

Testimony before the County Council on HoCo by Design-Accessory Dwelling Units

My community of Dunloggin is an established community; it has a character, and that character is what made us buy homes here. Good land use protects the character of established neighborhoods. ADUs could lead to significant changes in the character of the neighborhood. We love our plants and our local wildlife, but older neighborhoods like ours do not have dedicated open space. Our backyards are our open space, and ADUs could significantly reduce the open space we all enjoy, even when it is in a neighbors' yard. The decrease in green space is especially significant in our neighborhood with our poor drainage and inadequate stormwater management. ADUs will significantly increase impermeable surfaces and increase runoff problems and flooding for nearby homes. A number of my neighbors have experienced stormwater damage to their homes in excess of \$50,000; often this happens after the county has allowed a single oversized lot to be subdivided or a neighbor has built a significant addition to their home. The county does not require new construction to take steps to prevent the issues it creates.

ADUs are bound to increase traffic and parking on neighborhood streets, which were not designed to accommodate parking.

It is ironic that ADUs are often called "age-friendly" because older adults could house caregivers or rent the ADU to get extra income or younger families could house their parents. We can do both now within our current homes. Older adults overwhelmingly desire to "age in place", which means we want to stay not just in our homes but also in the communities we chose to move to many years ago. We do not want them to change to higher densities and less green space. It is not "age-friendly" to older adults to promote ADUs.

Ultimately, of course, everyone will sell their homes. What happens if we sell a house with an ADU? Some think it will make the house harder to sell, because most people will not want a second house on the property. The property may be most likely to appeal to investors who will want to rent out both units. This can be done with a conditional use, which is usually granted unless some unusual condition exists. Nonresident landlords simply do not maintain the property the way a resident owner would. On the other hand, the seller may just ask to have the property divided and sell it to two buyers, and I would give you odds that the county would allow it. Hmmm, since the original property would still be zoned for single family, I wonder if they could then add a new ADU?

Proponents say ADUs will provide more affordable housing, but that claim ignores the cost per square foot to build a detached home in Howard County, even if you already own the land.

The board of my Saint John's Community Association has not held a specific vote on ADUs, but we did a survey in 2021. There were 134 responses, of which 106 were opposed, 23 in favor, and 5 uncertain.

Please vote not to allow accessory dwelling units as a matter of right anywhere in the county.

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Prepared Testimony of Cedric Brown (20+ Year Homeowner Columbia, MD)

June 14, 2023

Good evening Howard County Councilpersons. I am writing to express what I've experienced as a Howard County homeowner, and as civil servant/ housing professional.

As a homeowner in Howard County, for over 20 years, I would be remiss to not acknowledge the property appreciation that comes with being in Howard County, MD. At the same time, I am greatly concerned that if I sold my home, I am unable to afford a similarly equipped home, not to mention my forever home here in prestigious Howard County.

The limited supply of housing deliveries in Howard County (resale and new construction) contributes to home sale price spikes and continued price escalations. This holds true for rental rates in private residences, and in typical commercial buildings as well. I have noticed these trends from county publications, local property listings, and through discussions with my child who has recently graduated college and attempted to locate an apartment home in Howard County.

Ironically, I have been a civil servant employee in the local affordable housing field for over 20 years. I noticed that Howard County staff and Council has (to their credit) implemented some of the tools (MIHU and the Right of First Refusal) that other jurisdictions have been using to assist with preserving and expanding the supply of affordable housing. These measures are great for **making progress towards combatting the undersupply of 20,000 housing units, and addressing the county's guiding principle of increasing housing opportunities in locations that do not have them at this time.**

I will also echo the thoughts of the Howard County Housing Affordability Coalition that the County Council needs to relax its restrictive policies and allow infill housing of various types onto traditional single family lots, yielding higher densities to serve more low to moderate income families. Accessory Dwelling Units ADUs are another means to allow property owners to construct a smaller unit for a relative, or caretaker. Using these tools and strategies to deliver more affordable housing will demonstrate measurable progress and data for the Development Monitoring System Report.

Let's be clear, *HoCo By Design* is not just the name of the General Plan document, it can also represent the title of the story depicting whether the success or failure to deliver affordable housing in Howard County was indeed *By Design*.

Thank you--

Good evening members of the Council. My name is Connor Gephart and I am a resident of Ellicott City. I am speaking tonight in favor of HoCo By Design, and I will highlight some areas that I think are particularly important to focus on as we move through the process. Specifically, I will focus on Chapter 4: County in Motion and Chapter 6: Dynamic Neighborhoods. On the whole I am impressed by the thought and care put into the plan, and I hope to see many of the ideas presented implemented over the coming years.

Regarding Chapter 4, I believe we are in dire need of a high-functioning and efficient public transport network. Quoting the plan, "Many community members continue to express their desires to replace their work, shopping, or other automobile trips with more economic and environmentally-conscious choices." I know I am personally frustrated with the lack of alternative transportation options where I live. I am 5 minutes away from Old Ellicott city by car. However, there are no sidewalks or bike lanes, and if I wanted to try to take a bus, I have to wait on the side of a road with no real protections from cars, and the bus only arrives once an hour. These problems are only exacerbated if I wanted to try to get to Columbia or Laurel. Now this is obviously a specific example and I do not expect HoCo By Design to address these complaints in particular, but I do want to focus on how it states "automobile travel will continue to dominate travel patterns for the near future." I think this is something that can and should be changed via policies that encourage investment in providing a usable public transport network. I would love to be able to experience more of the county without having to drive to wherever I want to go just to park my car and have it take up space that could be better suited to anything other than parking. I am excited by the suggested transportation infrastructure investments in Table 4-1, and I hope we all take a look at our current infrastructure and find ways to build it to be more easily accessed, traveled, and enjoyed by everyone in the county.

Onto Chapter 6, I am a young person thinking about buying a house. However, I will provide some personal information here to highlight some problems that are discussed in Chapter 6. When I was about 10 years old, my uncle passed away from cancer. I was included in his will and was left money to help pay for my schooling and use whatever was left to help get my adult life started. This puts me in a fortunate and privileged position of having enough money to, maybe, afford a down payment on a house in the county. However, without that money from a death in my family, I wouldn't be able to even consider buying a house for years. My partner is a teacher in Howard County Public Schools. If we were not together, there is potential she would be priced out of her job because housing is so expensive here. It is imperative that we build and maintain housing that is accessible to everyone, and I think HoCo By Design makes a good attempt at doing so. Diversifying the types of housing allowed to be built throughout the county, we can work to meet the demand for the "missing middle housing", which should work to bring prices into a more affordable range. However, I believe we must develop and implement additional policies to create a county where people can afford to live and work. In addition to everything outlined in HoCo By Design, policies like rent control expansion and publicly subsidized housing efforts like the unfortunately recently killed Housing Opportunities Trust Fund can help to increase affordability across the county.

