




OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich  
*County Executive*

MEMORANDUM

March 18, 2024

TO: Andrew Friedson, President  
Montgomery County Council

FROM: Marc Elrich, County Executive 

SUBJECT: Equity Analysis of the Takoma Park Minor Master Plan Amendment

The attached documents are being sent as supplemental information to my memo of February 16, 2024, on the Takoma Park Minor Master Plan Amendment. The first attachment is an equity analysis; the second is a supplemental memo from DOT on the transportation impacts of the proposed Plan.

The equity analysis was commissioned by the Executive Branch since one was not conducted by the Planning Board. Although the consultant had an extremely short time period to conduct this analysis, the resulting report demonstrates why a racial equity analysis is an important first step in master and sector plan reviews; it raises several important points that I hope you will consider before you take further action on the Plan. We contracted with the same consultant who provided the racial equity analysis for the Thrive 2050 general plan, so they are familiar with Thrive and the county.

While I may have additional comments, I am eager to get this analysis to you as quickly as possible. For now, I want to point out that at the Council review of the plan, Councilmember Jawando stated he understood that unless projects for individual large apartment buildings included no-net-loss, the project would not be approved, and Planning Board Chair Artie Harris agreed with this statement at the session. However, as far as can be determined, nothing in the plan explicitly requires building specific no-net-loss. Such a goal is only aspirational without a clear explicit requirement in the plan.

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I am also sharing the equity analysis with the Takoma Park Mayor, Takoma Park City Council, and residents per their request. My staff is available to answer any questions you may have and participate in any discussions.

ME:ds

Enclosures: Racial Equity and Social Justice Review Memo;  
DOT Supplemental Memo

cc: County Councilmembers

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March 18, 2024

## TAKOMA PARK MINOR MASTER PLAN RACIAL EQUITY AND SOCIAL JUSTICE REVIEW

### INTRODUCTION

CHPlanning reviewed the Takoma Park Minor Master Plan (TPMMP) at the request of the Executive Branch of Montgomery County Government. This review was initiated due to expressed concerns of potentially adverse impacts the land use and policy changes recommended in the current draft of the TPMMP could have on minority, immigrant, low-income, and other vulnerable communities living in Takoma Park, Maryland. This memo reflects our work to review the draft plan, contextualize the information within the plan, and identify areas where the plan recommendations support or undermine the broad goals of racial equity and social justice.

### DEFINING RACIAL EQUITY AND SOCIAL JUSTICE IN PLANNING

Urban Planning is the process by which communities build consensus around a shared vision for the future. Any attempt to infuse racial equity and social justice into planning must carefully consider the history of dehumanization, dispossession, and displacement endured by Indigenous, African American, and other racial and ethnic minority communities and seek to repair past harms.

**Equity** in planning requires fairness, but this is not the baseline. The baseline for equitable planning must have the stated goal of working to uplift economically and socially disadvantaged communities through the creation of policies that prioritize meeting the needs of the most vulnerable residents. From a racial standpoint, this work requires a culturally competent and context-sensitive examination of racialized socio-economic factors and creating policies which seek to address the disproportionate adverse life outcomes for “people of color” compounded over time.

**Social Justice** is the process by which working-class people begin to access the privileges primarily enjoyed by the privileged class[es]; to afford healthy lifestyles, to have access to economic opportunity, and to experience education and built environments which inspire them to lead happier, healthier, and more productive lives.

Achieving racial equity and social justice requires a radical departure from the status quo. **As a plan is aspirational, it should be ambitious.** Social Justice demands that we push beyond minimum standards towards achieving (people-focused) best-case scenario planning that shows a clear preference for rebalancing opportunity towards disadvantaged communities.



