



August 7, 2023

Howard County Council Members
George Howard Building
3430 Courthouse Drive
Ellicott City, MD 20104

Re. CB 28-2023 testimony addendum

Dear Council Chairwoman Rigby, Co-Chairwoman Jung and Council members Jones, Walsh and Yungmann,

Please consider this letter an addition to the Coalition's testimony at the July 19 HoCo By Design Public Hearing.

A comment was made during the Council's July 26 HCBP Work Session that correctly noted each of the recent General Plans have had an overall theme or primary goal. The 1990 Plan focused on controlling growth. The 2000 Plan focused on regionalism and preservation of the West. The current Plan 2030 is primarily devoted to developing Downtown Columbia. The Coalition strongly believes that HoCo By Design—the County's next General Plan—appropriately establishes affordable housing as a primary focus and provides the policy framework for addressing the current and projected housing needs for County residents at all income levels, but particularly for households earning less than 80 percent of area median income (AMI).

These comments address the Report's Dynamic Neighborhoods chapter recommendations, specifically discussions of Missing Middle Housing, Activity Centers, Age Friendly and Accessible Housing and Homelessness. Each of these elements of the HCBP strategies are fundamental to enabling the County to take meaningful action that will result in rectifying the current (20,000) and projected future (31,000) undersupply of rental and home ownership housing options.

Missing Middle Housing

HoCo By Design and Housing Opportunities Master Plan studies have shown that there is a particularly significant undersupply of rental and ownership housing options for households that make between 40 percent to 80 percent AMI. This is the housing that is needed for many sectors of the County's public and private workforce, including health care, education and public safety personnel and service industry workers. Options are also severely restricted—and essentially non-existent—for seniors seeking to downsize, people with disabilities and young professionals seeking to live independently. Regulatory barriers, limited precedent, and uncertain returns on investments are noted in the Dynamic Neighborhoods Chapter as obstacles to the creation of the "missing middle" housing typologies that middle income wage earners cannot now find in Howard County.

Policy Statement DN 4 would *“allow the development of small-scale missing middle housing and accessory dwelling units (ADUs) that respect the character and integrity of their surroundings and meet specific site conditions in single-family neighborhoods.”* The associated implementing actions provide clear protections that would respect a neighborhood’s character while allowing use of a diversity of housing types to respond to the broader Howard County community’s unmet housing need for renters and those seeking homeownership.

The potential of updating **New Town** zoning to allow development of missing middle housing options can be a major contributor to resolving the current and projected housing imbalance. New Town is an opportunity that should be more strongly emphasized in this Report. If it is not, this central residential area of our community will have been largely ignored since at least the 2000 General Plan (regionalism and preservation of the West were the focus) and possibly not since the 1990 General Plan in which growth control was one of the Plan’s primary goals.

The Dynamic Neighborhoods chapter does a thorough job of defining and explaining the value of the various types of **Accessory Dwelling Units (ADUs)**. The Chapter also recognizes some community concern about the impact of ADUs on parking, the environment and neighborhood character. The Coalition concurs with the Chapter’s conclusion that regulatory tools can be adopted to minimize these potential impacts. The Implementing Actions associated with Policy Statement DN 2 provide a sound framework for ensuring ADUs are both an additional option in the affordable housing toolbox and an opportunity to support individual homeowners to use their property in support of their personal need(s) whether that be space for a family member, as supplemental income, or perhaps as a home to age into themselves.

The Coalition also supports Dynamic Neighborhoods Policy DN-8 that would *“Create opportunities to increase the diversity of home choices in the **Rural West**, especially missing middle housing types that preserve the West’s rural character.”* This policy statement particularly responds to community calls for geographic dispersion of low and moderate income housing across all parts of the County. The stated implementing actions would allow development of ADUs, locating missing middle house typologies in the Rural Crossroads, on-site tenant housing for agricultural workers, and the identification and strategic locations for shared or community wells and septic systems. The fifth (5th) implementing action recognizes that to accomplish integration of new housing typologies in the West will require greater flexibility of zoning, land development and other code changes for “small-scale, context sensitive, multi-family or mixed-use development.”

Activity Centers

The Coalition concurs with the Report’s statements that Activity Centers can contribute to housing equity and de-concentration of low-income household neighborhoods. Inclusion of diverse mixed-income housing as village centers are redeveloped, for example, will increase the County’s low, moderate and market rate housing inventory and in doing so will help economically diversify current concentrations of poverty, particularly in Columbia. Development of new activity centers that are inclusive of mixed income rental (apartment) and ownership (town house/condominium) housing in the areas of Clarksville, Highland, Fulton, areas adjacent with Montgomery County and Gateway will further help with de-concentration.

