



OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE


Marc Elrich
County Executive

Tiffany Ward
Director and Chief Equity Officer

MEMORANDUM

November 28, 2022

To: Jennifer Bryant, Director
Office of Management and Budget

From: Tiffany Ward, Director
Office of Racial Equity and Social Justice 

Re: Racial Equity Impact Assessment (REIA) for Special Appropriation (SA) #23-52 Maryland-National Capital Park and Planning Commission (M-NCPPC) Bethesda Lots 10 – 24 Parks (P872302) and Special Appropriation #23-55 Montgomery County Government Department of Transportation (MCDOT) Farm Women's Market Garage Project (No. 502316)

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that Special Appropriation #23-52 *Maryland-National Capital Park and Planning Commission (M-NCPPC) Bethesda Lots 10 – 24 Parks (P872302)* and Special Appropriation #23-55 *Montgomery County Government Department of Transportation (MCDOT) Farm Women's Market Garage Project (No. 502316)*, are not likely to advance equitable outcomes for low-income Black, Indigenous, People of Color (BIPOC) in the County as there is no evidence to suggest that these projects will serve people and communities with the greatest demonstrated need. In turn, supplemental information accompanying these requests suggests that these projects will primarily serve a well-resourced area of the County that is largely comprised of affluent white County residents. As such, ORESJ recommends that M-NCPPC and MCDOT refer to the recent [*Thrive Montgomery 2050 Racial Equity and Social Justice Review*](#) report from Nspiregreen/Public Engagement Associates as a tool to help ensure that the needs of historically disadvantaged and vulnerable social groups in the County are more accurately and carefully represented in projects such as P872302 and No. 502316.
- II. **BACKGROUND:** The purpose of Special Appropriation #23-52 P872302 and Special Appropriation #23-55 No. 502316 is to provide for two new parks, increase housing near transit, and preserve and enhance the historic Farm Women's Market in downtown Bethesda. Specifically, funding will be used to begin preliminary design, planning, site

improvements, and utility work for both the two public parks portions of the redevelopment project in addition to the new underground parking garage on Lot 24 in the Bethesda Parking Lot District (PLD). These projects will be coordinated through public-private partnerships between M-NCPPC, MCDOT, the Town of Chevy Chase, and a private developer consistent with the Bethesda Downtown Plan (BDP) on a portion of Lot 24 and all of Lot 10.

The 2017 BDP¹ recommends the creation of the Eastern Greenway—linear public parks on the edge of Downtown Bethesda. The BDP specifically recommends that PLD surface lots should be converted into public parks as much as feasible to create the Eastern Greenway while preserving public parking in underground garages. Citing underutilization, redevelopment of the Farm Women's Market and the area adjacent (including Lot 24 and Lot 10) would reposition both the market and the surrounding areas as a prime destination for visitors—providing needed housing and green space to be used by the community while also providing adequate parking spaces for visitors and residents through the underground parking garage.

- III. **ANALYSIS:** Supplemental information accompanying these special appropriations requests asserts that while projects P872302 and No. 502316 are located in an area that is comprised of 77.79% white residents, all County residents stand to benefit from the creation of these projects. This assertion is based on the fact that the project will serve some low-income multi-family properties within a quarter of a mile of the project sites as well as provide access to all those living outside of the area by way of the site's accessibility to public transportation. It is the view of ORESJ however, that while these projects do stand to serve a very limited number of low-income BIPOC residents of the County, these efforts are not enough to advance equitable outcomes for these groups.

ORESJ has previously written several Racial Equity Impact Assessments (REIAs) on multiple supplemental appropriations requests related to the racial inequities and disparities that characterize many of the County's housing affordability and stability challenges. The REIAs listed below provide descriptions of the systemic nature of housing inequities, their root causes, and the burdens bore by BIPOC communities and very low-income people:

- REIA of Supplemental Appropriation #21-527 Department of Health and Human Services Rental Assistance Program:
<https://www.montgomerycountymd.gov/ore/Resources/Files/21-527.pdf>
- REIA of Special Appropriation #22-10 Assistance in Community Integration Services:
<https://www.montgomerycountymd.gov/ore/Resources/Files/22-10.pdf>

¹ Montgomery County Planning Department. *Bethesda Downtown Plan*. 2022. Available at:
<https://montgomeryplanning.org/planning/communities/downcounty/bethesda-downtown-plan/>

- REIA of Supplemental Appropriation #22-31 Nebel Street Shelter:
<https://www.montgomerycountymd.gov/ore/Resources/Files/22-31.pdf>

Additionally, as detailed in the [REIA for Supplemental Appropriation #22-74 Preserving Naturally Occurring Affordable Housing](#), it is worth noting that the distribution of low-income households and those most impacted by racial disparities in housing cost burden live along the County's major transit routes—with low-income cost-burdened households being concentrated along the I-270 corridor and on the Southeastern part of the County that intersects with I-495, which includes Bethesda and Chevy Chase². As such, ORESJ recommends that in the development of new housing on these sites, accessibility and affordability be prioritized to mitigate housing disparities amongst BIPOC and low-income residents of the County.

The public-private partnership between M-NCPPC, MCDOT, the Town of Chevy Chase, and the private developer is uniquely positioned to advance equitable outcomes for County residents in greatest need of safe and stable housing. Additionally, these projects also can mitigate inequities in health, economic security, educational attainment, and other indicators of well-being as housing security impacts all of these factors. This can only be accomplished if efforts to advance racial equity and social justice are prioritized during the preliminary stages of project development. As previously mentioned, ORESJ advises referencing Nspiregreen/Public Engagement Associates' racial equity and social justice review of the Thrive 2050 plan to glean insights regarding best practices related to the planning and development of the County's lands. Specifically, ORESJ recommends close attention be paid regarding:

- **Transparency** and meaningful **community engagement** that occurs from the onset of project design through development/construction, implementation, and regular follow-ups after the projects.
- **Addressing root causes** of systemic inequities and acknowledging that in some instances, forms of restitution will be required to fix them.
- **Vigilance** in seeking **accountability** for those (people, policies, and systems) actively working against advancing equitable outcomes for County residents through deliberate action and systems of checks and balances.

cc: Chris Conklin, Director, Department of Transportation
Ken Hartman, Director, Strategic Partnerships, Office of the County Executive

² HR&A Advisors, Inc. and LSA. *Montgomery County Housing Needs Assessment*. 2020. Available at: <https://montgomeryplanning.org/wp-content/uploads/2020/07/MoCo-HNA-July-2020.pdf>