## TAKOMA PARK MINOR MASTER PLAN

As the primary objective of this Minor Master Plan Process is to facilitate redevelopment of the Washington Adventist Hospital Campus, to ensure equity, the resulting planning should steer development towards replacing the community benefit lost from the hospital use to one that has roughly proportional benefit gains for the community. This process should consider social and economic factors, and seek to leverage resources and steer wealth-building opportunities to benefit the working-class and other vulnerable communities that live, and or work in Takoma Park. Special consideration should be given to households who have been long-time renters in the area when it comes to targeting homeownership opportunities and other resources and/or incentives.

### EQUITY CONSIDERATIONS for the TPMMP:

- Do authentic community engagement which seeks to establish a two-way learning process that is transparent, strengthens capacity, repairs relationships, and delegates power – enabling residents to directly inform policies impacting their community.
- Make low-income and other vulnerable households more housing secure.
- Identify development scenarios that allow you to provide more housing and services for vulnerable populations, such as seniors, low-income, disabled, returning citizens, unhoused, etc.
  - “No net loss” should also consider economic and social impacts, and we should be looking to increase the affordable housing inventory, not just replace the existing inventory.
- Identify and help facilitate new economic opportunities for existing residents.
  - Prioritize creating homeownership opportunities for long-time rental residents with things like condo conversions, co-ops, rent-to-own, etc.
- Identify and help facilitate community development strategies and initiatives.
- Define clear strategies for change management to promote stability and minimize disruption to vulnerable residents’ lives if redevelopment occurs.

### OPPORTUNITIES

- New development [needed density] can be achieved at the hospital site and adjacent properties. This is a big opportunity to generate MORE affordable housing and help economically integrate Takoma Park, which is overall an affluent area. This development opportunity also has the potential to increase retail and service delivery for local residents and should support replacing some of the services and jobs lost with the hospital leaving with uses desired by the community such as medical office and a daycare center.
- If the Maple Avenue corridor is redeveloped, stronger change management strategies should be crafted, with the community, to protect residents from displacement. These strategies should ensure that as the area changes, residents are able to remain, even during the construction phases. If done well, this could be a successful case study of how to do development without displacement, which would be celebrated as a best-practice and earn the municipality and County positive recognition.

### RISKS

- Displacement – upzoning on its own isn’t bad, but when you upzone it increases land value and speculation, which can trigger market reactions that lead to displacement of vulnerable residents.

#### Associated Risks

- Increased housing prices.
- Predatory RE practices.
- Redevelopment:
  - Rent Stabilization Time Lapse (5 year)
  - Inadequate change management to successfully facilitate right-of-return for residents.
- Inadequate property management/maintenance.
- Traffic/safety impacts – this corridor (Maple Avenue) is already densely populated and has relatively heavy traffic, thus, creative solutions will be needed to address safety and mobility if further density is added. Furthermore, increasing population density can also put a strain on the social fabric of the community.

## PRIORITIES

- Development without Displacement – demonstrate a firm commitment to no-net loss policies at comparable or lower price points, and change management techniques that ensure residents are not displaced during redevelopment but are able to stay in the community as the multi-year redevelopment process unfolds.
  - Strengthen existing community resilience as they prepare for incremental influx of new residents.
- Create a strong plan for change management which enables local residents to benefit from new development and ensures that families experience minimal disruption to their life as the community changes around them.

## PLAN COMMENTS BY SECTION

### ABSTRACT

Does not mention/prioritize equity...

### INTRODUCTION

Takoma Park prides itself as being “well served, diverse, and progressive” – but acknowledges (in History section) that this diversity was achieved through the development of multi-family housing. To preserve the character of Takoma Park, it is essential that neighborhoods with affordable housing are protected and new opportunities to develop additional affordable housing units (to increase the overall volume of affordable housing) are promoted.

### BACKGROUND

Plan Area Boundary – How is this decided?

While it is assumed that the Minor Master Plan was initiated to address redevelopment of the Washington Adventist Hospital site, it is not clear why the corridor along Maple Avenue was included in the plan boundary. It seems arbitrary to include this area in the plan which is physically separated from the Washington Adventist campus by Sligo Creek.

