

**MONTGOMERY COUNTY PLANNING BOARD** THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

## MEMORANDUM

TO:	Montgomery County Council
FROM:	Casey Anderson, Montgomery County Planning Board Chair Gwen Wright, Montgomery County Planning Director
SUBJECT:	Response to OLO review of Thrive Montgomery 2050
DATE:	February 15, 2022

We have reviewed the Office of Legislative Oversight's assessment of the racial equity and social justice implications of Thrive Montgomery 2050 and provide this memorandum to respond to the major points raised by OLO and suggest opportunities to incorporate this feedback. Our overall reaction is that OLO raises some valuable points that can be included in Thrive but that OLO has overlooked important parts of the plan that address racial equity and social justice and in some cases recommends constructive ideas that are more appropriately addressed outside of the general plan and its update process.

1. OLO finds that the request to develop a RESJ impact statement for Thrive 2050 is premature. OLO acknowledges that the PHED draft "flags the policies and practices it deems as advancing the economy, racial equity and social justice, and the environment" but says "the methodology for assessing the economic, equity, and environmental impact of each policy and practice . . . is not explained." OLO recommends adding "data and metrics describing the racial and social inequities that Thrive seeks to impact . . . . OLO recommends that "the next iteration of Thrive make explicit the racial and social inequities the general plan seeks to narrow . . . . This includes providing data disaggregated by race and ethnicity to evaluate the economic impact of Thrive's compact and complete communities goals. Thrive should also include measures that monitor racial and social inequities in transportation, housing, parks and recreation to track its performance advancing RESJ."

We agree that it is premature to perform the kind of analysis contemplated by the RESJ review process established by the Council because Thrive does not – and is not intended to – specify the detailed methods of implementing the broad concepts and policies described in Thrive. The document describes the direction land use and public infrastructure policies should take and explains how this direction advances racial equity – as well as economic competitiveness and environmental sustainability – but acknowledges that further attention to the details of implementation will be needed.

For example, the housing chapter discusses the importance of facilitating development of new housing, including both market rate and subsidized or income restricted housing, while also taking care to avoid gentrification and displacement. The construction of new housing – and particularly support for a wider variety of types and sizes of housing – is critical to making housing more affordable and to improving the racial, ethnic, and socioeconomic integration of our neighborhoods and schools. As Councilmember

Montgomery County Council February 15, 2022 Page Two

Jawando noted during the PHED work sessions, the challenge for implementation is to accommodate additional development with safeguards to prevent displacement. Future plans, zoning text amendments, and other decisions about housing should be assessed for their RESJ impact based on how they meet these twin objectives, both of which are essential to advancing racial and social equity.

With regard to the methodology used to assess these and other impacts on racial and social equity, we do not agree that the PHED draft fails to explain how its recommendations should be evaluated. OLO seems to have overlooked the extensive list of metrics, included in each chapter, recommending specific ways to measure progress toward each major objective. For instance, in the Complete Communities chapter, some of the metrics are:

- Racial, ethnic and income diversity in centers of activity
- Percentage of employment growth
- Median housing expense per household

The PHED draft also usefully clarified that even the metrics not specifically tied to racial and social equity should incorporate data broken down by race, ethnicity, and other categories designed to illuminate whether progress is being made on an equitable basis (PHED p. 84).

Additional metrics focused on equity certainly could be added, but the PHED draft did address in detail how Thrive's success or failure in producing more equitable outcomes should be evaluated.

1. OLO recommends assembling a group of stakeholders representing communities of color and lowincome residents . . . to update Thrive to reflect their experiences, perspectives, and recommendations. Advancing RESJ requires sharing power with BIPOC and low-income communities to ensure their needs are being met." OLO goes on to say that the "scope of Thrive requires an inclusive policy development approach that is informed by lived experiences of people of color and low-income residents to ensure Thrive's recommendations do not displace current residents."

The Planning Department, the Planning Board, and the Council conducted extensive and intensive outreach over a period of more than three years with people representing the range of racial, ethnic, cultural and socioeconomic backgrounds that make up Montgomery County. As noted in the past, the Planning Board and Planning staff participated in over 200 community meetings – both virtual and in person. In addition, the Board held one extensive public hearing, the Council held two public hearings, one Town Hall, two listening sessions and met with every Regional Advisory Committee.

