



**Oakland Mills Community Association**  
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Council Members, the testimony attached is being submitted in support of CR97-2019 on behalf of the Oakland Mills Board of Directors and its Education Committee and Housing Committee chaired respectively by Jonathan Edelson and William R. McCormack Jr. Thank you in advance for your consideration.

### **Education Committee**

OMCA supports the proposed Robinson Overlook mixed income development and urges you to support this, including granting an APFO waiver, if necessary. Howard County has both a housing and schools problem. There is much inequity in the availability of affordable housing throughout the county, and there is a large achievement gap among children from less economically advantaged backgrounds. It's time to open the county to families from different backgrounds, and it's time to end the stark differences among school populations in schools that are just miles apart, in some cases.

Robinson Overlook presents an opportunity to give Howard County families the chance to live in a part of the county where there is currently nothing available to them. It also presents an opportunity to begin balancing school demographics. All of the schools this development would currently attend have far fewer students from lower income backgrounds than the county average of over 20 percent. These schools currently have rates of children receiving free and reduced meals that come in at half or even a quarter of the county average. Contrast that with schools serving existing Housing Commission properties where rates are as high as 67 percent. We can address this and provide more opportunity in Howard County. Desegregated schools lift everyone.

School overcrowding is certainly a concern in Howard County - until someone is told they may have to leave their preferred school due to overcrowding. Then attention turns to moving someone else out of a school or preventing someone else from attending. Robinson Overlook is not an example of a developer getting rich at the expense of our children. In fact, it's quite the opposite. It's an example of opening more of Howard County to more children. For this reason alone, APFO should be waived for such a development.

Affordable housing advocates raised concerns that APFO could be used to block affordable housing. Some accused these advocates of being influenced by wealthy developers. Allowing APFO to stop this development would confirm just what the affordable housing advocates feared. Furthermore, the school system is embarking on another attempt at comprehensive attendance area boundary adjustments. Only one school that would serve Robinson Overlook is considered closed right now. Other nearby schools are not closed. This is an opportunity for both the County Council and our Board of Education to come down

on the right side of history. Waive APFO, allow the development to continue, and work with the Board of Education to ensure the boundary adjustments accommodate the few more children who would be introduced to the schools.

A comprehensive housing plan for the county would be an even greater step toward a more open Howard County. With such a plan, there would be no need for individual hearings on each affordable housing development. Such a plan could also remove roadblocks to affordable housing such as APFO or claims of lacking public transportation. The Housing Commission, transportation officials, and school officials could refer to this plan and make their own plans accordingly, or better yet, they could work together to ensure the plan can be executed successfully. Such a plan would also provide a much better perspective on the imbalances in housing availability throughout the county. Many mistakes have been made over the years, and these mistakes are clearly reflected in cold hard data if you look at the distribution of affordable housing in the county, the different demographics of neighborhoods, and school populations that look nothing like the county averages or the reality of our society.

## **Housing Committee**

Oakland Mills Community Association supports the waiver of APFO restrictions to approve the Robinson Overlook project by the Howard County Housing Commission.

- Almost all Howard County Housing Commission complexes are located east of Route 29. Robinson Overlook is west of Rt. 29. This is literally a step in the right direction.
- This area of the county has little or no affordable housing.
- As of January, 2019, the local elementary school which would serve Robinson Overlook had 5.2% FARM students, the middle school had  $\leq 5.0\%$  and the high school had 15.7%. These are well below the county average of 22.5%.
- There is a good tenant income spread in the 43 affordable units from 30% to 60% of Area Median Income with the majority of the units at 60%. Five units at market rate.
- The architecture for Robinson Overlook continues the Housing Commission trend of creating projects that blend in with surrounding communities.
- Where there are roads, there can be buses. Robinson Overlook doesn't have to locate on an existing bus line. A bus line can adjust its route to add the complex.

The issues facing Robinson Overlook underscore the need for the creation of the Comprehensive Housing Master Plan recently approved by the current administration.

The Oakland Mills Village Center Community Plan filed with the county in 2015 calls for a Comprehensive Housing Plan. "...it is crucial for the county to implement a Comprehensive Housing Plan to provide ample opportunities for tenants at all income levels throughout the county." OMCA is for an equitable distribution of affordable housing throughout all of Howard County.

The Comprehensive Housing Master Plan needs to address several issues.

- The starting point must be the creation of a base line map and data base of Howard County of all affordable housing from all providers.
- Placement of affordable housing must take into account socio-economic factors. Key is the percent of Free and Reduced Meal (FARM) students in each elementary, middle and high school. The FARM rate has a strong inverse correlation with school test scores. Prospective home buyers/renters will move into the best school test score district they can afford.
- The master plan must provide for a central point of control for the equitable distribution of affordable housing throughout the county. Without proper controls, the plan will not meet its goals. The current massive imbalance of affordable housing was caused by no plan and no control.
- A long term goal of the plan must be that all schools will have a FARM percentage in the range of two-thirds to one and a half times the county-wide average for each level of school.
- A moratorium must be placed on all affordable housing from any provider in elementary, middle and high school districts where FARM percentages are in excess of one and a half times the county-wide FARM average for the level of school. To accomplish this a new ordinance is needed. Just as APFO guides development based on measurable factors, so must a new FARM Adequate Public School Space Ordinance (APSSO) guide placement of affordable housing. For areas of low FARM rates APSSO overrides APFO.
- The plan must include a de-concentration plan for those areas of the county that have a concentration of low and moderate income housing. The 2011 Analysis of Impediments to Fair Housing Choice study sites these concentrations, mainly the five older villages in Columbia and north Laurel, and faults the county for the lack of a de-concentration plan. To our knowledge no de-concentration plan was ever created. It is our understanding that a new analysis will be done in 2019.
- The plan must include changes in the Fee in Lieu and Alternative Compliance regulations. Money paid into fee in lieu must be used in the same local area. There can no longer be a migration of affordable housing from one part of the county to another part of the county through fee in lieu and alternative compliance.
- The plan must create zoning recommendations to provide for better intermingled placement of single family detached, town home and multi-family housing in the same school district, and prevent concentrations of multi-family dwellings in close proximity.

With Robinson Overlook and the implementation of a Comprehensive Housing Master Plan Howard County will take a leadership position in providing opportunity for everyone.

## **Closing Statement**

For years, we have heard County officials state that the inequities and imbalances among the school populations were a school system problem, while the school system indicated it is a housing problem. Robinson Overlook is a step in the right direction. Here's an opportunity for both sides to do the right

thing; please take it. Please be the Council that comes down on the right side of history and opens more of Howard County to all.