### HISTORY

Some good historical information is provided, but more depth and further study are needed to demonstrate the roots of racial and economic disparities in the area. Highlights that multi-family housing was key in creating diversity in the area.

### EQUITY

This section provides very limited (2) recommendations, much more can be done to bolster this section. Suggest incorporating material from this memo and the Thrive Racial Equity and Social Justice Chapter.

### COMMUNITY ENGAGEMENT

The engagement write-up paints a picture of a robust effort, but upon closer examination of the engagement appendix, it appears there were some gaps. These are discussed in the conclusion.

### VISION

This section is straightforward, but could be strengthened by making more specific overtures to racial equity and social justice issues with themes such as “acknowledging the past” and “working to repair harms done to African American and other minority communities”, etc.

### ZONING

This section is standard, should remove CRN zoning since it does not require public benefits. Could add more detail about how the zoning designations will promote development of affordable housing and why the previous overlay zones are obsolete.

### SCHOOLS

The plan does not clarify if there was community feedback on the preferred alternative for the Elementary School site. It is assumed that residents do not want the school to move to another area.

## MAPPING SEGREGATION

It would be good to have some recommendations about how in the areas where there were historically restrictions on sale, lease, and rental of properties to African Americans we can support greater integration of these neighborhoods.

## CONNECTIVITY/GREEN INFRASTRUCTURE/TRANSIT/RESILIENT

These sections generally align with Equity and Social justice goals. It is still important to call out that as these efforts are being implemented, the most vulnerable communities are centered in the process to ensure context-sensitive strategies that truly support health, safety, and mobility for all modes. Furthermore, it will be important to prioritize efforts which benefit vulnerable populations first.

## ENVIRONMENTAL EQUITY

This section should look at any Environmental Justice considerations in the area, including, but not limited to the quality of housing, and any associated health and safety risks posed to vulnerable residents. This section needs more analysis of EJ considerations in Takoma Park, not just a mention of efforts to come.

## HOUSING

Important to put “teeth” (stronger language) behind the goals to make housing more affordable and attainable, while preserving (and improving) existing affordable housing.

- Takoma Park, across the board has relatively high home values, and high household incomes when compared to the County as a whole. As such, increasing access to affordable housing in the area is a key strategic goal to increase social equity and economic integration of the area.
- More work needs to be put into understanding how to preserve naturally occurring affordable housing and establishing new affordable housing to ensure that Montgomery County does not lose the rich diversity, both racial and economic, to make it a complete community.
- No net loss does not go far enough if the price points of new [affordable] units are not comparable to the ones lost. Currently, many families are extremely cost-burdened, so even a small increase in rent can make staying in Takoma Park very difficult. It needs to be clearly defined in the plan that there needs to be housing development supported which creates cheaper options for families, not just affordable based on the standard MPDU metrics.

## DISTRICT RECOMMENDATIONS

Generally, this chapter contained good recommendations.

- Municipal District (no comments)
- Maple Ave
  - This section needs stronger language to support preservation of affordable housing and measures to improve property management/maintenance.
- Flower Ave
  - There is no mention of affordable or supportive housing or any other equity considerations on the Washington Adventist site. The previously stated and omitted equity goals need to be woven into this section.
  - Lost medical use is HUGE for the community from an employment and services standpoint, this needs to be addressed in the recommendations:
    - Redevelopment on site should: “seek to replace the economic and social benefits provided to the community by the hospital use...”

## CONTEXT

### NEIGHBORHOOD CHANGE STUDY – “CONCENTRATIONS OF POVERTY”

Declaring people’s fear of displacement as a “perception” while directly stating that the biggest issue is “concentrations of poverty” that need to be ‘diluted’ with new development is exactly the type of rhetoric that justifiably stokes the fear of displacement. A community represented as “concentration of poverty” still has significant value, and often times these communities are equipped with collective patterns of resilience that help local residents survive, whether it be informal social networks, faith-based communities, cultural institutions, etc. It is imperative that we begin to appreciate low-income people’s communities have value, they have tradition, and most importantly, they have things worth preserving, starting with the people.

