

Takoma Park Minor Master Plan Amendment: A Broken Promise on Racial Equity

As you review the draft Takoma Park Minor Master Plan Amendment (MMPA), Community Vision for Takoma wanted to make sure you were aware of the overwhelmingly negative public reaction to the draft Amendment, as demonstrated by some [390 pages of resident input to the Planning Board](#) and the [petition signed by 232 residents](#).

In addition, we call your attention to a ***disturbing ethical issue*** at Planning. Planning staff ***twice*** promised that an equity analysis of the MMPA would be forthcoming from the County's Office of Legislative Oversight (OLO). The City voted to approve the MMPA (with conditions) based on this promise. But now, it turns out that there is no such analysis. Why did Planning, at two key moments in the process, say that there would be a formal equity analysis from OLO, when this was not true? *Ethically, the MMPA cannot go forward under these circumstances.*

Why is an equity analysis important?

In short, rather than ensuring a ***net gain*** in affordable housing, the proposed upzoning ***threatens*** the City's existing affordable housing. It risks causing rent increases, displacement, and gentrification. This would have a disparate and discriminatory effect on low-income people and people of color. It also remains unclear how a plan to increase our population by some 30%, in an area not within any transit center walkshed, aligns with climate goals.

What is the ethical issue at Planning?

On October 19th, in a recorded work session, Planning staff acknowledged the equity concerns of residents, and of the City Council. Their response (starting at time [stamp 5:40:00](#)) was that the County's Office of Legislative Oversight, the OLO, ***"will in fact review the Planning Board Draft"*** for equity impacts. So, in essence, Planning staff said, don't worry, that equity analysis is coming later.

Then, in December, Planning staff delivered [a document](#) to the City with their responses to each of the concerns in the City's [MMPA Resolution](#). On page 11 of that Planning document, in response to the equity concerns, it reads, quote "The Office of Legislative Oversight will conduct a formal impact assessment of the Planning Board Draft." That document from Planning, with that reassurance, is posted [with the December 6th City Council meeting agenda](#).

Only after the City and Planning Board votes, residents inquired and learned from the OLO Director that they are not conducting any such equity analysis. They never were, and they knew nothing about it.

So, the City and Planning Board voted on the draft MMPA based on a promise of a forthcoming equity study that does not exist. The County Council, City, and public **need to understand what**

happened here, and why, and how this Amendment can go forward given this corruption of the process.

(Note, we are aware that the RESJ Act does NOT require an OLO equity analysis for master plans or amendments, only for ZTAs and bills. The question is why Planning promised one anyway).

How would the Plan cause displacement?

1) There is broad support for rezoning the former Washington Adventist Hospital (WAH) site, to encourage new affordable and middle-income housing. This is not in dispute. Our aim is to preserve the affordable housing we have while seeing new development on the WAH site.

2) Why would we disrupt the City's most precious stock of affordable housing with proposed upzoning on Maple and Lee Avenues? This is a tremendously important corridor of affordable housing created through a complex collaboration of governmental and non-governmental organizations. It is apparently the densest neighborhood of affordable housing in the county. These highrises, medium-rises, and garden apartments were intentionally spaced so that those in affordable housing would benefit from views of sky and trees, and places to walk, rest, and play in nature, in order to strive for some degree of equity of quality of life with wealthier neighborhoods.

Today, Maple Ave is a thriving community of East African, West African, Latino, Black American, and other residents who benefit from a local school, community center, and Sligo Creek, with some of the lowest rents in the county. We object to the fact that Maple Avenue was appended onto the WAH site rezoning plan in the first place. The assertion that development on Maple will bring more "economic diversity" in this case can only mean that affordable housing will be lost and wealthier people would move in, spurring gentrification on Maple.

3) Residents urge reduction in the proposed upzoning in order to reduce economic pressure that would cause displacement. The upzoning on Maple and Lee, and on streets surrounding the campus, will increase land values and create pressure to tear down older buildings. Less than half the buildings are protected from this effect (to some degree) by covenants. The rest are vulnerable, rent-stabilized buildings. Because new buildings will not be subject to Takoma Park's rent stabilization for five years, they will be market rate and drive up neighborhood rents, threatening the naturally-occurring affordable housing. Any "right to return" is irrelevant to residents who would be displaced by teardowns and could not afford to come back at higher rents.

