

September 14, 2021

The Hon. Calvin S. Hawkins, II  
Prince George's County District Council Chair

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Chairman of the Prince George's County Planning Board  
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RE: Countywide Sectional Map Amendment (CMA) -- Support with recommendation to address risk of displacement in multifamily residential zones in Transit Centers

### **Summary statement**

1. We urge the County Council to finalize and adopt the CMA without delay. This action implements the 2018 zoning regulations which are critical to supporting the County's transit-oriented economic development strategy and building a more sustainable and connected future. We have long been strong advocates for transit-oriented development as the most competitive and effective strategy for the county. Implementing the zoning rewrite through the CMA is a once in a generation change to bring the County's land use policies into the modern era.
2. However, we also recommend that for multifamily residential zones occurring in Transit Centers that do not have an overlay, their zone conversion to the new zone district should be closest to the current zone district, rather than a much higher density Local Transit Oriented (LTO) zone.
  - a. For example: R-18 (20 du/ac) would become RMF-20 (20 du/ac), rather than LTO (40-80 du/ac). In the future, with affordable housing preservation measures in place, candidate properties can be upzoned to LTO.
  - b. Alternatively, the Takoma/Langley Crossroads (TLC) Transit Center could be rezoned to Neighborhood Activity Center (NAC - 30 du/ac), rather than the much higher density LTO.
3. Separately, we ask the County Council to not deviate from implementing the CMA in accordance with the County and state law which disallows the County from intensifying a property's zone classification above what is currently designated in the rezoning decision matrix unless there is a mistake.

## Full statement

Please accept these comments on behalf of the Coalition for Smarter Growth, the leading non-profit organization in the D.C. region advocating for walkable, bikeable, inclusive, transit-oriented communities as the most sustainable and equitable way for the DC region to grow and provide opportunities for all.

### **1. The CMA is critically important to the County's transit-oriented economic development strategy.**

First, we wish to express our overall support for the Countywide Sectional Map Amendment (CMA). The CMA is a last step to implementing the 2018 modernized zoning regulations. Started in 2014, this action puts in place long overdue updated and transparent zoning rules to encourage mixed use, transit-oriented and walkable communities and downtowns, which is a core part of the County's economic development strategy. The new mixed-use zones adopted in the 2018 zoning rewrite, along with the overall modernization of the County's zoning regulations, advances the County's goals of building sustainable, inclusive, economic development and walkable, transit-accessible communities. The CMA will put in place the new zoning regulations to implement the [Plan Prince George's 2035](#)-designated Transit Centers where most of the County's growth is to be focused.

Over the course of a number of years, we worked with stakeholders and community activists to engage in the public process to update the County's outmoded zoning and subdivision regulations. The zoning rewrite and CMA are worth the effort because they replace the County's current obsolete and cumbersome zoning regulations which are holding back the County. This is a crucial, once in a generation change to the County's land use policies. Here are some of the ways the zoning and subdivision process will improve:

- *Design and building form standards:* the zoning rewrite establishes transit-oriented mixed-use zones at neighborhood, local and regional scales to support the goals of walkable urbanism, creating walkable, and bikeable areas that are well-connected to transit.
- *Parking standards for urban and transit-oriented areas:* the zoning rewrite reduces excessive minimum parking requirements in transit-oriented centers in order to encourage non-auto travel and reduce housing costs.
- *Street design:* the revisions require interconnected streets, shorter blocks, and pedestrian and bicycle infrastructure. It implements newly adopted urban street design standards that support walk- and bike-friendly streets.
- *Transportation demand management:* the regulations also establish progressive traffic reduction measures that emphasize encouraging more people to ride transit if available, bicycle, share rides and walk.

- *Ease of use:* The zoning and subdivision regulations are presented in a more readable format providing tables and graphic illustrations to better understand and visualize the standards.
- *Ending perpetual approvals:* The zoning rules establish limits on approvals after a number of years. Today, approvals are allowed to live on forever, despite significant changes that may occur after initially projected conditions. While some of the provisions seem overly generous, setting the proposed limits would be a big step forward for the county.

**2. Multifamily residential zones, which are not subject to an overlay, but occur inside a Transit Center, should receive their corresponding new zone rather than a much higher density LTO zone, until affordable housing preservation measures are taken.**

2a. We recommend that in Transit Centers with no overlays, the multifamily zones R-18 (20 du/ac) would become RMF-20 (20 du/ac) and R-30 (10 du/ac) become RMF-12, rather than LTO (40-80 du/ac). In the future, with affordable housing preservation measures in place, candidate properties can be upzoned to LTO.

