

Master Plan

Housing Element



Housing Element of the Master Plan

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2018 Comprehensive Plan Update

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1. Introduction



A “Home” is more than just a place of shelter; it is the cornerstone of stability for an individual or family and influences one’s social, emotional, and physical health, and economic life. Quality housing, be it rental or for-sale, affords one a secure place to live in peace with dignity. Increasingly, the “home” has become a place for work and school, if not on a full time basis, at least on a temporary one. Collectively, homes form the neighborhoods and communities that are significant parts, and land uses of, the City of Gaithersburg. Any

discussion about housing is more than sales or rent costs and unit types. Housing means a discussion of people, opportunity, and creating a community and a city that is a desirable place to live.

Housing further contributes a necessary component in creating a productive City. It is an economic driver and a foundational element in achieving the City’s socio-economic goals. Housing occupies the largest proportion of land in the City of Gaithersburg, approximately 39%. In fiscal year 2023 (FY23), real and personal property tax were the largest sources of revenue for the City, contributing approximately 46% of projected General Fund revenues. Further, residential uses make up approximately 66.5% of the property tax base. The second largest revenue source in FY23 was income tax from residents, making up approximately 21.5% of General Fund revenues. Housing not only promotes personal wealth, family stability and health, social interaction, and community resilience, but is integral to the City’s ability to fund parks, cultural and recreational programs, public infrastructure such as roads and street trees, public safety, and social services.

The State of Maryland passed House Bill (HB) 1045 in 2019 requiring the inclusion of a Housing Element in all comprehensive (master) plans. This Element builds upon the State’s 12 Planning Visions, one of which is “...a range of housing densities, types, and sizes [that] provides residential options for citizens of all ages and incomes.” At a minimum, the Housing Element is to address low income and workforce housing. In 2021, HB 90 was passed which

requires all Housing Elements to “affirmatively further fair housing” in addition to affordable housing. The following City of Gaithersburg Housing Element will not only address the State requirements, but, with the last formal City Housing Policy being adopted in 1999, is an opportunity to address and establish the City’s housing policies and overall goals for the City of today and moving forward. The goals and recommendations that follow were informed through a combination of data analyses, public engagement, sound planning principles, City policies, and research.

The Housing Element includes:

- A glossary of terms used throughout the Element;
- A background section that includes a history of the City’s housing-related efforts and socio-demographic data and growth projections analysis to establish the context for the subsequent goals and recommendations;
- A “Planning & Zoning” section that addresses City zoning and planning efforts that promote and support the City’s overall housing inventory and needs;

- A “City Programs and Policy” section that discusses the City’s affordable housing programs, explores ways to preserve existing affordable housing and help people retain or access housing, and considers incentives to help create more affordable housing;
- An “Equity & Social Justice” section that addresses racial and socioeconomic equity issues and institutional/structural barriers; and
- An implementation matrix that shows realistic timeframes for the Element’s various recommendations.

While this Housing Element will include aspirational objectives, it acknowledges the realities of housing markets and their challenges. The Housing Element cannot resolve all socio-economic issues or change financial market realities, but it should be viewed and used as a foundational tool to assist the City and its non-profit, residential, business, and development communities to move forward collectively in addressing all housing challenges. To these points, the City of Gaithersburg Housing Element is guided by the following overall vision:

The City of Gaithersburg strives to ensure all current and future residents from all socioeconomic populations have access to a diverse range of quality homeownership and rental housing choices that are affordable, equitable and livable.

2. Glossary

For the purposes of this Master Plan Amendment, the following definitions apply.

Accessible Design (see also **Universal Design**) – A design process in which the needs of people with disabilities are specifically considered.

Accessory Dwelling Unit (ADU) – A smaller, independent residential dwelling unit located on the same lot as a single-family home. ADUs may be internal to the existing home (i.e. a basement apartment), may be located within a separate structure (such as a garage), or may be a separate stand-alone building. Trailers, mobile homes, recreational vehicles (RVs), and temporary structures (such as tents) are not ADUs. All ADUs must comply with building code regulations.

Affordable housing – A general term for lower-priced housing, including both market-rate affordable and regulated affordable housing.

