while more than 1,100 residents watched online, the vast majority of whom voiced their opposition to the Plan. <https://bethesdamagazine.com/2025/03/03/silver-spring-residents-voice-major-opposition-to-university-boulevard-corridor-plan/>.

In the past, Master Plan committees were created, comprised of residents and local businesses and developers along with community groups. They spent months developing the detailed plans that reflected the input of all parties, and the recommendations were voted on by the body – a process that produced a plan that inspired a level of confidence that communities had been engaged. The role of planning staff was to help guide and inform the process. The Planning Board has destroyed that process, replacing it with minimal community involvement and no meaningful role in decision making. Historically, planning staff helped residents with the planning process rather than dictating to them what would happen.

Residents’ concerns either have not been heard or have been dismissed, with one notable exception. In July 2025, Council Member Natali Fani-Gonzalez wrote a letter to her colleagues on the Council’s Planning, Housing, and Parks Committee stating that she believes the existing zoning on the Kemp Mill Shopping Center “is great as it is” and should be retained. This followed a community meeting she held, attended by more than 300 people after which she wrote that the Shopping Center is “a wonderful, unique asset” and “truly the heart of this community.” Her recommendation is to remove the Shopping Center from the Plan boundary. While it is positive that CM Fani-Gonzalez listened to these residents, it highlights the fact that

the Planning Board, with all its assurances that residents had a voice, did not address the issues raised by the Kemp Mill community in the Plan sent to the Council, even though they heard from the same people from the same community who voiced the same concerns. Other communities in the University Boulevard area have raised concerns about how the Plan will impact where they live, but they have been dismissed by planners who think their “vision” of the Plan is the way to go. There is great frustration throughout the County with a planning process that now dictates what’s best for communities while not engaging them in serious, in-depth conversations.

3. This plan’s recommended zoning directly conflicts with the recently passed ZTA 25-02, adding to the ongoing confusion around housing proposals.

When the Council recently adopted ZTA 25-02, Workforce Housing – Development Standards and its companion Subdivision Regulation Amendment, residents were assured that, contrary to the wildly unpopular Attainable Housing proposal, this ZTA would not rezone single-family residential properties countywide; instead, it would allow additional residential building types on properties fronting certain corridors without changing the underlying zone. This was intended to allay residents’ concerns about the potential reach of redevelopment beyond properties fronting the corridors.

But nothing lasts forever. Now, just weeks later, the University Boulevard Corridor Plan proposes rezoning the predominantly R-60, R-90, and R-200 neighborhoods within the Plan boundary to the CRN zone (see maps on pages 27-28). In combination with a proposed overlay zone, the Plan dispenses with the assurances afforded under the ZTA by proposing rezoning that reaches beyond corridor-fronting properties and bifurcates established neighborhoods, leaving some sections in an existing master plan area and moving other sections into the University Boulevard Corridor Plan area. The map on page 17 of the draft illustrates that 11 different neighborhoods are chopped up.

4. Housing: This plan incentivizes the disappearance of existing naturally affordable housing and the displacement of residents who live there now, especially renters.

Both the ZTA and the corridor plan concept propose changes deemed necessary to “meet the growing demand for housing” (pg. 78) with the total number of housing units taking precedence over affordability. There is actually a declining demand for housing. The most recent COG Forecast reduced the estimate for Montgomery County by almost 6,000 units from the original 2030 forecast. Growth locally and regionally is expected to slow, not grow, and, as we noted earlier, we already have all the capacity we need in our master plans to accommodate it.

The Plan notes that the University Boulevard area “is home to around 3,400 housing units, with a range of housing types including detached, attached, and multifamily units.” And while it says that 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” (page 77), it does not prioritize the preservation of currently affordable homes. It is perverse that

the first target of the corridor plan concept is one of the most affordable ownership areas in county, with a mix of housing types.