Overall, I am excited about HoCo By Design and I think it contains a lot of good ideas. Additionally, I believe we must become a leader in the state for cultivating our community through bold programs that create real change for our current and future residents.

Howard County Council Public Hearing for the General Plan Chapters 1 - 6,
June 14, 2023

Hello Council Chair and County Council,

My name is Eboni Massey, and I live in Howard County, with my two young kids. I am a single mom trying to make things work the best way I can. Currently I am renting and trying to own a place of my own. But because rent is so high, I have been really struggling to find a place I can afford. My two kids love the schools that they attend here, and they have a sense of community. But if I can't find housing I can afford, I might be forced to take them from the place they call home. As a mom, I don't want to strip them from the place they really enjoy and want to keep going to. They even like going to school! Not being able to stay housed here will take them away from that.

Many renters are paying more than 50 cents of every dollar they earn to rent their home. For people with moderate or lower incomes, it's almost impossible to buy a home. I am here as a mother, speaking on behalf of all parents trying to provide the best life they can for their kids. They deserve that sense of security and happiness.

Council, you all have had and still have the opportunity to raise your kids in this county and not question your housing or if your kids can stay at the school they enjoy. I am just trying to have that same opportunity for me and my family. We deserve that same right.

There needs to be a significant expansion in the housing supply. Not only do we need more houses, but we need to make sure that there is enough affordable housing for people who need it, like young adults and families.

Imagine a community where all kids get to grow up in the neighbors they love without a worry. Imagine how less stressed everyone would be knowing they have a place to call home that they feel safe and secure in. County Council, we need you to increase the amount of affordable housing in this county. Not tomorrow, not down the line, but today. Because all our children deserve to experience the benefits of growing up and staying in Howard County.

Please move forward with the recommendations from the Housing Affordability Coalition. Thank you for your time.



Bike HoCo - Bicycling Advocates of Howard County

Testimony to County Council for *HoCo By Design Chapter 4 County in Motion* Public Hearing
June 14, 2023

Bike HoCo, founded in 2008 as Bicycling Advocates of Howard County, is a 501(c)3 tax exempt organization representing over 1000 Howard County cyclists as well as local bicycling clubs and groups. Bike HoCo advocates to improve the visibility and safety of bicycling and promotes a vision of bicycling and sharing the road as part of a healthy, energy efficient, and environmentally sound transportation system to help achieve a sustainable future for Howard County and for Maryland. Most recently Bike HoCo has established two programs to encourage bicycling as a form of transportation. Bike HoCo has been providing *Bike Corrals* (secure bicycle parking) at events (e.g., July 4th at Lakefront and Old Ellicott City Music Fest) to encourage attendees to ride not drive. In addition, we recently started the *Bike HoCo Trip Rewards* where participating Howard County businesses, restaurants and bars offer a discount to people who cycle to their establishments and show a bike helmet with a *Trip Rewards* sticker.

General and specific comments/concerns of the *HoCo By Design County in Motion Chapter 4* are provided below. Comments are binned by key topics in the Chapter: 1) maintaining the transportation system, which addresses the importance of investing in the ongoing maintenance and upkeep of the system; 2) safety and the transportation system, which details the actions the County is taking to ensure the transportation system is safe for all users; 3) transportation mobility and access, which addresses the wide range of topics, factors, and actions the County considers in managing the transportation system; 4) delivering transportation projects, which outlines the challenges in delivering transportation projects and options to accelerate projects; 5) future of the transportation system, which outlines the pending and expected changes facing the transportation system in the County and region; and 6) transportation investment priorities, which details a range of transportation investments to support the goals in *HoCo By Design*.

General comments/context: Transportation includes: automobiles and other powered vehicles (and potentially autonomous vehicles in the future), active transportation focuses on bicycling (including E-bikes and scooters) and walking, and transit includes publicly provided inter and intra County bus service. All development, redevelopment or remediation of existing transportation shortfalls plans/reviews should include a holistic assessment of all these forms of transportation. One of the foundational elements of any assessment should be the equity of the transportation system, geographically, socio-economically and for residents limited physical ability. Technical terminology in comments below is avoided in favor of plain English.

Key Topic Comments/Concerns:

- 1) **Maintenance:** The focus in this section is on physical maintenance of roads, sidewalks, bicycling infrastructure, control/directional devices (e.g., stoplights) and transit vehicles. What is not addressed is the routine clearance of active transportation routes of debris and snow to ensure the networks are available year-round. Currently sidewalk clearance has been assumed to be done by adjacent property owners even when not feasible and bicycle lanes are only done periodically. The maintenance of ancillary systems/equipment (e.g., bicycle racks, ADA compliant curbs, etc.) should be included. Bottom line: The lifecycle cost of any transportation infrastructure should be considered and budgeted for when approved for acquisition.
- 2) **Safety:** Includes the physical condition of transportation networks, design of new/remodeled using best practices, and additions such as crosswalks and devices such as pedestrian hybrid beacon (AKA Hawk signals). Bottom line: A safety assessment need to be included in every new transportation project and whenever fatal or serious accident occur on existing infrastructure.
- 3) **Mobility and Access:** In this section mobility equates to ability to keep moving quickly (traffic) and access to the multi-modal networks to connect people with places they want to get to. There are key elements on how new development/redevelopment impact should be assessed. Current Planning & Zoning (P&Z) technical reports assess road traffic at nearest intersections, but road traffic is cumulative and the impact (traffic generated can extend far beyond initial development area to major County and State roads. In addition, Complete Streets requires an impact analysis of new/denser development on existing pedestrian and bicycle infrastructure and routes and the opportunity it may offer to close gaps in existing active transportation infrastructure. Finally, a transit assessment needs to be implemented which looks at new development, especially 'Activity Centers' which need transit to connect them inter and intra County (extending existing routes or creating new routes) otherwise they will be disconnected islands. Bottom line: Transportation demand and utilization is cumulative and must be factored into approval processes.
- 4) **Delivering Projects:** One of the gaps mentioned earlier in new transportation infrastructure is to calculate the lifecycle cost to maintain that infrastructure. Bottom line: Accelerating projects is good, but the implied maintenance required can accumulate to a point that is unaffordable.
- 5) **Future Transportation:** Automated personal and transit vehicles will impact safety on our transportation infrastructure unless considered at every stage in the approval process. The other factor that has lingered post-pandemic is work from home for many of the jobs/professions that in the past have made Howard County an attractive place to live due to proximity to work opportunities. This may significantly reduce transportation demand and could decrease demand for housing and intra-County transportation. Finally, looking at European models for sequential transportation (bike-walk-transit) should be emulated and made viable to reduce vehicle use, congestion, and pollution. Bottom line: The future is unpredictable and transportation planning must be agile and be constantly monitored and modified as circumstances change.