In fact, the Council has spent the past 3 to 4 months specifically conducting outreach to reach people of color. Councilmembers and Council staff can describe their activities in more detail, but Councilmember Will Jawando held meetings specifically with groups representing the BIPOC community.

As discussed more fully above, additional input from stakeholders as well as experts will be needed to harmonize the need for additional housing of different kinds with measures to avoid displacement, but these issues and their solutions cannot be fully elaborated in an exercise of this kind.

Montgomery County Council February 15, 2022 Page Three

As for displacement, the more-of-everything approach to housing recommended by Thrive is fully consistent with best practices in the field. For example, the Urban Institute states:

Boosting the housing supply by easing local land use, building, and zoning restrictions and encouraging alternative forms of housing like manufactured housing and accessory dwelling units would make homes more affordable and allow more buyers at all income levels to find homes, slowing the past of gentrification.

In addition, Thrive documents the damaging effects of disinvestment on low-income residents and communities of color, particularly in the East County. This part of Thrive is informed both by Christopher Leinburger's theory of the "favored quarter," which is discussed in the PHED draft, and by academic research documenting how disinvestment and the concentration of poverty is at least as common – and usually more prevalent – a source of neighborhood change as gentrification and displacement, including in Montgomery County. See, e.g., Will Stancil, "American Neighborhood Change in the 21<sup>st</sup> Century: Gentrification and Decline (University of Minnesota, 2020), available at: <u>https://law.umn.edu/institute-metropolitan-opportunity/gentrification</u>

2. OLO says the plan should "[d]escribe the historic and current drivers of racial inequities in land use, housing, transportation and other policy areas that Thrive seeks to address.

The PHED draft does in fact describe these drivers at several points, including an extended discussion in the introduction. Here are a few excerpts:

[P]ast patterns of discrimination – some intentional, some unintentional – have left many communities geographically, economically, and socially isolated. After the Civil War and the end of slavery, African Americans suffered from pervasive discrimination and exploitation in the provision of economic and educational opportunities, housing, health care, and basic public services. The resulting alienation led to the creation of self-reliant kinship communities in many parts of Montgomery County in the late 19<sup>th</sup> century. Over time, these communities suffered from lack of public investment in infrastructure such as new roads, sewer and water, schools, health clinics, and other public amenities and services. Some communities were hurt by the urban renewal policies of the 1960s. Others faced pressure to sell their houses or farms to developers for new subdivisions.

Planning decisions and real estate development practices aggravated these injustices for most of the 20<sup>th</sup> century. Redlining and restrictive racial covenants created geographic and economic divisions that have left a legacy of injustice, that not only separated people by neighborhood or community, but also barred Black Americans from building wealth (the type of wealth used to invest in higher education, start businesses, and pass to heirs). The effects of these efforts to separate people by race and class continue to be felt today. More recently, disinvestment from and abandonment of neighborhoods previously considered highly desirable, combined with the suburbanization of poverty, have created new geographic divisions and barriers to equity and inclusion. The Wedges and Corridor plan's focus on the I-270 corridor and related planning decisions exacerbated this problem by discouraging growth in the East County, focusing public and private investment to the west.

Today communities with high concentrations of racial and ethnic minorities also show lagging median household incomes, not because of their race or ethnicity but because [of] financial precarity due to low wage jobs, high rates of being uninsured, declining business starts and lack of housing are experienced to a greater degree as a result of past and institutionalized practices. Not surprising is the resulting gaps in quality-of-life indicators [can be] seen among Black, Hispanic, and Asian residents.

This separation of neighborhoods along lines defined by race and income has important consequences for access to educational opportunities and the life prospects of our county's children. In 2019, three-quarters of Black, Hispanic, and English-learning students in Montgomery County Public Schools – along with more than 80 percent of all low-income students in the system – were enrolled in high-poverty-focus schools. By comparison, more than two-thirds of all white, Asian, and multi-racial students were enrolled in low poverty schools.