Takoma resident Carl Elefante, former American Institute of Architects (AIA) President, [states the plan](#) "threatens, rather than protects and enhances, the City's most substantial inventory of affordable housing" and would "sow the seeds for the demolition of the existing affordable housing."

4) **Why should this neighborhood have upzoned density equal to neighborhoods adjacent to metro stops elsewhere?** The inappropriate heights and density proposed for Maple, Lee, and streets around the campus are comparable to those planned for neighborhoods immediately adjacent to metro stops elsewhere in the county. This Maple Avenue corridor is ***not in the walkshed*** of any metro stop or planned Purple Line stop, and low-income workers, in particular, rely on their vehicles to haul ladders and construction material. And, the plan does not address the effect of intense (and more appropriate) development already occurring near the Takoma Metro, and predicted near the Purple Line.

5) **Public outreach was wholly inadequate.** Questions along the lines of “What would you like to see on the hospital site?” and “What do you like about your neighborhood?” did not begin to hint at the possibility of upzoning, teardowns, displacement and gentrification. Nor did the outreach effort explain that this “Minor” plan could increase the City population by some 30%. No answer was provided to the equity conundrum of why an already very dense neighborhood should shoulder more density. Requests from residents to see the actual report from the consultant hired to canvass Maple and Lee were ignored by Planning, as was the City Council resolution language requesting more outreach documentation. **We urge the Council to demand this missing material.**

6) **We understand the pressure to meet new housing targets under Thrive**, and that this plan was the first opportunity to prove how Planning would do so. However, the specific reality of the Maple Ave neighborhood, as an entirely affordable neighborhood, and the input of residents who want to preserve that affordability, has been ignored. Surely the intention of Thrive was not to disrupt the dense neighborhoods of affordable housing we already have. Note that the County has documented the loss of naturally-occurring affordable housing--*this Plan Amendment would accelerate that loss*. The **County Council must provide oversight** to ensure that the new Planning Board takes equity into account under Thrive--approving this draft of the MMPA after misinforming the public and City about a non-existent equity report would do the opposite.

7) In a key recorded Planning Board [work session on Nov 16th](#), the **Planning Board Chair acknowledged that this Plan Amendment cannot guarantee no net loss of affordable housing**. And the Vice Chair acknowledged that the Plan Amendment will, in fact, cause **displacement and gentrification**. To reduce this economic pressure, we must reduce the planned heights and density.

Please see these links:

· Architect and former AIA President Carl Elefante’s plan analysis: https://drive.google.com/file/d/1i4P_j6C7FP1177Y5lpWeTwGKKzQ4CWfc/view

- One page map with summary of Carl Elefante's plan analysis: https://drive.google.com/file/d/1VxnlwIQOb_BqhQ0U-Hbes0gjQ6zTSDuu/view
- Environmental scientist Paul Chrostowski's analysis of the effect on environment and on climate goals: <https://drive.google.com/file/d/1oKf-agKhqCd3lKWbo4GnEWi2x3tYcxWZ/view>
- Read the Planning Board's [compilation of 390 pages of overwhelmingly negative public comments](#). These comments, **were not adequately reflected** in the distillation of public input presented by staff to the Board. Be sure to read the input of Maple Avenue resident Denise Jones (p143), Karen Elrich (p138), Frances Phipps (p164), Laurie McGilvray (p197), Sue Miller (p328 representing CVT), David Reed (p349 representing the Community Equity Coalition), Professor Tom Hilde of the University of Maryland (p232) and Bob Dreher (p380). Also, the letter signed by 30 residents of Flower Avenue Park (p238).
- Our Q&A "What's Wrong with the Minor Master Plan?" <https://cvtakomajunction.com/2023/09/13/whats-wrong-with-the-minor-master-plan-q-a/>

We urge the County Council, under these circumstances, to state clearly that this Amendment should be sent back to Planning. We count on you to stop the potential displacement of residents and loss of affordable housing in our city. And we count on you to interrupt a process corrupted by misinformation on the non-existent equity analysis.

Thank you,

Sue Miller, Takoma Park MD
On behalf of Community Vision for Takoma
<https://cvtakomajunction.com/>

Community Vision for Takoma (CVT) is a grassroots organization with a mailing list of over 1000 residents in and around Takoma Park.