Recommendations aimed at increasing housing affordability and supply in the University Boulevard corridor are found on page 80. While the Plan outlines possible strategies regarding affordable housing, it does not require a “no net loss” along with an **increase** in affordable housing. Instead, it is “aiming to balance the preservation of existing naturally occurring affordable housing with the production of new housing.” Note that it is the production of housing, not the production of affordable housing. And it recommends “preserve existing market rate affordable housing where practicable, striving for no net loss of market rate affordable housing in the event of redevelopment.” No net loss should be a starting point, not a “nice-to-have.”

The conflicting nature of these two policy goals – redevelopment and no net loss – is not addressed in the Plan, which adds capacity for an additional 4,000 residential units, more than double the existing number. It states that the zoning changes are intended to provide property owners with “more flexibility” for what they can build on their properties if they choose to redevelop, making it clear that redevelopment is the underlying premise of the Plan – not only for individually owned residential properties, including assemblage, but also for religious and institutional properties. The Plan’s recommendations for affordable housing are either minimal improvement (15% MPDUs) or simply suggestions, not requirements. Only rezoning is required. What exists in the area now is what we need, but what is proposed reduces that and replaces it with market-rate housing. The small number of required affordable units also does not match the needs of future households’ income levels. Again, from COG, demographics indicate that of the next 30,000 households, half would have incomes below \$50,000, a fourth between \$50-75,000 and the last fourth above \$75,000. This begs the question of who we are planning for.

These recommendations are being made at a time when residential property zoning changes around the country are being analyzed to see whether they result in more affordable housing. Increasingly, experience indicates that they do not. Here is an abstract from a University of Virginia Law School research paper by Richard Schragger and Sarah New:

It is commonly assumed that local land use regulations—and especially single-family and other restrictive zoning classifications—limit housing supply and thus increase housing costs. This view assumes that absent restrictive regulations, landowners will respond to rising prices by building more homes. This study of Charlottesville, Virginia—a small, high-demand city experiencing high housing costs—uncovers significant underdevelopment of parcels under current zoning classifications, however. Under the zoning code that governed local land use through 2023, Charlottesville’s residential districts could have accommodated significantly more housing units – production that went unused and remains untapped. That finding suggests that the conventional story about the effects of local land use regulations on landowner behavior is not

straightforward, that zoning classifications may not be the primary constraint on housing supply, and that the elimination of restrictive zoning, absent other interventions, may have relatively small effects on housing supply and/or affordability in a given jurisdiction. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4794807

Professors Genesh Sitaraman and Christopher Serkin at Vanderbilt Law School have also argued that zoning is not the solution for affordable housing:

But the obsession with zoning is conceptually flawed, descriptively problematic in that it ignores or obscures the many other causes of the affordability crisis, and potentially perverse by promoting solutions that, in some cases, may be ineffective and even harmful. Indeed, at the extreme, those who are laser-focused on zoning are falling back into a neoliberal paradigm that makes overly simplistic assumptions about markets. ([Post-Neoliberal Housing Policy by Ganesh Sitaraman, Christopher Serkin :: SSRN](#))

Residents commenting on the University Boulevard Corridor Plan repeatedly pointed out that increased land values resulting from rezoning would likely lead to the displacement of renters currently living in the single-family homes along the corridor, and the replacement of neighborhood-serving businesses located in some of those homes or in small commercial centers, as well as the possible loss of prized religious and institutional uses. The Kemp Mill community was not the only one expressing alarm over the redevelopment of their cherished shopping center. Woodmoor residents similarly pointed out that redevelopment of the Woodmoor Center at Four Corners would replace valued neighborhood businesses. They remain confused about the historic status of the Center, described on page 70 as having been built in 1937, with various additions but with its architectural form and design still intact. Their understanding is that the Center was previously recommended for evaluation for listing in the Master Plan for Historic Preservation. The chapter on historic resources beginning on page 134 makes no mention of evaluating the Center; instead, it recommends redevelopment in the CRT zone with a height of 100' adjacent to a single-family residential neighborhood.

5. The Environment: This plan will inevitably result in reduced tree coverage and increased imperviousness, contrary to climate change goals.