Affordable housing, Market Rate – Housing that is naturally lower-priced due to its age, location, and/or physical characteristics.

Affordable housing, Regulated – Housing where rents, sale prices, and incomes that are restricted. They are also regulated under the requirements and definitions established in Article XVI of Chapter 24 (Zoning) of the City Code.

Affordable Housing Ordinance (AHO) – Article XVI of Chapter 24 (Zoning) of the City Code.

American Community Survey (ACS) – An annual sample survey of residential addresses in the United States, conducted by the Census Bureau and reported as either annual data (1-year ACS) or multi-year data (5-year ACS). The ACS collects a robust amount of demographic, economic, housing, and social information. Additional detail about the ACS can be found at <https://www.census.gov/programs-surveys/acs>.

Appraisal Gap – the difference between the fair market value of a home, as determined by an appraiser, and the amount the homebuyer agreed to pay for the home. The term is generally used in instances where the buyer agreed to pay more than what the home is appraised for.

Area Median Income (AMI) – The median household income for the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Area, as reported in the 1-year or 5-year American Community Survey (ACS).

Co-housing – Cohousing is an intentional, collaborative neighborhood that combines private homes with shared indoor and outdoor spaces designed to support an active and interdependent community life. <https://www.cohousing.org/>

Condominium regime – Vests ownership of a "unit" in an owner, and then places ownership of the common elements in a unit owners association. While the dwelling itself is privately owned, the units themselves and yards are not located on individually-owned lots.

Community Land Trust (CLT) – Usually a not-for-profit organization created for the sole purpose of preserving affordable housing. CLTs preserve affordability by purchasing an existing property and recording a covenant to permanently restrict the units to be affordable (by regulating the rental rates or sale prices).

Co-op/Cooperative Housing – A form of housing where each resident is a shareholder in a corporation that owns the property. Owners of a co-op purchased shares of the cooperative instead of owning it in fee-simple. Ownership of shares entitles the purchaser to the exclusive use of a housing unit in the co-op.

Cost Burden – A measure of how much of one's income is spent on housing costs.

Cost Burdened – When a household spends more than 30% of their income on housing costs.

Department of Housing and Community Development (DHCD) – A Maryland agency that helps residents with homeownership, renting, and energy efficiency as well as housing and community development.

Disparate Impact – A policy or practice which is neutral on its face, but which disproportionately affects a group of people protected by fair housing laws.

Emergency Assistance (EA) – Funding is available on a case by case basis for families in a short period crisis (typically up to 3 months).

Employment Nodes – An area with a concentration of employment uses.

Equity – Allocating resources and opportunities differently based on the needs of individuals to reach an equal outcome

Equity Emphasis Area (EEA) – A regional planning concept adopted by the Metropolitan Washington Council of Governments Board of Directors (MWCOG) to elevate equity and inform future growth and investment decisions. EEAs are 364 of the region's more than 1,300 census tracts with high concentrations of low-income individuals and/or traditionally disadvantaged racial and ethnic population groups.

<https://www.mwcog.org/transportation/planning-areas/fairness-and-accessibility/environmental-justice/equity-emphasis-areas/>

Fair Housing Act – Federal legislation that protects individuals from discrimination in the sale, rental, financing, or advertising of housing based on race, color, religion, sex, disability, family status, and national origin.

Family (HUD definition) – A single person or group of persons residing together regardless of marital status, actual or perceived sexual orientation, or gender identity.

Fannie Mae/ Freddie Mac – Federally-backed home mortgage companies that buy and guarantee mortgages in the secondary mortgage market.

Fee-Simple – A type of ownership that means full and absolute ownership of land and any buildings and improvements on that land.

FHA Certification Program – A City program that helps existing condominium communities gain access to Federal Housing Administration (FHA) mortgages, which are less expensive than conventional mortgages. The program uses monies from the Housing Initiative Fund (HIF) to connect condominium associations with an experienced consultant that helps them file the required paperwork with the US Department of Housing and Urban Development (HUD).

Financial Empowerment Center (FEC) – A city of Gaithersburg program that provides financial counseling to residents to assist with planning and budgeting for things such as buying a home.