Observations of local context:

In Takoma Park, the context needs to be considered more regionally. While a “concentration” of affordable housing exists in Takoma Park, the surrounding neighborhoods are quite affluent, and the overall health of the municipality is robust. Low-Income residents living along Maple Avenue have tremendous proximity to schools, city services, and community amenities such as Sligo Creek Park. Residents in this area enjoy a quality of life that may be significantly compromised if forced to relocate somewhere else. In addition, the potential loss of stability of belonging to a community and then having to re-adjust to a new place where you do not have established relationships, is a significant challenge which has many negative ripple effects for working-class and minority families.

While currently, the Maple Avenue Corridor does not register in the Montgomery Planning’s Neighborhood Change Analysis Tool as a “displacement risk”, the surrounding neighborhoods (Sligo Park Hills, North Takoma Park, and New Hampshire Gardens) are experiencing moderate displacement with many low-income residents leaving the single-family neighborhoods. With a rezoning, and subsequent redevelopment, these external factors indicate that economic pressure on low-income families could very well rise beyond their capacity.

As a municipality, Takoma Park needs to increase its affordable housing stock to make the social-economic balance more even. For “concentrations of poverty” this means prioritizing community and economic development and ensuring that the important work of outreach is being done effectively.



## INCORPORATING THRIVE

**Complete Communities** must prioritize class considerations in its analysis. When planning for neighborhood change, planning should be looking for opportunities to give MORE lower-income households access to affordable housing in affluent areas and employment centers.

### Housing

Thrive's Racial Equity and Social Justice Chapter asks plans to consider the following housing considerations:

- Development without deliberate community and neighborhood conservation efforts will almost certainly result in (some) displacement. Develop clear strategies to give people options during the redevelopment process.
- In order to balance the economic integration of low-income neighborhoods, some accommodation for rebalancing should be made to ensure that economic benefits begin to reach historically disadvantaged populations.
- Integration should be a two-way process, by which there should be a parallel strategy of making accommodation for low-income housing in areas which are already wealthy and thus providing new residents with proximity to jobs, good education, services, etc. If we are going to promote development in the growth areas with new market-rate housing, there should also be provision of new low-income housing in high income areas to allow for housing choice in different markets.

### Cultural Competence

It is vital to have practitioners who can relate to the communities they serve. In executing planning in communities of color, practitioners must lead with deference. Being able to understand cultural cues and nuance plays a large role in comprehension and meaningful engagement. If communities feel that they are not being respected or understood, real conversations will not occur.

### Community Development

The County has a tremendous opportunity to develop partnerships with its communities that it can leverage to rebuild trust, strengthen relationships, and celebrate everything that is great about the region. Montgomery County has had success with diversifying by implementing inclusionary zoning in the 70's and 80's. Now, it is important to do the work to protect those existing communities. Planning should seek to leverage and strengthen the existing social networks and identify opportunities to empower local actors to be directly involved in the work of community development.

### Economic Empowerment

Throughout the public engagement process, it was clear that displacement is a big fear for residents with less means, as they are witnessing escalating [home] prices. The vast majority of working-class people expressed that they want access to better education and economic opportunity. Most people who struggle to make 'ends meet' prioritize economic advancement as their number one priority and planning for their communities should reflect that reality.