Key environmental recommendations in the Plan are found on pages 89-90. To summarize, the Plan hopes for a “Cool Corridor”, underground utilities, a tree canopy of at least 50% on private and public parking lots, and a minimum of 35% green cover on newly developed or redeveloped properties. DEP shares detailed comments in Attachment B, summarized here:

- Increasing allowed density and intensity of development along the corridor will almost certainly result in a decrease in tree canopy and an increase in impervious surfaces, resulting in an increased heat-island effect detrimental to humans and aquatic and other biological resources.

- This will produce a negative impact on other environmental factors, such as reduced absorption and infiltration of stormwater, reduced filtration of air particulate matter, and reduced habitat.
- These factors are discussed at greater length in DEP's analysis of Chapters 1, 4, 5, 7, and 8.

Per the Climate Action Plan that identified increased risks of flooding due to climate change, the County is currently conducting an in-depth study countywide, to identify risk, the need for infrastructure and regulatory changes, and individual residents' actions necessary to deal with increasingly frequent and intense storms. Sligo Creek watershed, which extends along a portion of University Boulevard, is the first one to be modeled, with results to be released soon. There are flood risk areas, our current storm drain systems are inadequate, and we cannot build our way out of these problems, especially with recent reductions in infrastructure funding. Many of the solutions will take time, but what we can do now is to adopt land-use plans that address these problems. **At the very least, plans should do no harm.** I see no evidence that the Plan has considered which areas along the corridor are at risk of flooding, and as described above, DEP has signaled that the proposed intensification of land uses will exacerbate the problems.

We are not alone in our concerns. Arlington County recently announced plans to explore potentially tighter regulations of impervious surfaces in their low-density residential neighborhoods, citing incremental changes to properties that increase the risk of flooding and create more intense heat in surrounding areas. <https://www.arlnow.com/2025/08/20/arlington-plans-public-outreach-on-rules-for-impermeable-surfaces-at-single-family-homes/> We should be considering these issues now instead of proceeding on a glide path to approve corridor plans that are antithetical to good planning.

6. Fiscal impact is likely under calculated and large.

While I have long advocated that investments in infrastructure are important for the future of the county, this Plan does not direct or consider the infrastructure improvements in a priority fashion.

7. Clarification on Permitting Issues

The Department of Permitting Services memo (Attachment C) identifies two areas of concern. It cites the vague language in Chapter 8 – Housing, noting that all new construction will be subject to the applicable codes; and it asks for more specificity and clarity in Chapter 7 – Environmental Sustainability regarding tree protection.

Closing Comments

As I stated in my memo to the Planning Board, although there is no language in Thrive Montgomery 2050 that suggests replacing the master plan process with corridor plans, we are told that the University Boulevard Corridor Plan is the first of many, each one focused almost solely on producing as much housing as possible within the ranges of three typologies, and without addressing the other multiple criteria articulated in Thrive that make a community a complete community. The broad brushes of the Plan do not reflect the differences in neighborhoods and the value of community-serving businesses and ignore the reality that the housing that will result will be priced out of reach for many residents currently living there.

This quest for additional housing pretends that absent zoning changes we have no place for residential growth. It ignores all of the unbuilt units that previous councils have planned for – explicitly to accommodate future growth. If the Planning Board believes housing types are the issue, they have a painless way to find out. They could reexamine those Master Plans that have not been significantly built out, reconfigure the housing elements by changing some of the zoning to favor duplexes, triplexes, quads and small apartments, and see whether those changes accelerate housing production. They could also evaluate the Planning Board's over-use of high-rise zoning which has stifled development. To that point, developers have requested plan changes in White Flint 2, changes initially opposed by planning staff, that would allow them to build townhouses and lower apartments because, as they said, there's no market for the high-rises. Similarly, they could look at their own report on the lack of development in White Flint, where the developers told them they could not get high enough rents. More plainly, there isn't a market for the units they want to build at the price they want to build them. Overzoning has created price pressures by raising the price of land, making it too expensive to build lower density projects.