- 6) **Investment Priorities:** We cannot continue to develop housing either horizontally (e.g., spread into Western County) or vertically (e.g., denser ‘Activity Centers’) without assessing the impact on transportation as well as other County provided services (schools, fire/police, parks, etc.). Transportation funding will continue to be limited and maybe more so in the future with many other deferred and new priorities vying for limited funding. We must address existing transportation gaps and equity issues across the County before adding new transportation demand. Bottom line: Dollars are limited, and funds must be utilized to address existing needs before adding new requirements to an already strained system.

Bike HoCo would gladly respond to any questions the Council may have on our comments or to act as a subject matter expert at any future General Plan Work Sessions and/or Public Hearings.

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**County Council Public Hearing Testimony
CB28-2023 - HoCo By Design (General Plan)
June 14, 2023**

Chairperson Rigby, Vice Chairperson Jung, and Council members. My name is Dana Sohr. I am testifying this evening as a member of the Steering Committee of the Housing Affordability Coalition. My testimony highlights the Coalition's positions, which are being submitted in this letter to the Council. I want to note that the letter has been signed by over 400 Coalition members and others advocating for solutions to the county's housing crisis.

I am pleased to recognize the residents who have come here tonight to advocate for a better future for our community. We are worried about that future, because all the available data shows clearly that our housing market not only isn't serving community needs, but it is punishing people every day:

- 13,000 renter households are now paying unaffordable rents—meaning more than 30% of their gross income. Nearly 7,000 of these households now pay over 50% of gross income on rent. These statistics get worse every year as our housing costs continue to rise faster than wages.
- Seniors are hurting, too. They will comprise 20% of our population by the year 2030, and for thousands of senior renters, average rents now exceed pension incomes. And, many senior homeowners who want to downsize discover they can't do that here affordably.
- People with disabilities are being made more vulnerable by the near -total absence of affordable homes that are accessible and ADA-compliant.
- And last, young adults are hurting because most of them cannot afford to launch here. Many are abandoning the county and applying their talents and energy elsewhere. This erosion of precious human capital doesn't bode well. We should be enjoying the benefits of our investments in all these bright young graduates of our school system and the Community College, not losing their talents to counties that have lower housing costs.

The people I have described live here today. They are our friends, neighbors, co-workers, and family members. Their economic pain is rooted in a housing market that is misaligned with community needs. Housing is the biggest expense in most peoples' budgets, so when it costs too much, everything else gets squeezed. Unfortunately, county policies have prevented the construction of enough homes to keep pace with our job growth, and those policies have created a scarcity of homes, which has created intense competition for homes, which has driven up home prices and rents. Our housing policies are hurting people and they are jeopardizing our community's economic future.

In summary, the Coalition strongly recommends that HoCo By Design incorporate the performance targets and recommendations from the Housing Opportunities Master Plan (HOMP), enhance the proposed Land Use Map, and specify housing and other foundational targets for New Town and the Gateway Regional Activity Master Plan. With these changes, as further detailed below, HoCo By Design will meet its intended objective to provide the

necessary housing roadmap for ensuring a vibrant, achievable future for all Howard County residents.

HoCo By Design clearly states that after periods of substantial growth in the prior decades, the county is at a *critical inflection point*. In the area of housing, the Report acknowledges the current undersupply (20,000 homes) and projects that continued robust job creation (59,000 new jobs over the next 15 years) will only fuel further housing demand (31,000 homes) (Chapter 2, p. 11).

Further, the Report states that “... *To sustain the economic growth that has been historically enjoyed and to maintain a competitive edge over other markets the County must continue to invest in housing, infrastructure, place making, job creation, and other activities that make it a desirable place for people and employers to call home* (Chapter 2, p. 10). As Chapter 2 also describes, this is a decisive turning point—a second inflection point—in our county’s planning history because there is a high demand for new housing and for commercial growth. The RCLCO Market Research and Demand Forecast indicates that new growth is important to maintain the high quality of life and service and infrastructure levels (including housing and schools) that Howard County residents expect. The fiscal study, in connection with the HoCo By Design report, determined, based on current cost and revenue structure and service levels in the County, that new growth—being able to add more jobs and create more housing—would generate more revenues than costs for services and infrastructure. It is also important to note that a recent review from the Spending Affordability Committee is consistent with these analyses, recognizing that the current path is unsustainable, and the County must come to a spending, debt and growth reckoning with a future development that doesn’t look like the past.

These analyses underscore the imperative that HoCo By Design strongly supports increasing the county housing supply through the development of new, redeveloped, and preserved housing units affordable to all income levels, particularly housing affordable for members of our workforce, seniors, people with disabilities and young adults. Yet the Plan’s response regarding the needed investment in housing falls disappointingly short by recommending an annual allocation of only 1,580 units, which is far below the currently approved annual allocation of 1,934 units.

In recommending the lower allocation, HoCo By Design uses the following rationale:

The total annual average of approximately 1,580 units is significantly less than the 2,084 units targeted in the allocation chart of the pervious general plan, PlanHoward 2030. However, since the County has only realized an annual average of about 1500-1600 units per year over the past decade, the revised target of 1580 units is a realistic measure given the remaining land available and multiple factors influencing growth.

The Coalition believes that this rationale misses the point of a general plan, which should be to set goals that will respond to known community needs—in this case the County’s undersupply of 20,000, including 7,500 affordable, housing units. The Plan should outline ways to achieve the community needs goal, not set a lower goal because it hasn’t been met in the past few years due to development obstacles. To do the opposite—to actually set a target lower than PlanHoward 2030—guarantees perpetuating and exacerbating what the report forthrightly states is a housing crisis.

If the lower housing target (1,580) is adopted and if it becomes possible to create more affordable units, the allocation cap would prohibit creating those units. Our perspective is that it is more responsible to establish a goal to meet the community needs and then use the multiple tools offered by the Plan (e.g., missing middle housing; accessory dwelling units [ADUs]; public/private re-development projects that utilize public lands and physical assets) to achieve that goal.

The March 23, 2023 Planning Board Letter to the Council recommending approval of the HoCo By Design Report supports the higher allocation target with the specific recommendation ...“that the Council increase the housing allocation units with an emphasis on providing affordable housing in line with the recommendations of the Housing Opportunities Master Plan.”

To ensure that the next General Plan achieves its goals—including a healthy jobs/housing balance—and provides concrete direction to the comprehensive zoning, APFO and other decisions and processes necessary to implement the Plan, the Coalition offers the following recommendations.