Gaithersburg Homebuyer Assistance Loan Program (GHALP) – A City program providing down payment and closing cost assistance to eligible first-time home buyers who purchase a home in the City.

Gap Housing – Residential units that are intended to bridge the architectural and price point gap between higher-priced single

family (detached and townhouse) units and rental-focused multifamily units. Typologies include, but are not limited to, stacked townhouses, quadplexes, and triplexes, as well as duplexes and bungalow courts under a certain size. Typically, Gap Housing has the following characteristics:

- Generally 2-4 units per building
- Individual unit sizes between a typical multifamily unit and a typical townhouse
- Overall massing similar to and compatible with townhouses and detached homes, with various typologies included within the same block to enhance the streetscape and walkability
- Parking that is either shared or dedicated to each unit.

Group Quarters – Residences like rooming houses, nursing homes, convents, and group homes.

Home Owners Association (HOA) – Governs and manages regulations of a residential community and also maintains common areas.

Home Mortgage Disclosure Act (HMDA) – A federal law that requires financial institutions to provide mortgage data to the public.

Household – All of the people who occupy a housing unit.

Housing affordability – Housing with a price point that allows households of various incomes to rent or purchase it by spending no more than 30% of their annual income.

Housing Choice Voucher (HCV) – A federally-funded, locally administered rental assistance program that subsidizes the rent of

lower-income families, the elderly and disabled to afford decent, safe housing in the private market through the use of federal funds.

Housing Initiative Fund (HIF) – City funds used as loans to help the preservation or creation of affordable housing (both for-sale and rental).

Housing Opportunities Commission (HOC) – A Montgomery County program that was established in 1974 to better respond to the County’s need for affordable housing. HOC is authorized to acquire, own, lease, and operate housing; to provide for the construction or renovation of housing; obtain financial assistance from any public or private source to assist its housing activities; and arrange for social services, resident services and daycare. It administers the federal Housing Choice Voucher program for Montgomery County.

Low Income (LI) Household – An individual or persons living together, who have an adjusted income that is between 50% and 80% of area median income (AMI).

Low Income Housing Tax Credit (LIHTC) – This federal tax credit is used to construct or rehabilitate affordable rental housing for low-income households. The LIHTC was enacted as part of the 1986 Tax Reform Act and has been modified numerous times. Since the mid-1990s, the LIHTC program has supported the construction or rehabilitation of about 110,000 affordable rental units each year (nationally). The State of Maryland administers the tax credit and it is used by developers to create or preserve affordable rental homes.

Low and Moderate Income (LMI) Household – An individual or persons living together, who have an adjusted income that does not exceed 120% of area median income (AMI).

Metropolitan Washington Council of Governments (MWCOC) – An independent, non-profit association of elected officials from local governments in Maryland and Virginia which creates policies and compiles data and strategies for the Washington D.C. region such as equity, transit, housing, and climate.

Moderate Income (MI) Household – An individual or persons living together, who have an adjusted income that is between 80% and 120% of area median income (AMI).

Moderately Priced Dwelling Unit (MPDU) – City regulated affordable housing. These price- and income controlled units are available to those making from 50% to 80% of the area median income (AMI).

People of Color – persons who identify as black/African-American, American Indian/Native Alaskan (AIAN), Asian, Native Hawaiian/Pacific Islander (NHPI), Hispanic, multi-racial, or some other race, People of Color excludes persons who identify as either white or white, non-Hispanic.

Severely Cost Burdened – When a household spends more than 50% of their income on housing costs.

Social Justice – Fairness in the distribution of wealth, opportunities, and privileges. Can apply to healthcare, employment, housing, etc.

Universal Design – In housing, a design that makes the house safe and accessible for people of all abilities.

Very Low Income (VLI) – An individual or persons living together, who have an adjusted income that does not exceed 50% of area median income (AMI).

Workforce Housing Unit (WFHU) – City regulated affordable housing. These price-controlled units are available to those making 80% to 120% of the area median income (AMI).