Most residents are very supportive of efforts to increase housing affordability for those who live in or wish to live in the County. They just want us to find a way to get there without adopting plans that exacerbate traffic jams on roads, overcrowd our schools, damage the environment, increase flooding risks, and overtax County services and infrastructure. They see who benefits from these land use decisions and they know it isn't them. And they are tired of being dismissed as NIMBYs. There is a better way to plan. A good start would be to reject the University Boulevard Corridor Plan, rethink what makes sense and what doesn't, and get back to a more inclusive planning process than currently exists.

I listened to Council discussions about Thrive and no one from the Planning Board or the Council ever told residents that with this tool we will enable developers to go into existing neighborhoods, buy up blocks of housing, and double the density and introduce commercial uses to the interior of quiet suburban neighborhoods. Residents didn't see this coming – it's not surprising that they are not happy.

Enclosures: Attachment A – Department of Transportation Comments
 Attachment B – Department of Environmental Protection Comments
 Attachment C – Department of Permitting Services Comments

cc: Cecily Thorne, Chief of Staff to the Council President, Montgomery County Council
 Craig Howard, Executive Director, Montgomery County Council
 Pamela Dunn, Senior Legislative Analyst, Montgomery County Council
 Richard S. Madaleno, Chief Administrative Officer
 Ken Hartman-Espada, Assistant Chief Administrative Officer
 Tricia Swanson, Director of Strategic Partnerships
 Debbie Spielberg, Special Assistant, Office of the County Executive
 Claire Iseli, Special Assistant, Office of the County Executive
 Meredith Wellington, Policy Analyst, Office of the County Executive

Attachment A



DEPARTMENT OF TRANSPORTATION

Marc Elrich
County Executive

Christopher R. Conklin
Director


MEMORANDUM

August 8, 2025

TO: Greg Ossont, Deputy Director
Department of General Services

FROM: Haley Peckett, Deputy Director for Transportation Policy
Department of Transportation

SUBJECT: University Boulevard Corridor Plan
Planning Board Draft – Executive Branch Comments


Haley Peckett (Aug 7, 2025 16:14:06 EDT)

Thank you for the opportunity to review the Planning Board Draft of the University Boulevard Corridor Plan. In addition to the detailed technical comments attached, we would like to highlight several more significant issues. In the items below, footnotes identify the associated comment number in the attached detailed technical comments:

- 1) **TRANSPORTATION & DENSITY:**³ 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. The University Boulevard BRT has not entered facility planning, nor has it any committed funding in the current Capital Improvement Program (CIP). The Montgomery County Department of Transportation (MCDOT) recommends that the zoning changes proceed concurrently with funding for additional investments in the corridor to ensure it is capable of supporting the new growth.
- 2) **TRANSIT LANES IN FOUR CORNERS:** We are supportive of the Planning Board's recommendation to include the bus lanes along the length of the corridor, including through Four Corners. Planning for bus lanes is among our top priorities through Four Corners as this corridor already carries some of the highest passenger volumes in Maryland and provides important regional connectivity. These lanes will support other goals of the plan by making transit more reliable and desirable, helping to shift trips from private vehicles to transit, supporting multimodal safety, and furthering goals of the

Office of the Director

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Climate Action Plan. We note, however, that as we have not yet performed any analyses for the University Boulevard BRT, further study may find alternative options for achieving these benefits without the provision of continuous bus lanes.

- 3) **BRT-LED EFFORTS:** The Plan proposes additional items (driveway consolidation¹ and studying the long-term road network realignment²) be added to the University Blvd BRT facility planning effort. The purpose, need, and timeline of these additional items differ from the scope of the BRT. MCDOT requests that these items not be tasked to the BRT efforts to ensure that BRT can be delivered without incurring unnecessary costs, delays, and complexity.
- 4) **STATUS OF EXISTING BUS LANES:**¹⁷ The University Boulevard bus lanes, a pilot implemented in partnership with Maryland State Highway Administration (SHA), were installed in February 2024 and evaluated over the following year. This pilot was fully independent of the Corridor Plan. However, MCDOT anticipates that public comments intended for the Corridor Plan will reference the bus lanes. SHA made these lanes permanent in May 2025, based on marked improvements to bus travel times and reliability. MCDOT's website includes project updates and evaluation data. MCDOT can provide additional information to Council upon request.