- 1. Change the proposed Adequate Public Facilities Ordinance (APFO) Allocation Chart by increasing the total new housing units to 2,000 (consistent with PlanHoward 2030 allocations) of which 500 would be affordable housing units.**

While the Housing Opportunities Master Plan recommends 300 affordable units should be created annually for households earning less than 60% of Area Median Income, the Coalition, as it argued during the Master Plan development process, believes that 500 units, 25% of the 2000 annual target, is the more appropriate target considering the pent-up demand recognized by HoCo By Design consultants. The 2000-unit annual target is consistent with HOMP recommendations and forecasts from consultants that our community will need 31,000 new homes over the next 15 years to keep pace with anticipated commercial growth of 59,000 jobs.

The proposed 1,580 residential units per year (Table 10-1, Managing Growth Chapter 10, page 8) would not only fail to meet the demand for market-rate housing by a wide margin but, by deliberately falling short of demand, the plan would worsen the already steep slope of affordability for home sales and rentals.

- 2. Explicitly integrate Housing Opportunities Master Plan (HOMP) growth, affordability, accessibility, preservation, and redevelopment targets and supporting recommendations into HoCo By Design. (See Attachment 1 and Attachment 2.)**

The Housing Opportunities Master Plan (HOMP) was developed through a process that mirrored the HoCo By Design development process. The performance targets and recommendations in the HOMP considered expert consultants (some of them used in both processes), public comments, and the expertise of a 32-member volunteer Task Force. HoCo By Design should not disregard the results & recommendations of such an effort without evidence showing that the HOMP recommendations are no longer accurate or needed.

For example, the HOMP Task Force worked hard to get a solid flat minimum number and not just a percentage of new homes built annually. In accepting the HOMP, the Administration embraced a minimum of 300 affordable homes per year. It is disappointing

that HoCo By Design reduces that target by half to 10 percent of allocations (158 units). Just because targets of 300—or as we propose, 500 units—may be hard to achieve, there is no reason to establish a lower target, especially when it will perpetuate and exacerbate current community housing needs. Our proposed target of 2000 new homes annually is not only consistent with the HoCo By Design consultant forecasts of housing need, but also is the same as the annual Growth Target recommended in the HOMP Task Force Report.

3. Modify the proposed land use map to facilitate housing equity and de-concentration of low-income household neighborhoods through the following:

- Explicitly calling for the development of multifamily buildings by right in a substantially wider range of neighborhoods;
- Allowing townhomes and up to 6-unit multifamily buildings in single-family areas and larger buildings in single family areas near transit and transit corridors;
- Adjusting the Planned Service Area (PSA) to include the four areas shown as Clarksville, Highland, Fulton, and between Fulton and the Montgomery County border; and
- Proposing within the scope of the land use map (i.e., activity centers, increased vertical density) opportunities to use the Plan’s proposed “tools” for land use, growth, and development (i.e., Accessory Dwelling Units [ADUs]; missing middle housing; public/private re-development projects that utilize public lands and physical assets).

4. Develop further the Illustrative Concept Plans in Technical Appendix C- Focus Areas, particularly those that offer affordable housing opportunities, including New Town.

The potential of New Town, particularly, to be used to develop affordable housing is significant. During PlanHoward 2030, the community was told that the focus at that time would be Columbia’s Downtown, but that a fuller review of New Town would be a primary focus of the next General Plan. Instead, HoCo By Design gives New Town only cursory attention. By the time the next General Plan comes up for review—another 10 years—New Town will have been largely ignored since at least the 2000 General Plan (regionalism and reservation of the West were the focus) and possibly not since the 1990 General Plan in which growth control was one of the primary goals. New Town is an opportunity that should be more strongly emphasized in this Report.

5. Establish commercial, housing, school capacity and transportation targets as the foundational goals of the to-be-developed Gateway Regional Activity Center Master Plan, which should be undertaken at an accelerated pace.

HoCo By Design recognizes the importance of Gateway (an area twice the size of Downtown Columbia) in planning to meet the County’s housing needs, but it does not establish growth targets nor recommend an accelerated master planning process, both of which HAC recommends. We know the process will be long (the Columbia Downtown Plan was first adopted in 2010 and is still being developed and implemented), so it is imperative that the process begin on an expedited basis.

In addition to the five housing-specific recommendations noted above, the Coalition wishes to express its support for Chapter 8: Public School Facilities policy statements 1 and 3 that encourage the following:

- The County, Howard County Public School System (HCPSS), and private sector should work collaboratively to identify school sites that meet the needs of the student population and anticipate future growth patterns; and
- The County and Howard County Public School System (HCPSS) should collaborate on future school sites and develop tools that provide the flexibility needed to allow for alternative school designs, flexible site requirements, and adaptive reuse of underutilized properties, including the suggested implementing actions to:
 - Examine alternatives to the Adequate Public Facilities Ordinance waiting periods whereby a development proposal offsets the potential impact to zoned schools through an additional voluntary mitigation payment.
 - Ensure coordination of HoCo By Design and the HCPSS capital planning so that school capacity projects are planned in activity center areas identified for transformation on the Future Land Use Map.

Thank you for the opportunity to offer these recommendations that will help ensure HoCo By Design meets its stated objective “to provide the necessary housing roadmap for ensuring a vibrant, achievable future for ALL Howard County residents.”

Respectfully submitted,

Housing Affordability Coalition Steering Committee Members

Paul Casey, Tom Coale, Joan Driessen, Jackie Eng, Peter Engle, Grace Kubofcik, Grace Morris, Vonda Orders, Rich Pardoe, Paul Revelle, Jean Sedlacko, Dana Sohr, Pat Sylvester, Joe Wilmott, Phyllis Zolotorow

Attachment 1: Housing Opportunities Master Plan Performance Targets and Recommendations

Attachment 2: Proposed Modification to the Draft HoCo By Design APFO Allocations Chart

Attachment #1

Howard County Housing Opportunities Master Plan Performance Targets and Recommendations

- **Growth Target: At least 70 new housing units for every 100 new jobs in any given year.**
This target translates to roughly 2,000 housing units per year over the next decade, based on the current job growth forecast and adjusting for the job losses associated with COVID-19 pandemic.
- **Affordability Target: The greater of at least 15% of all net new housing units or 300 units overall should be available to households making less than 60% of AMI each year.**
If realized, this target would translate to at least 3,000 units over the next decade, reducing the current imbalance by 30% or more.
- **Accessibility Target: At least 10% of new housing units affordable to households making less than 60% of AMI should be physically accessible for persons with disabilities.**
This target should be supplemented with concerted efforts to facilitate accessibility improvements to the existing ownership and rental stock to better enable integrated aging in place.
- **Preservation Target: Zero net loss of existing affordability for households with incomes below 60% of AMI.**
Howard County should pledge to maintain the existing number of housing units in which these households can live without cost burdens, while still adding net new affordable housing units consistent with the Affordability Target.
- **Redevelopment Target: One-for-one replacement of affordable housing units, on a countywide basis, when redevelopment is necessary.**
For example, the removal of a property with 100 affordable housing units should coincide with the addition of 100 new affordable housing units, whether in the form of newly constructed units, negotiated rental contracts, or another program, policy or strategy outlined in the Housing Opportunity Master Plan.