## CONCLUSIONS

On the surface, the Takoma Park Minor Master Plan Amendment is aligned with the goals of racial equity and social justice, but much of the facially neutral language within the plan poses a potential threat to vulnerable communities in Takoma Park. There are a few significant gaps in the plan that could lead to real harm to or push-back from vulnerable communities:

### ARBITRARY PLAN BOUNDARY

It does not appear there is a clear rationale provided for why a large swath of multi-family properties are included in a Minor Master Plan aimed at addressing the redevelopment of a hospital campus. This discrepancy does not seem to have been broadly discussed during engagement efforts either. If the goal is to preserve existing affordable housing, then the upzoning should come with stricter stipulations and/or affordable housing allocations beyond the minimum. Rezoning could also be limited to the Washington Adventist Hospital Campus or allow less density along Maple Avenue to reduce speculation pressure.

### COMMUNITY ENGAGEMENT GAPS

The Planning Department did well to invite Everyday Canvassing in to speak with multi-family residents, but the questions posed generally focused on the Washington Adventist site and residents were not informed or asked about zoning changes impacting their place of residence (along Maple Avenue). Workshops or charettes should have been held with residents of buildings along Maple Avenue to get their feedback on how a potential rezoning (and subsequent redevelopment) could be managed for minimal disruption to their lives. This discrepancy could lead to residents feeling blindsided down the road.

Furthermore, there is a lack of evidence that the community's key concerns were incorporated into the plan's vision and recommendations. The community explicitly talked about the hospital representing a critical employment and public health asset for their community, several people moved to Takoma Park area partially because of the hospital. Residents expressed wanting to see some kind of (small-scale) healthcare use, daycare, and affordable housing developed on site. Listening is the planning practitioners first job, and it is quite clear that people who are residents of the (multi-family) properties in the plan area want to see their community improved, not razed and redeveloped.

### WEAK LANGUAGE

We will never get anywhere close to approaching justice if we are not firm in our demands. If the planned redevelopment of this area is going to be inclusive and equitable, then very direct language about race, class, and power needs to be included in the plan. We must acknowledge that historical segregation and disinvestment is not the only issues here, but current day social exclusion, imbalances of wealth and power are still heavily skewed towards (predominantly) white communities. Addressing poverty in low-income areas by bringing in new people is not enough; efforts need to be made to uplift the people currently in these communities so that people without privilege can benefit from new development instead of them experiencing increased housing instability and social pressures.

The plan needs to call out exactly how development in the future should change, and always prioritize benefits for vulnerable communities by promoting community development and economic empowerment.

Marc Elrich  
County Executive




Christopher R. Conklin  
Director

DEPARTMENT OF TRANSPORTATION

**MEMORANDUM**

March 1, 2024

**TO:** Marc Elrich, County Executive

**FROM:** Christopher R. Conklin, Director 

**SUBJECT:** Takoma Park Minor Master Plan Amendment  
Transportation Impacts – Supplemental Memo

In a memorandum dated January 25, 2024, the Department of Transportation provided a review of elements associated with the Takoma Park Minor Master Plan Amendment (the Plan) outlining the increased intensity of use along Maple Avenue and Flower Avenue in Takoma Park in the “Municipal District”, the “Maple Avenue District”, and the “Flower Avenue District”. The increased intensity of use, estimated to include 901 additional vehicle trips, is anticipated as a result of the delivery of the 3,500 additional housing units in the plan area.

As a supplement to information included in the previous memorandum, MCDOT determined the approximate number of vehicle trips, generated by the proposed housing units, that are anticipated to use MD 410 (Philadelphia Avenue) between Maple Avenue and MD 320 (Piney Branch Road) and Flower Avenue, north of Carroll Avenue. Based on the additional 901 vehicles, it has been estimated that 265/248 (AM/PM) additional peak-hour vehicle trips will use MD 410 to the west and Flower Avenue to the north/east.

MD 410 Inbound: 19/(77)  
MD 410 Outbound: 162/(58)  
Flower Avenue Inbound: 32/(72)  
Flower Avenue Outbound: 52/(41)

The remaining additional trips are anticipated to utilize Carroll Avenue, MD 410 south of Maple Avenue, Flower Avenue from the south, Maple Avenue from the south and Sligo Creek Parkway and Hilltop Road.