Enclosure: Detailed Comments

cc: Ken Hartman-Espada, Assistant Chief Administrative Officer, Office of the County Executive
Debbie Spielberg, Special Assistant to the County Executive, Office of the County Executive
Claire Iseli, Special Assistant to the County Executive, Office of the County Executive
Meredith Wellington, Planning Policy Analyst, Office of the County Executive
Christopher Conklin, Director, Department of Transportation
Andrew Bossi, Senior Engineer, Transportation Policy, Department of Transportation
Kara Olsen-Salazar, Planning Specialist, Department of General Services

0	Team	Commenter	Page	Summary	Comment
1	VZ	WH	9, 102	BRT & Driveway Impacts	<p>RE: p9 1st Bulley p102 2nd black bullet</p> <p>Conditioning BRT to "consolidate, remove, or relocate driveways" is not the primary purpose of BRT. These activities might occur as needed to safely operate the BRT and improve accessibility, but should not expand the scope in this manner.</p> <p>This also risks negative perception of BRT if people think it will inevitably affect their home's or business's access.</p> <p>On both p9 and p102 remove "or implementation of BRT"</p>
2	Policy	HP, SCP, ADB	9, 112-114	BRT & Long-Term Grid	<p>RE: p9, Transportation section, last bullet Also p112-114</p> <p>We suggest the following edits:</p> <ul style="list-style-type: none"> - On p9, last bullet, delete "Along with a more detailed design for BRT," from the last sentence. - On p114, adding this line to the last paragraph: "The future study should also consider the importance of this corridor for bus transit and the status of bus priority or BRT improvements, and all recommendations should integrate temporary improvements to maintain transit mobility." <p>Rationale:</p> <p>There has been substantial negative public response to the proposed road network realignment. While much of the opposition has centered on issues that are relatively unrelated to the realignment itself, and on issues that can likely be addressed, it is important not to conflate the effort together with BRT.</p> <p>Both efforts need to acknowledge each other, but having BRT take the lead in a "blank slate" reimagining of Four Corners will complicate and delay the BRT effort. These are two completely different projects with different purposes, different needs, different timelines, and different scopes.</p> <p>The long-term network realignment must be a fully separate effort from the nearer-term BRT project. That study would then consider the long-term configuration and means of implementation, including laying out high-level right-of-way needs. We suggest that this study occur after the Univ Blvd BRT in Four Corners has completed design & been funded for construction, so that it may be considered a background project in the study of long-term needs.</p>

0	Team	Commenter	Page	Summary	Comment
3	Policy	ADB	23-74	Zoning - Transpo Nexus	Consider some connection between expanded density and implementation of BRT, such as construction funding programmed within the 6-year CIP. This would help support the intended nexus of the Growth Corridor between density and non-auto mobility.
4	Policy	ADB	97	Brunett Ave	<p>Figure 68 - The 4' sidewalks are sub-standard and not compliant with our application of ADA.</p> <p>The 5' Planting Strips are also substandard, though that's just a matter of policy rather than law, so it's not as much a deal-breaker.</p> <p>I recognize this cross-section's peculiarities are likely reflecting on-the-ground conditions, and in practice we expect to use a more acceptable design, but the master plan should be laying out the ideal long-term vision.</p>
5	VZ	WH	99	Top 10 vs Top 5	2nd Paragraph, 4th Line - Should read top 10 instead of top 5
6	DO, Transit, BRT, Policy	HP, AW, JC, JH, JT, SCP, ADB	108-111	Transit Lanes	<p>RE: Figures 75 through 81</p> <p>Bus lanes need a minimum 12' travel lane, whereas the plan currently shows 11'</p> <p>This will likely be resolved at implementation by narrowing the Active Zone by 1' or by conditioning an additional +1' of ROW/easements with any redevelopments along these segments. But it would be ideal for the master plan to reflect what will likely be the reality at implementation.</p>
7	Policy	ADB	115	Inadvertent Note	There's a PDF comment/note inadvertently left in the file at the top of p115
8	BRT, Policy	JT, ADB	115-116	Table Formatting	<p>(JT) Table 1 was split into two pages. The table on the second page does not have street names and segments like the first page, which makes it hard to discern the information, such as existing lanes and proposed lanes etc.</p> <p>(ADB) Either...</p> <ul style="list-style-type: none"> - Add a blank page between before Table 1 so that these align across a two-page spread. - Shrink the columns so that the width fits fully within a page, then break up the table vertically across several pages (as has been done with all previous plans). Consider Landscape format for these pages.
9	BRT	JT	115-116	Existing Traffic Lanes	Table 1 - Colesville Road within the Four Corners Town Center boundary (Timberwood Ave to Lanark Way) has 8 existing lanes instead of 6 lanes
10	BRT	JT	115-116	Existing Traffic Lanes	Table 1 - Colesville Road within the Town Center southern boundary to planning area boundary (460' south of Lanark Way) has 8 lanes instead of 6 lanes. NB has 4 thru lanes and SB 3 thru+1 auxiliary lane to I-495 ramp