Recommendations

- **Revise land use, planning and zoning regulations to improve the availability, accessibility, affordability and diversity of housing.**
 - Use land use policy and provide incentives to produce income-restricted housing units.
 - Enable more equitable growth throughout the county through changes to zoning regulations and land use plans
 - Facilitate development of lower-cost housing typologies
 - Remove zoning barriers to mixed-use neighborhoods and developments
 - Promote efficient processes for approving development
- **Support housing stability and affordability through the improvements of existing policies and programs, as well as the creation of new ones.**
 - Improve housing sector coordination and boost capacity
 - Raise and deploy capital for affordable housing production and preservations
 - Create a robust multifamily preservation strategy
 - Improve housing conditions and promote and expand programs that support households with home repair and modification needs
 - Expand opportunities for homeownership
 - Support low-income households, vulnerable populations, and households with specialized needs.

- **Find creative ways to meet demands for both housing and infrastructure, and consider targeted amendments to the APFO to improve planning and predictability.**
 - Identify creative mechanisms to fund both housing and school facility investment and to attain full development of annual allotted new housing units to meet growing demand.
 - Evaluate targeted APFO changes to support the growth required to improve housing affordability and opportunities when the PAOF Review Committee convenes following the General Plan.
 - Creatively use County land assets.

Attachment #2
Proposed Modification to the Draft HoCo By Design APFO Allocations Chart

*Proposed Change: Increase the Affordable Housing column
from the plan's proposed 150 units to 500 units*

Table 10-1: Howard County APFO Allocations Chart-HoCoByDesign							
Year	Downtown Columbia	Activity Centers	Other Character Areas	Rural West	Total	Green Neighborhood	Affordable Housing
2026	335	600	365	100	1,400	150	500
2027	335	600	365	100	1,400	150	500
2028	335	600	365	100	1,400	150	500
2029	335	600	365	100	1,400	150	500
2030	335	600	365	100	1,400	150	500
2031	155	600	365	100	1,220	150	500
2032	155	600	365	100	1,220	150	500
2033	155	600	365	100	1,220	150	500
2034	155	600	365	100	1,220	150	500
2035	154	600	365	100	1,219	150	500
2036	154	600	365	100	1,219	150	500
2037	154	600	365	100	1,219	150	500
2038	154	600	365	100	1,219	150	500
2039	154	600	365	100	1,219	150	500
2040	154	600	365	100	1,219	150	500
Total	3,219	9,000	5,475	1,500	19,194	2,250	7,500
Annual Average	215	600	365	100	1,280	150	500

**The following community members
have signed their names to the Coalition's testimony.**

Carol Abbott	Patricia Buonaguro-Laidig	Normale Doyle
Germaine Acampora	Cassandra Burra	Joan Driessen
Bola Afolabi	Patricia Butler	Patrick Driessen
Laurie Alderman	Erica Byrne	Carol Dunlavey
Craig Allen	Tyson Byrne	Jessamine Duvall
Claudia Andorsky	Sthephora Camille Pierre	Shaun Eddy
Roy Appletree	craig carlin	Dana Edwards
Raya Armaly	David Carrera	Jim Ehle
Nicole Armstrong	Santiago Carrera	Sherry L. Elswick
Erin Ashinghurst	Mary M Carrington	Gary Eng
Anwi Maureen Atanga	Larry Carson	Jackie Eng
Jennifer Ayers	Postell Carter	Peter Engel
Harriet Bachman	Paul and Kathleen Casey	Erin Engelbrecht
Annora Bailey	Cheri Chaney-Hall	Gillian Engelbrecht
Alan Baker	Catherine Chiccone	Janelle Erickson
Kay Baker	Kevin Chin	Huseyhin Esin
Robert Ballinger	Erik Christiansen	Paris Evans
Theresa Ballinger	Clara Chu	Janssen Evelyn
Timothy Banks	Stephen Clinger	Molly Falcone
Valerie Barnard	Courtney Clutts	Patricia Fanning
Andrea Barnes	Deborah Clutts	Frank Feng
Lida Barthol	Sara Cochran	Kike Fisher
Sarah Basehart	Kofo Coker	Dan Flynn
Dawn Baskin	Carol Collins	Arlene Fonaroff
Maria Bayer	Woodrow Collins	Paula Forman
Mae Beale	Katie Collins-Ihrke	Dehaven
Rebecca Beall	Ms. Colombe	Joel Frankel
Pam Beck	Brittany Colson	Linda Frazier
Jorge Benavides	Phyllis Cook	Nefertiti Frazier
Stacey Benjamin	Sharon Cooper-Kerr	Lauren Frias
Rachel Berman	Oswald Copeland	Ruth Frost
Bonnie Besseck	Susan Corp	Gordon Fuller
Dionne Bettis	Dana Couch	Ms. Gabriela
Vivian Bland	Tricia Crossett	Georgina Garcia
Martine Bocas	Amy Curran	Marilyn Garcia
Joseph Bock	Amanda Davis	Michelle Garra
Lauren Boyd	Daryl Davis	Jay Geis
Kiauhna Braddy	Susan Defibaugh	Peggy Gessler
Emily Brandon	Vera Dehaven	Tanesha Gibson
Tracy Broccolino	Nerlie Demesyieux	Joy Gigliotti
Jennifer Broderick	Jim DiSciullo	Denise Giuliano
Amy Brooks	Abigail M. Dixon	Kathy Glyshaw
Ajile Brown	Phillip Dodge	James Gold
Avis Brown	Jeremy Dommu	Jennifer Goldstein
Cedric Brown	Maureen Donaghy	Neal Goturi
Judy Bruns	Meagan Downey	Denise Gough