As we seek a future that is more equitable and inclusive, improved access to infrastructure and amenities in racially, socially, and economically isolated areas will not be enough. We also must facilitate the integration of neighborhoods by race and income, across all ages. Increasing the share of racially and economically mixed neighborhoods and schools across all parts of the county is critical to ensure that the inequities of the past will not be perpetuated in the future.

Advancing racial equity through just planning policies and public investments in underserved communities, promoting the racial and economic integration of neighborhoods, and focusing on the potential for the design of communities to help build social trust and inclusion while encouraging civic participation are among the most significant elements of Thrive Montgomery 2050. Thrive Montgomery 2050 strives to create racially integrated and just communities. Like economic competitiveness and environmental sustainability, policies designed to advance racial and social equity are integrated into every part of this Plan.

Each chapter includes additional discussion of the background behind planning decisions that produced harmful consequences, both intended and unintended. While more discussion could be added, Thrive presents this summary of these historic and current racial inequities to lay out the framework for the policies it advocates to address them. The history works hand in hand with the metrics presented thoughout the document to highlight the injustices the plan seeks to address.

3. OLO suggests that Thrive may aggravate economic inequality and contends that equity should be a more central focus for economic development. OLO says Thrive "focuses on attracting new businesses and workers to the County who can afford to reside and/or work in mixed-use, transit-oriented town centers" and says "this economic development approach could widen racial and social inequities as it primarily offers benefits to affluent and disproportionately White people."

Thrive's recommendations on housing and "complete communities" address the very problem OLO has identified: too many people are priced out of mixed-use, transit-oriented communities, and this disproportionately affects middle and lower-income residents, who are disproportionately people of color. Increasing the supply of housing in areas that are already walkable, served by transit, and near existing jobs will make these neighborhoods more economically and racially diverse. By extending high-

Montgomery County Council February 15, 2022 Page Five

quality transit to all of the county's densely populated areas as recommended by Thrive, residents who cannot afford to move to existing transit-oriented neighborhoods will have access to a wider range and larger number of jobs and educational opportunities, whether or not they can afford a car. Moreover, Thrive's emphasis on Vision Zero and improving infrastructure for walking and biking is especially beneficial to people of color, who are disproportionately affected by unsafe roadways.

Of course, the only way to address the scarcity of housing and transit so that the benefits of transitoriented mixed-use development can be equitably shared is to build more of both. In fact, the reason vibrant mixed-use centers of activity served by high-quality transit are associated with gentrification is that the supply of these kinds of neighborhoods and districts is not sufficient to accommodate everyone who wants them. Rejecting transit-oriented development on the grounds that it primarily benefits affluent white residents ensures that this type of living environment remains available only to the privileged, while lower-income people of color are relegated to neighborhoods inaccessible to transit and far from employment opportunities. See, e.g., Raj Chetty, et al., "Where is the Land of Opportunity? The Geography of Intergenerational Mobility in the United States," Quarterly Journal of Economics (June 2014), available at <a href="https://opportunityinsights.org/paper/land-of-opportunity/">https://opportunityinsights.org/paper/land-of-opportunity/</a>

OLO also identifies a number of economic development strategies that are likely to advance equity goals, such as helping to build "green sector" industries, targeting workforce development, and improving opportunities for BIPOC entrepreneurs. These are all constructive suggestions, but they relate to programs and tools that are generally not directly tied to land use. For that reason, we believe these ideas are more appropriately addressed in the county's economic development strategy, for which Thrive is a complement, not a substitute.

In conclusion, Thrive is a general plan, which is intended to set the direction for future plans and policies but not provide explicit details about all implementation tools. These tools are the next step in the process and are very appropriate for OLO assessment and for many of the engagement suggestions that have been made. Thrive builds on the best practices and the most current thinking on racial and socioeconomic equity in housing, transportation and economic development. The document is infused with equity recommendations in every chapter – from refocusing investment on the eastern side of the County; to providing safe modes of travel for people who may not use cars, but rely on transit, walking and biking; to addressing housing inequities and promoting additional opportunities for all residents to have appropriate housing choice. Thrive talks about equity both explicitly and implicitly and lays out a plan for moving forward to a more equitable future for the county. But to move to the next steps and begin to implement tools that will bring greater equity, we must move forward with Thrive.