0	Team	Commenter	Page	Summary	Comment
11	BRT	JT	115-116	Existing & Proposed Traffic Lanes	Table 1 - University Boulevard within the Town Center boundary: none of the continuous turn lanes were accounted for. As is stated, it's somewhat misleading to suggest that there will be only 2 travel lanes in each direction with the repurposing of one travel lane (3 to 2 lanes in each direction). The turn lanes are continuous and part of the available public ROW.
12	BRT	JT	115-116	Existing & Proposed Traffic Lanes	Table 1 - University Boulevard WB Lexington Dr to Colesville Rd has 4 existing through lanes.
13	Transit	AW	117	Current Routes	Ride On Route 19 runs along University Blvd from Dennis Ave to the Beltway. Figure 82 shows it, but the plan text only mentions Routes 7, 8, and 9.
14	Transit	AW	117, Appendix F p2	Bus Routes	Pages 117 and Appendix F p2 should be updated to reflect new route numbers from WMATA's Better Bus effort.
15	Transit	AW	118	Ride On Reimagined	(AW) Ride On Reimagined was formally adopted in December 2024 and put into effect at the end of June 2025, so the description should be updated. (ADB) Or perhaps this entire paragraph could be deleted, as it is now the status quo.
16	Transit	AW	118	Better Bus Paragraph	A paragraph similar to the Ride On Reimagined paragraph should be added for WMATA's Better Bus network redesign, which affects all Metrobus service in the DC region.
17	Policy	HP, ADB	119	Bus Lanes Pilot	Language should be added/edited "The 16 month pilot allowed MCDOT and SHA to evaluate operations, passenger travel times, service reliability, customer experience and motorist compliance. Due to strong performance in all of these metrics, SHA determined that these bus lanes would be made permanent in May 2025."
18	Transit	AW	121, 150	Bus Stop Amenities	p121, 2nd bullet p150, "Transit Stop Improvement" On both pages, replace "new bus shelters" with "amenities based on ridership" Rationale: The current phrasing mentions improving the transit environment with "new bus shelters." However, shelters are typically reserved for the highest ridership stops, while other amenities (benches, wastebaskets, real-time arrival info screens, etc.) can be added at stops with lower ridership.

0	Team	Commenter	Page	Summary	Comment
19	Transit	AW	121	Door to Door vs Corner to Corner	<p>3rd bullet:</p> <p>Replace "door-to-door" with "corner-to-corner"</p> <p>Rationale:</p> <p>Door-to-door service is limited to specialized paratransit for seniors and persons with disabilities. Ride On Reimagined envisions adding Flex microtransit service to parts of the Plan area. Flex offers corner-to-corner service for all riders, which is much more cost effective to provide than door-to-door.</p>
20	VZ	WH	144	Safe Streets & Roads for All Reference	<p>The 3rd paragraph last sentence references "MDOT's Safe Streets and Roads for All initiative," but I believe the intended reference is for USDOT's Safe Streets and Roads for All (SS4A). If the intention is to reference an MDOT initiative, could replace SS4A with SHA's Pedestrian Safety Action Plan (PSAP).</p>