In two specific cases, multifamily residential zoned properties occurring in a Transit Center are proposed to be placed in a much higher density zone. The R-18 zone (20 du/ac) zone covers a large part of Takoma/Langley Crossroads (TLC), and parts of the Landover Metro station Transit Center. Another multifamily, R-30 (10 du/ac), is also located in the TLC Transit Center. All these R-18 and R-30 properties are proposed by the CMA to receive a much higher density zone of Local Transit Oriented (LTO) zone (core or edge) of 40-80 du/ac.

While there are other Transit Centers with R-18 zones, they also have overlay zones which generally allow for greater flexibility and more intensive development. However, in the case of the TLC and Landover Transit Centers, no overlays exist. Given these unique circumstances for the multifamily zones of R-18 and R-30 for TLC and R-18 for Landover, we recommend converting these multifamily zones to their corresponding new zone rather than a significant increase in residential density with LTO at this time. Specifically the new zones should be RMF-20 or RMF-12.

These are the appropriate zoning designations until further analysis can be done to address concerns specific to multifamily residential properties -- specifically the risk that a significant increase in density will cause rapid displacement of residents of aging rental apartments. In fact, the [TLC Sector Plan](#) called for implementation of an affordable housing strategy prior to a rezoning. Thus at this time, for the purposes of implementing the CMA, the conversion of R-18 to RMF-20 and R-30 to RMF-12 would be most consistent with the adopted TLC Sector Plan.

Converting multifamily zones to the corresponding new zone is consistent with how single family zones are being treated in the Transit-Oriented/Activity Center Base Zones Decision Matrix for properties located in designated Plan 2035 Centers. Even though the goal for Local Transit Centers' new housing mix is "Mid-rise and low-rise apartments and condos, and

townhouses,” single family zones are being retained rather than be brought into consistency with their 2035 Transit Center designation which would require conversion to LTO.

In the future, the use of some of the properties might change to better match their center designation. It is possible that some individual owners might choose to work together to consolidate their properties to redevelop them, working with the County to create smooth transitions with surrounding land uses. A tailored Planned Development process would be the likely approach for some of these single family zoned properties to be candidates for rezoning to LTO. Similarly, the situation for aging garden apartments would not be permanent, but the County would have the time to develop strategies to address potential displacement of existing renters and inclusion of new affordable and market rate homes.

The CMA offers another precedent for converting R-18 to RMF-20 inside a Transit Center -- this is proposed for a part of the Suitland Transit Center, even though the property is also subject to an overlay. This R-18 site is similar to the TLC R-18 sites with aging multifamily buildings.

In sum: for R-18 and R-30 properties that are not covered by an overlay zone, but occur within Transit Center boundaries, we recommend converting them to RMF-20 or RMF-12 instead of LTO at this time.

2b. Alternatively, the [Neighborhood Activity Center \(NAC\)](#) zone instead of [Local Transit Oriented \(LTO\)](#) zones would be a more appropriate option for the Takoma/Langley Crossroads (TLC) Local Transit Center.

As another alternative, we recommend the CMA apply the [Neighborhood Activity Center \(NAC\)](#) zone instead of [Local Transit Oriented \(LTO\)](#) zones to the Takoma/Langley Crossroads Local Transit Center. The NAC zone is a more appropriate zone given that TLC is the only Local Transit Center without a high capacity Metrorail station. While the Purple Line stations will provide increased transit service, it does not equal the high level of service and capacity provided by Metrorail. Thus, a lower intensity mixed use zone, the NAC, is more appropriate for this transit center.

#### **4. We ask the County Council to not deviate from local and state law which disallows the intensification of a property’s zone classification.**

Last, we wish to express our agreement with the sentiment that the Planning Board and County Council must adhere to the law adopted at the County and state levels to not grant intensification of the zone classification of a property through the CMA. We recognize that this is being requested by some property owners. We reiterate the County Council’s resolutions that clarify that: “The CMA is not intended to be a venue for rezoning property except to the extent necessary to implement the new Zoning Ordinance.” (Hearing notice, 7/29/2021). And: “This CMA is a non-substantive, technical zoning reclassification of land.... It will support the desired development pattern of the Plan Prince George’s 2035 Approved General Plan (Plan 2035),” (CR-027-2019).

## Conclusion

We support the CMA as a technical zoning reclassification to implement the new Zoning Ordinance and 2035 Approved General Plan, while recommending for the reasons stated above that the RMF-20 zone be applied to R-18 properties and the RMF-12 for R-30 properties that occur within Local Transit Centers, but do not have overlays. These conditions are found only in the Takoma-Langley Crossroads and Landover Transit Centers. Alternatively, the TLC Transit Center could be rezoned to the Neighborhood Activity Center zone.

The CMA is a critically important step for the future of the County. We urge you to not delay, but refine (with our recommended changes) and implement the CMA by the end of this year.

Thank you for your consideration.

Sincerely,



Cheryl Cort  
Policy Director