Anne Gould	Toshshea King	Laura Mayton
Carole Graves	Kelly Klinefelter	Alexis McCann
Keisha Graves	Crystal Konny	Leonardo McClarty
C Vernon Gray	Matthew Krist	Bill McCormack Jr
Steven Gray	grace kubofcik	Jacquelin McCoy
Adrienne Gunn	Simone Kuntz	Julia McCready
Natasia Gurley	Tolulope L	Gladys (CeCe) McCullough
Harry Hairston	Margaret LaFon	Ellen McDaniel
Rita Hamlet	Barbara Lagas	John McIntyre
Karen Hamming	Joanna Lake	Monique McLeod
Julie Haney	Jacqueline LaMothe	Quintana Mcnair
John Harris	Linda Lamppert Leslie	Daniel Medinger
Gloria Harriston	Joanne LaPorte	Malek Medley
Shaniqua Hasell	Kathleen Larson	Margaret Merritt
Donna Hayman	Jelina Lau-Lopez	Laura Mettle
Norman Hazzard	Barbara Lawson Vivian	Vickie Miles
Nicole Hebron	Moore Lawyer Shauna	Jacquelyn Miles Humes
Kitola Henderson	Leavey	Derek Miller
Katya Hernandez	Craig Lee	Terryann Miller
Robin Hessey	Jihun Lee	Ruth Milliken
Alison Hickman	Regina Lee	Tony Mirenzi
Carletta Hickman	Jennifer Leete	Evelyn Mogren
Robin Hirschhorn	Jon Lemich	Chanel Moody
Ruth Hoang	Raymond LeVesque	Alisa Moore
Frederick Hobson	stan levi	Grace Morris
Rhonda Holbrook	Donald Link	Susan Moschella
Ronald Hollis	Samantha Link	Michnewich
Gail Holm	Abigail Lockhart	Sean Mosley
Ayesha Holmes	Virginia Lockhart	Khatija Moughal
Brenda Hood	Rebecca Loomis	Brittany Muse
Bethany Hooper	Fran LoPresti	Christina Narr
Alex Horn	Sarah Lutterodt	Judith Nassau
Christine Horn	Susan Lyke	Carl Nelson
Sharonda Huffman	Diana Lyles	Angelica Newsome
Felicia Hulit	Stephanie Lyon	Alfred Ngolle
Dorothy Hutchins	Abosede Malumi	Angela Nichols
Inge Hyder	Melvyn Marcus	Anna Nissen
Diana Insula	Lisa Marini	Jill Nolan
Mia Jackson	David Marker	Margaret Nyorkor
Latifah Johnson	Mary Marker Maureen	Kathy O'Donovan
Mary Ka Kanahan	Marshall Claritza	Carol O'Keeffe
Ed Kaplan	Marte-Hermon Avon	Kelly Obermayer
Ken Karinshak	Martin	Henry Oldfield
Kenneth Katzen	Eboni Massey	Eryka Owens
Seairra Keyser Eric	Andy Masters	Mary Pagan
Kielely	Shirley Matlock	Richard Pardoe

Kerrie Pariso	Shontrell Schumpert	Jasper Jefferson Vivar
Bethanie Parrish-Salaam	Jean Sedlacko	Ann von Lossberg
Deborah Parson	Monsio Seedee	Lawrence Walker
Kendra Parson	Eda Senveli	Kenneth Walsh
Marin Paul	Katie Shaw	BJ Walworth
Margaret Peak	Jane Sherman	david ward
Maria Perdomo	May Shing	Fran Ward
Emily Petersen	Mary Shippe	Margot Watson
Michael Phillips	Betsy Singer	Donna Weaver
Matthew Piotrowski	Betsy (Elizabeth) Singer	William Webster
Judith Pittman	Brett Sivo	Patti W Wecker
Dorothy Plantz	Lisa Skyaray	Valerie Weitz
Lauren Polon	Tamara Slade	Jean Weller
Steven Porter	Kinaya Smith	Linda Wengel
Susan Porter	Dana Sohr	Michael Werling
Kevin Powell	Jennifer Solpietro	Dipper Wettstein
Sandra Price	I Renate Soulen	Dennis Weyker
Susan Pumplun	Carol Ann Southard	Ruth White
Katherine Purcell	Charles Spearman	Susan White
Rachel Qualls	Megumi Spikes	Jonnie Widener
Shinae Rabey	Barbara Spittle	Cindy Williams
Kellie Racette	Cyntrell Stanton	Diondre Williams
Shantaya Rao	Andre Stephens	Gregory Williams
Rebecca Reese	Deloris Stephenson	Pamela Williams
Barbara Reinhardt	Maria Swaison	Trent Williams
Paul Revelle	Pat Sylvester	Michelle L Williams
David Rios	Anthony Tabb	Nicole Willis
Anna Rivera	Carol Tabb	Joe Willmott
Kelli Rives	Carolyn Taylor	Johanna Wilson
Mary Rodgers	Scotty Taylor	Melissa Wilson
Valerie Rogers	Cathy Teleky	Danielle Winston
Melissa Rosenberg- for Howard County Autism Society	Susannah Tetlow	Jasmine Wright
Cheryl Rowe	Otis Thomas	David Yood
Harry Rowell	Theresa Thomas	Levi Young
Helen Ruther	Victor Thomas	Tricia Zadjura
Sharon Sachs	Gail Thompson	David Zeitzer
Steven Sachs	Erika Tillery	
Rodrigo Saenz-diez	Michelle Tillman	
Vindra Saleh	Regis Tillman	
Bill Salganik	Dave Toomer	
Laura Salganik	Valerie Traore	
Denia Sanders	Jason Tripp	
Zita Saunders	Cheri Truett	
Brooks Schandelmeier	Keana Turner	
	Leslie Smith Turner	
	Anna Vianna	



June 14, 2023

Good Evening County Council Members,

I'm Jen Broderick, Executive Director of Bridges to Housing Stability, a nonprofit in Howard County Maryland. I served on the Housing Opportunities Task force, alongside many other nonprofit leaders and housing experts in this County. The report that came out of this group clearly showed that there is a severe lack of Housing opportunities for many populations in our community.

Bridges to Housing Stability has been a nonprofit focused on preventing and ending homelessness through affordable housing solutions since 1990. Housing prices have been soaring in Howard County for the past several years. 27% of households in Howard County are renters, and at least half of them are rent burdened. This number has probably increased significantly since the last Rental survey in 2018. Rents on even the Class C (more naturally occurring affordable housing units) went up dramatically during the Pandemic, greatly outpacing inflation rates and the modest income increases of minimum wage workers and fixed income renters including seniors and those with disabilities.

One of our primary activities at Bridges is to help rehouse households with limited incomes and those experiencing homelessness. Prior to the pandemic we rehoused most of our households in less than 45 days. Now it is taking two to four times longer. This is due primarily to the lack of affordable units for this population. Vacancies have always been low in Howard County, but now it is extremely difficult to find units for our clients. Vacancies don't even exist at most of the complexes we utilize with our clients. The longer individuals remain homeless, the more likely they are to lose their employment, children have trouble at school, their safety, mental and physical health are all affected more profoundly.