0	Team	Commenter	Page	Summary	Comment
21	VZ, Policy	WH, ADB	148-152	MDOT SHA Lead	<p>Table 2 - The majority of these items should have MDOT SHA as the lead. MCDOT cannot do anything to University Blvd without SHA's approval including new street connections, repurposing travel lanes, removing right-turn lanes, signalizing, etc. The following should have MDOT SHA as the Lead Agency and MCDOT as a Coordinating Agency:</p> <ul style="list-style-type: none"> - Repurpose General-Purpose Travel Lanes (p148) - Narrow Travel Lanes (p148) - Remove Channelized Right-Turn Lanes (p148) - Minimize Curb Radii (p148) - Signalize, Restrict, or Close Median Breaks (p149) - Consolidate, Remove, or Relocate Driveways (p149) - Protected Pedestrian Crossings (p151) - Street Lighting (p151) - "No Right Turn on Red" Restrictions (p151) - Leading Pedestrian Intervals (p151) <p>The following should be MDOT SHA and MCDOT both listed as Lead Agencies:</p> <ul style="list-style-type: none"> - Decorative Crosswalks (p149) - University Boulevard Sidepaths (p151) - Pedestrian Crossings (p151) - Public Pathway ADA Accessibility (p151) - (if Council or Planning feel that any of the above suggested for only MDOT SHA should be MDOT SHA / MCDOT, it's fine to assign both agencies) - Protected Intersections (p151)

Attachment B



DEPARTMENT OF ENVIRONMENTAL PROTECTION

Marc Elrich
County Executive

Jon Monger
Director

MEMORANDUM

August 4, 2025

TO: Kara Olsen Salazar, Planning Specialist
Department of General Services

FROM: Amy Stevens, Chief, Watershed Restoration Division
Department of Environmental Protection *Amy Stevens*

SUBJECT: University Boulevard Corridor Plan Amendment, Planning Board Draft – Executive Branch Comments

As requested, the Department of Environmental Protection (DEP) has reviewed the University Boulevard Corridor Plan, Planning Board Draft Final (Summer 2025). We appreciate this opportunity to provide comments. The comments provided in this memo expand on the comments that DEP provided to Montgomery Planning in December 2024. These comments were not all included in the February and March comments provided to the County Executive staff and Planning Board Chair on the public hearing draft. After conducting a more thorough review of the Planning Board Draft Final, DEP determined that it would be beneficial to include more detailed comments on the impact that development has on the environment and water quality in our County.

Additionally, DEP greatly appreciates the opportunity to collaborate with Planning prior to the release of the public hearing draft. We acknowledge and thank Planning for incorporating some of our comments and suggestions, particularly in Chapter 7: Environmental Sustainability.

DEP is submitting the following comments and analysis:

- **General Comment:** Increasing allowed density and intensity of development along the University Boulevard corridor will almost certainly result in a decrease in tree canopy, 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.