The Dynamic Neighborhoods Section recognizes the importance of the future **Gateway Regional Activity Center** (an area twice the size of Downtown Columbia) in meeting the County’s housing, commercial and revenue expansion needs. In Technical Appendix C, the Report supports development of a Gateway Master Plan and provides a set of general concepts to be considered when that Plan is developed. The Report however stops short

of recommending a timeframe for development of the Master Plan and does not establish any growth targets upon which the Plan should be founded. We know from experience that the Plan 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 Gateway process begin on an expedited basis. The Coalition therefore recommends integration of a Policy Statement into the Dynamic Neighborhoods Chapter, Activity Centers section that reads: ***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.***

Age-Friendly and Accessible Housing

The Dynamic Neighborhoods Terms section includes the definition of Income Restricted Housing—“Low Income Housing Units (LIHUs)—units that must be reserved for low-income households at reduced rents or purchase prices and Disability Income Housing Units (DIHUs)—units that must be reserved for households receiving a disability income.” The policy statements and implementing actions however do not specifically include this housing element that is critical to serving the needs of low income seniors and people with disabilities. The Coalition recommends modifying Policy Statement DN 3 to read: ***Incentivize the production of income restricted and other housing units affordable to low- and moderate-income households, beyond what is currently required by the Moderate Income Housing Unit (MIHU) program;***” and modifying the associated Implementing Action #3 to read: ***“Incentivize the production of Low Income Housing Units (LIHUs) and Disability Income Housing Units (DIHUs) housing units affordable to low- and moderate-income households, beyond what is currently required by the Moderate Income Housing Unit (MIHU) program.***

We further recommend modifying:

- Policy Statement #5, Implementing Action #4 to read: **Establish a working group to evaluate the feasibility of a targeted incentive program for affordable and accessible housing, including:....**
- Policy Statement #6, Implementing Action #4 to read: **Offer additional incentives to encourage the production of more Moderate Income Housing Units than required, and/or deeper levels of income targeting in the form of Low Income Housing Units or Disability Income Housing Units.**

The Dynamic Neighborhoods chapter also states that seniors in our community specifically note the need for “more opportunities for communal living, small housing options that allow older adults to downsize, greater flexibility to make accessibility modifications to homes, updated universal design guidelines, and greater opportunities for attached and detached accessory dwelling units (ADUs). This statement is also relevant to the housing needs for people with disabilities. The HCBG Strategic Advisory Group and the Housing Opportunities Master Plan both recognized that missing middle housing, particularly if located in Activity Centers, are critical to responding to both these populations. Policy Statements DN 11 and DN 12 provide the framework that will be critical to resolving these current and growing unmet community housing needs.

Preservation-Revitalization

The Coalition appreciates the Dynamic Neighborhoods chapter’s recognition that preservation of current affordable housing and revitalization of aging neighborhoods must be a critical part of a comprehensive housing strategy. Policy statements DN 13 and DN 14 and the associated implementing actions get on the record the importance of preserving affordability and offer revitalization guidance, but do not sufficiently impart the criticality of not losing even one unit of affordable housing. We therefore recommend a new Policy Statement DN 13 (shifting current 13 to 14 and 14 to 15, respectively) based on the HOMP recommendation: ***“Establish a goal of zero net loss of existing housing affordable to households with incomes below 60% AMI while adding new affordable units to the County’s housing inventory.”***

Homelessness

Howard County’s strategic plan—The Path Home—recognizes that homelessness cannot be resolved without additional new and diverse housing options. The Coalition recommends broadening Policy Statement DN 15 to reflect that there is not only a growing need to provide shelter and permanent homes for households who are “un-housed,” but also for households that are unstably housed because of unaffordable rents. We recommend

revising DN 15 as follows: ***“Increase access to and availability of affordable housing for Howard County residents experiencing or threatened with homelessness.”***

Thank you Council members for your consideration of the Coalition’s testimony. We are available to discuss the Coalition’s perspectives and recommendations.

Respectfully submitted,

Housing Affordability Coalition Steering Committee Members

Cedrick Brown, Paul Casey, Tom Coale, Joan Driessen, Jackie Eng, Peter Engel, Grace Kubofcik, Grace Morris, Vonda Orders, Rich Pardo, Paul Revelle, Jean Sedlacko, Dana Sohr, Pat Sylvester, Joe Willmott, Phyllis Zolotorow