It isn't just low-income people that are impacted, it is also young professionals. One of my former interns has a master's degree in social work and is married. They are a two-income household. Yet despite this, when their lease was up for renewal and the landlord raised the rent \$450 a month, they couldn't afford it. They are saving to buy a home, and that would deplete their savings. They are now in the process of moving back in with their parents in Ellicott city because they can't find anything at the same rent rate they had this year.

The Case managers that work for Bridges have what would be considered livable wages in most places, making around 50-60% of Howard County area median income a year for a single individual yet they can't afford to live in the county that they work in. These are professionals with bachelor's and master's degrees.

I know several of you feel there are big flaws in the HoCo by Design plan. No plan is perfect. I've been in at least eight meetings with the HoCo by Design consultants discussing housing, and we helped make sure there were listening sessions with low income households struggling with housing insecurity giving their input as well. A big part of the housing portion of the plan discusses missing middle housing and I hope you will be open to the many possibilities this entails. We have to be open to creating more affordable housing, especially in ways that creates home ownership, and smaller additions to areas throughout the County. Instead of just thinking about large apartment complexes, we also can add units each year with Accessory Dwelling Units, Duplexes, and smaller townhomes. Smaller units like efficiencies and one-bedroom units also are great options for our aging population, our young adults, and single individuals and couples.

I am advocating that we keep building additional units with an open mind to creative solutions.

HoCo by Design creators were clear that the Board of Education will need to evaluate where to put more schools or expand current schools to accommodate the plan's objectives. They weren't tasked with addressing school crowding but rather were tasked with creating a blueprint for growth and laws such as the Appropriate Public Facilities Ordinance will have to be looked at because as it currently stands, almost zero building would be allowable for the foreseeable future. Our county will need more taxpayers, more growth, more revenue in the coming years to keep up with the needs of the current residents. As you all know, yearly costs like trash, water and sewer and maintenance of effort for schools goes up and unless you want to increase taxes on everyone each year, we need to have more jobs and more housing to stay a healthy thriving community.

Housing related calls to Bridges, and our partners in the Coalition to End Homelessness system at the Community Action Council, United Way, 211, and Grassroots Crisis Center have all increased by 25-50% more volume of housing related calls since 2020. Housing is a solution, and there just isn't enough of it.

Although short term assistance and subsidies help households for a while, the best way to help combat these rising rents is to allow affordable housing projects to move forward so there are more units available for these Howard County residents that can't battle the market rises alone. Supply and demand shows us that as long as there are scarcity of units, rents will continue to rise and price out our clients from getting into housing, and remaining stably housed. There are good solutions in HoCo by design to creatively allow more missing middle housing to grow in our county. This will benefit many of our seniors, and others on fixed incomes stay a part of our community and add more homeownership opportunities as well.

Affordable housing doesn't just mean apartments. The surrounding counties are moving forward with growth that allows for people of all incomes to have housing through rentals and purchase programs. I ask that you support Howard County doing the same.

Thank you so much for giving me this opportunity to submit this testimony to you on this important topic. I attended the rally today and hope that you will be open to what our many voices have to say.

A handwritten signature in blue ink that reads "Jennifer Broderick". The signature is fluid and cursive, with the first name "Jennifer" being larger and more prominent than the last name "Broderick".

Jennifer Broderick, LCSW
Executive Director
Bridges to Housing Stability, Inc.
9520 Berger Rd. Suite 311
Columbia, MD, 21046

Good evening, council members. My name is Jennifer Solpietro, and I am on the Board of Directors of the Howard Progressive Project and a member of the Howard County Housing Affordability Coalition. I am a resident of Harper's Choice Village in Columbia, in District 4.

Some of you on the dais may have cringed when you saw my name, given that I've aimed plenty of criticism your way in recent years. But I'm hoping that you'll hear me out, because I'm here testifying in person, for the first time ever, to show you that I'm here in good faith to ask you to do more for affordable housing.

Last month, I was at a doctor's office at Howard County General Hospital. As I waited to be seen, I overheard the nurses and technicians chatting together. One woman asked another how her house hunting was going, and she said, "We finally found one out in Mount Airy...we couldn't afford to buy anything here."

I wondered to myself how many other people in Howard County face similar struggles when it comes to housing affordability.

The United States Department of Housing and Urban Development defines "affordable housing" as costing no more than 30% of a household's gross income. In Howard County, more than 13,000 households pay more than 30% of their gross income on rent. Six thousand eight hundred of them pay 50% or more. The waiting period for a Housing Choice voucher – if you managed to get on the waitlist before it closed in 2012 – is a decade. Meanwhile, the vacancy rate for subsidized units in Howard County is currently – and perpetually – zero.

I'd like to ask you to imagine for a second what that's like. Imagining having to live by the mantra "the rent eats first," forgoing not just non-essentials, but also basic essentials, just to afford rent. Imagining living with the constant stress of knowing that falling behind on the rent is the first step into the quicksand of eviction and homelessness. Forget about getting a subsidized unit – there aren't nearly enough of them. And forget about the dream of homeownership – you can't afford to buy a home here, and you can't afford to save money for one, either. All you can do is work as many hours as you can and make difficult budgetary choices to ensure you keep a roof over your family's head.

As of this writing, there are 548 students in the Howard County Public School System – enough to fill an average middle school – who are currently living the nightmare of homelessness. Scores more HCPSS students live in households who are one car breakdown, one medical catastrophe, or one lost job away from meeting that same fate. Many of these HCPSS students have jobs – not for earning spending money, or to save for college, but to help their families pay the rent every month. Imagine what it's like to be them.

And then imagine one of the many zoning board meetings or county council hearings where one affluent Howard County homeowner after another sits at the microphone to testify as to why affordable housing must wait, because we have enough housing already, or our schools are too overcrowded. And finally, imagine watching your county council representative vote against a

subsidized housing development or vote for a policy change that will add yet another barrier to building the very kind of affordable housing that you and your children need.

How do you feel right now?

Councilmembers, these people and families who struggle like this are your constituents. They are our neighbors. They are our children's classmates and friends. They are hard-working, taxpaying citizens of this county who deserve to have their basic human need for shelter to be treated as a priority by their government so that they can achieve the American dream.

HoCo By Design is your opportunity as a legislative body to elevate the voices of our homeless, housing-insecure, and rent-burdened neighbors, and finally treat affordable housing as the basic infrastructure that it is.

As Matthew Desmond said in his book, *Evicted*, "Without a home, everything else falls apart."

Thank you.



