



## Howard County Citizens Association

Since 1961...

The Voice Of The People of Howard County

### TESTIMONY: CB 24-2012: Downtown Columbia Partnership

Presented to  
The Howard County Council  
June 18, 2012

#### POSITION: SUPPORT WITH AMENDMENTS

Re: Affordable Housing

1. There does not appear to be a requirement that developers who provide affordable housing in place of payments to the housing fund must provide such affordable housing in the downtown district. Hypothetically, every developer could choose to provide housing anywhere in Howard County, instead of contributing to the fund. While this bill seems fairly clear about using the housing **fund** in downtown Columbia, it is not clear that that is the case for the construction of housing in lieu of financial contributions to the fund.

HCCA proposes the following change to Section 28.115: Payments Required By CEPPAs (F) Affordable Housing Residential Units (page 13)

*(3) A DEVELOPER OF RESIDENTIAL PROPERTY IN THE DISTRICT WHO PROVIDES AFFORDABLE HOUSING UNITS **IN THE DOWNTOWN DISTRICT** AS AN ALTERNATIVE SATISFACTION OF THE AFFORDABLE HOUSING REQUIREMENT AS PROVIDED IN THE ZONING REGULATIONS, IS NOT REQUIRED TO MAKE THE PAYMENTS PROVIDED IN SUBSECTION (F)(1) ABOVE.*

2. Although the Downtown Columbia Partnership (DCP) is a non-profit entity, the inclusion of county officials on its board of directors and the administration of its housing fund by the county's Housing Commission effectively makes the Downtown Columbia Community Housing Foundation (DCCHF) a quasi-governmental entity. As such, there is the risk that use of DCCHF funds might be unduly influenced by the vagaries and vicissitudes of politics or the economy. E.g., in a financial pinch, county officials may be tempted to raid the fund for other than its intended purpose. HCCA believes that "(t)he intent of this full spectrum housing program . . . to satisfy all affordable housing requirements for downtown . . ." is best carried out by creating an entity independent of county government, thus limiting possibilities of a conflict of interest situation that would force a choice between using the Foundation funds for their intended purpose or diverting them to some other purpose

*(The above quotation is from the 2000 General Plan amendment creating the Downtown Columbia Plan, p.18)*



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3. A final area of concern regarding affordable housing is the lack of an adequate definition of “affordable” and the omission of any language referring to full spectrum housing. The Downtown Columbia Plan, (*Chapter 1: Making a Special Place, section 1.5, page 17*) states: “It is with these policy statements (statements from the GP 2000, Policy 4.2) in mind that this Plan proposes (the Downtown Columbia Community Housing Foundation) . . . to create an effective, flexible means of providing a **full spectrum** of housing for downtown Columbia.” On page 16, it quotes from its predecessor document, Downtown Columbia: A Community Vision (*section 1.5, page 16*):

“Provide a full spectrum and diverse mix of housing, ensuring that low-, moderate- and middle-income families have an opportunity to live in downtown, thus continuing the original vision of Columbia as an inclusive community.”

An inclusive community is what makes Columbia special, and inclusion means people of all races, colors, beliefs, religions, ages, nationalities, occupations and income levels having “ . . . an opportunity to live in downtown.”

An affordable housing unit as defined in CB 24 is “ . . . *A DWELLING UNIT THAT IS MADE AVAILABLE FOR SALE OR RENT BELOW MARKET RATE TO HOUSEHOLDS OF ELIGIBLE INCOME.*” (*PAGE 14, LINES 29 - 31*). We consider that vague, to say the least. Does eligible income mean income between 60 to 80 percent of county median household income? The fact that the Housing Commission has been proposed to manage the Housing Fund indicates that “affordable” means moderate. We want language that ensures that there will be available residential units affordable to people whose income is below that required for moderate income housing.