- **Chapter 1: Introduction, Environmental Sustainability, page 8:** 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.
- **Chapter 4: Land Use, Zoning, and Urban Design, Breewood Park Neighborhood, Land Use and Zoning Recommendations, Page 51:** 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. With an existing forest conservation easement and the required stream buffers, the developable area will be limited. Additionally, DEP has put a substantial amount of work into the Breewood tributary watershed. This includes expenditures of just under \$5 million for installation of 23 green infrastructure practices and a stream restoration project. This site is fairly disconnected from the surrounding neighborhoods and does not appear well suited for a neighborhood center. There are already existing connections across University Boulevard at Arcola Avenue and Sligo Creek Parkway. There does not appear to be a need to promote one at this location. With protected forest area on three sides, this site doesn't appear to be very well suited for infill development. Zoning changes would not change its relative isolation from the rest of the neighborhood. DEP recommends maintaining the zoning preferably as Residential Zone R-60 zoning, or secondarily changing to Commercial Residential Neighborhood CRN 1.0, C-0.0, R-1.0, H-50' to address other goals and accommodate property owners wishes.
- **Chapter 4: Land Use, Zoning, and Urban Design, Mary's Center Neighborhood, Page 57:** DEP recommends including the 3 lots facing Gilmore Drive between the Masonic Temple and Mary's Center also be zoned as Commercial Residential Town (CRT) to allow for site consolidation, more efficient site design, and reduced impervious surface.
- **Chapter 5: Housing, (starting page 77):** Duplexes are the only housing type depicted which indicates they are a preferred housing type for the corridor. However, duplexes may not be well suited for the University Blvd corridor. Driveways are already an issue for the corridor. With no on-street parking and multiple cars per house, on-lot parking is important. If individual lots become duplexes, there will be a demand for two driveways per lot, or at least wider driveways. Additionally, there will be even greater demand for on-site parking area in which much of each lot will become parking. This will contribute to an increase in impervious surfaces and a decrease in tree canopy. Additionally, the numerous driveways will be a hazard to pedestrians, bicyclists, and vehicles. They will also reduce right of way (ROW) space for street trees and stormwater management. This is at direct odds with promoting a 'cool' corridor and other environmental goals. It is recommended that if multi-unit housing is built along the corridor, it should be done in a way which decreases curb cuts and consolidates access and parking so that they are implemented more efficiently and minimize impervious surfaces.
- **Chapter 7: Environmental Sustainability (starting page 86):** 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. Furthermore, 35% is the same as what has been proposed for much more urban areas than University Boulevard Corridor. Although it is acknowledged that the intent

is for the corridor to become more urbanized, it is not a downtown. A higher percentage of green cover is recommended to ensure the overarching goals of environmental sustainability recommendations for the Plan. Additionally, to promote tree canopy and a ‘cool’ corridor, it is recommended that a minimum number of canopy trees be planted within a set distance of the University Boulevard ROW for new development.

- **Chapter 8: Transportation (starting page 91):** For all street cross sections, tree planting should not be limited to the planting strip in the ROW between the sidewalk and road. Tree planting should be shown on both sides of sidewalks. Tree planting in this manner should be encouraged by whatever means feasible on both public and private property. Tree planting should also be included in medians and 5’ planting strips.
- **Figure 80: University Boulevard East – Westbound Phase 1, page 111:** It is unclear if the building on the left is an existing building or future building. If it is future, even if interim, with a 4’ sidewalk, the building frontage should not be right on the ROW line. More space is needed for pedestrian comfort and for tree growth.

We appreciate the opportunity to comment on the Planning Board Draft and look forward to continuing to partner with Planning staff on future plans.

cc: Claire Iseli, CEX
Meredith Wellington, CEX
Jon Monger, DEP
Jeff Seltzer, DEP

Attachment C



DEPARTMENT OF PERMITTING SERVICES

Marc Elrich
County Executive

Rabbiah Sabbakhan
Director

MEMORANDUM

August 7, 2025

To: Kara Olsen Salazar, Planning Specialist
Department of General Services

From: Rabbiah Sabbakhan, Director *Rabbiah Sabbakhan*
Department of Permitting Services

Subject: Department Comments – Planning Board Draft - University Boulevard Corridor Plan

The Montgomery County Department of Permitting Services has completed its review of the Planning Board's draft of the University Boulevard Corridor Plan and has the following comments to submit:

Chapter 5 – Housing

The language in this chapter is somewhat vague; however, please note that all new construction will be subject to the applicable codes.

Chapter 7 – Environmental Sustainability

The tree protection language should be more specific and clearly state that all existing trees must be protected at the drip line. This helps reduce root zone soil compaction. We will be proposing this amendment in the 2024 International Green Construction Code (IgCC).

Rabbiah Sabbakhan, Director
Department of Permitting Services

C: Ehsan Motazed, Deputy Director
Claire Iseli, Special Assistant to the County Executive
Meredith Wellington, Policy Analyst