**General Plan Testimony for June 14, 2023 Public Hearing
League of Women Voters of Howard County**

To: Chairperson Christiana Rigby and the Members of the Howard County Council

Thank you for the opportunity to participate in the public discussion of HoCo By Design and the impact it will have on Howard County now and in the future.

The League of Women Voters of Howard County has been involved in advocacy related to land development and housing for a number of years, and we have been following the evolution of this new general plan closely. As an organization that values research and consensus, we are pleased with the work the county has done to study the issues from all sides and to involve a diverse array of stakeholders in developing the HoCo By Design plan. We also support the intentional focus on equity within each branch of the plan.

Affordable Housing

The League is well-aware of the immense growth Howard County has experienced and will continue to experience over the next decade and more, and how this growth makes it imperative for us to increase the number of housing units. We are also aware of how current housing shortages, and the resulting increases to housing costs, have created an affordability crisis that impacts everyone in the county, including those who protect, serve, and teach in our communities.

As many of you on the Council may already know based on our past advocacy, affordable housing is an issue of great importance to the League. We believe that citizens deserve an adequate housing choice, in a suitable living environment, within the economic reach of persons of all ages.

We support HoCo By Design's plan to address low-income housing as well as the "missing middle" through the diversification of new housing construction, especially the focus on multi-family units, smaller units that enable home ownership for low to moderate income individuals and families, mixed-use buildings, and changes to zoning codes that allow the use of ADUs.

However, as members of the Affordable Housing Coalition, we believe that, in light of the severity of the affordability crisis in Howard County, this plan does not go far enough in its requirements for affordable units in new housing construction.

Specifically, we believe that the plan should be amended to state that:



At least 2,000 new homes should be built each year, of which 25%, or a minimum of 500 homes, should be affordable to households earning below 60% of the median income. Of these affordable homes, we agree that at least 10% should support residents with disabilities.

Transportation

Transportation is both a key issue for us as a growing county and a subsidiary issue related to affordable housing. It's not enough for someone to be able to own a home or pay reasonable rent – they also need to be able to reliably access workplaces and commerce centers from their homes.

Additionally, as population and construction increase, the County will need infrastructure that accommodates more people traveling through more crowded spaces. Therefore, the League supports HoCo By Design's investments in increasing and improving public transportation, especially the new Downtown Columbia and East County Transit Centers, new park and ride lots, and County-supported improvements to MARC stations/lines, as well as building new walking and biking pathways to connect housing and commercial areas.

Environmental Impact

Protecting and preserving our beautiful county is also of great importance to the League, and we support HoCo By Design's ecological health implementation actions as outlined in the plan.

Public Schools

Finally, the League is invested in promoting equity in education, which includes ensuring that all students attend schools that provide adequate space, well-maintained facilities, and a healthy environment. We support HoCo By Design's plan to address both population growth and extensive deferred maintenance by renovating Oakland Mills Middle School, Dunloggin Middle School, and Oakland Mills High School, and by increasing space at Hammond High School.

In summary, the League is highly supportive of HoCo By Design, with the only caveat being that we believe it includes insufficient requirements for affordable housing. We urge the county to pass this plan with an amendment that requires 25%, or at least 500 new homes, to be affordable to households earning below 60% of the median income.

Thank you again for your time and consideration of our testimony.

Sincerely,

Krista Threefoot
President, LWVHC

June 14, 2023

Testimony on General Plan Chapters of Hoco By Design

Good Evening Council Members. I know you will be hearing a lot on this matter, mostly regarding general positions. We the "Peoples Voice" would like to suggest a few specific edits. The current draft plan has a lot of commendable goals, but we believe that some supporting data may be based on some inaccurate assumptions. In order to balance a broad spectrum of County needs we would like to recommend a few specific edits, especially regarding the implementation areas.

We agree that the General Plan is indeed supposed to be "general" and Implementation is done over time, starting with zoning changes, followed by development plans showing cohesiveness with the plans goals. Since the general plan has set a high priority goal of increases in residential development, especially with regard to assumptions that those efforts will provide more affordable housing units, it becomes very important to include language in the implementation suggestions, to make sure that goals are met and the assumed benefits are provided.

Here are a few of our recommended edits to the General Plan:

1. Chapter 1 – Regarding Missing Middle income housing, we completely agree with the need to have Middle Income housing in the county, but this goal has been circumvented by the developers in the past by using the "Fees in lieu" provision. Thus, please edit the implementation goals to include well defined pre-conditions to get the benefits, waivers and fast passes. We recommend that words such as "significant units" should be more specifically and objectively defined.
2. Chapter 5 p. 37 #2 – We recommend adding additional language to safeguard the buffering requirements of new high density activity centers coming up next to existing neighborhoods, many of which are located next to old neighborhoods and shopping centers right next to R20 zones. We recommend that the general plan be edited, from where it notes implementation goals to "allow sufficient density in activity centers..." to ADD "along with improved buffering and retained environmental protections." Same buffering language should occur in Chapter 6 p. 44 implementations. This edit will help ensure that high density development does not override all other land use responsibilities.
3. Chapter 6 p. 49 – Again, the affordable overlay should define at a minimum of what we mean by "significant portion" of units.
4. Chapter 6 p. 51 implementing actions – 4 d – Here is an example of where the General plan provides specific exemptions in APFO with regards to the school requirements, without requiring a minimum amount of affordable housing to get this benefit. We believe that the General Plan's assumption that providing specific exemptions will help in reaching affordable unit goals without any suggested requirement on the amount of provisions by a project is a recipe for not meeting this goal at all, and it being taken advantage of by the developers. Please do NOT assume anything, and clearly articulate the county's expectations for providing the benefits to the high density developers.
5. The General Plan continues to misinterpret the HCPSS feasibility study regarding sourcing of new students from development vs. resales. In Chapter 10, data is presented as to how low a percentage of new students come from new homes. It is clearly and honestly noted that "new" homes are being defined as new occupancy permits in the last year. See p. 22 1-c.

The People's Voice, LLC

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We believe that it is illogical to plan for long term land use while still accepting that “new” housing continue to be defined as a new occupancy permit issued in the last year? These new homes will continue to feed into the school system in the future too and should be included in calculating the projected school capacity.

We recommend adding item “vi” to page 22, Implementations in the School Chapter - Add item to say “Collect Data Sets on sourcing of student enrollment to define a new development beyond one year old units.” The increase in the impact fees were calculated based on the assumption that resales made up the rest of student enrollment and not new development beyond one year. This is not a good myth to keep using in planning.

To end on a compliment, Chapter 10 p. 54 explicitly states the General Plan’s goal of a “one-on-one replacement of affordable units in redevelopment.” We would like to see such specific language in the sections mentioned above too.

Thank you.

Lisa Markovitz

President, The People’s Voice