3. Background

*“...it is hard to argue that housing is not a fundamental human need. Decent, affordable housing should be a basic right for everybody in this country. The reason is simple: without stable shelter, **everything else falls apart.**”*

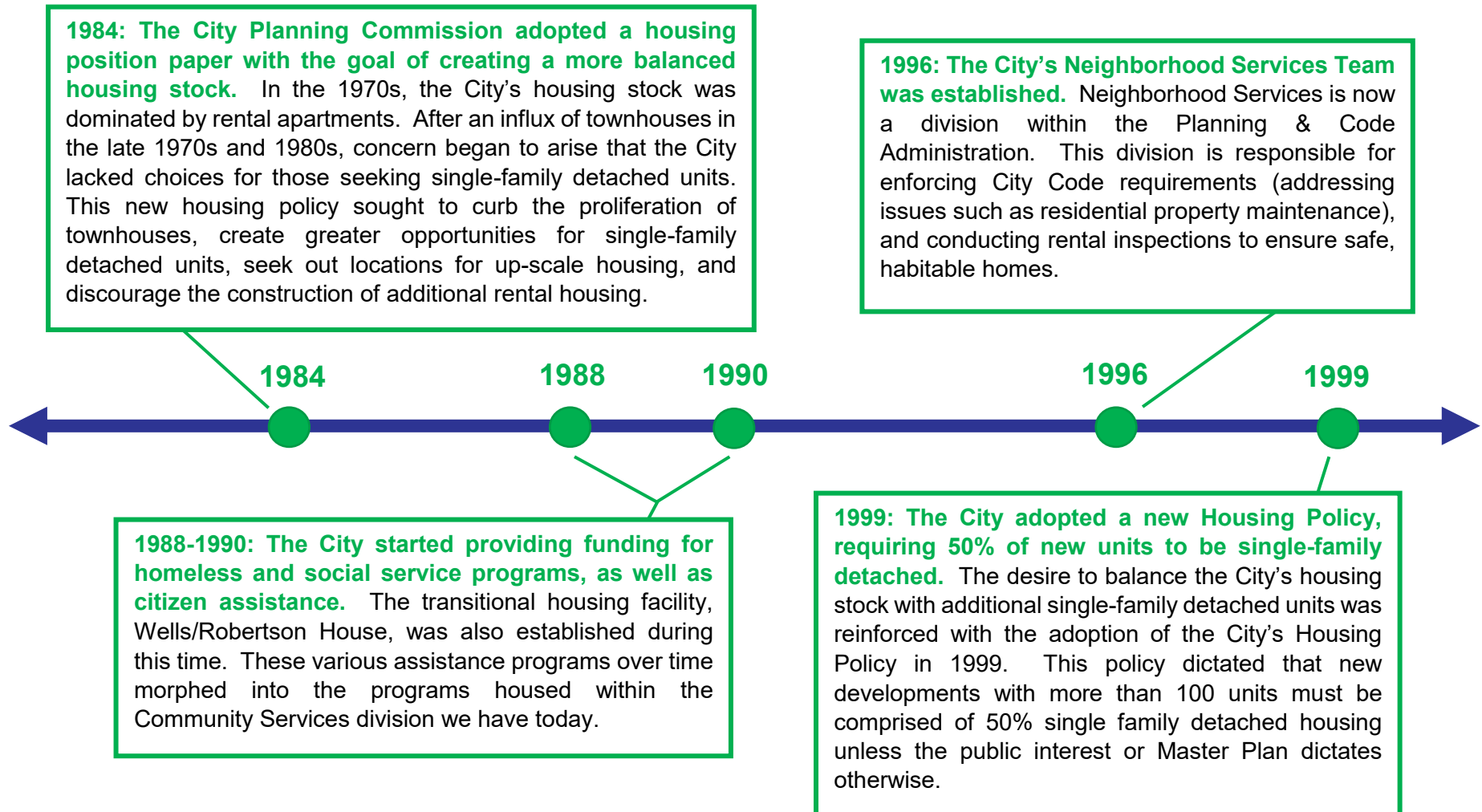
- Matthew Desmond, [Evicted: Poverty and Profit in the American City](#)

3.1 Timeline

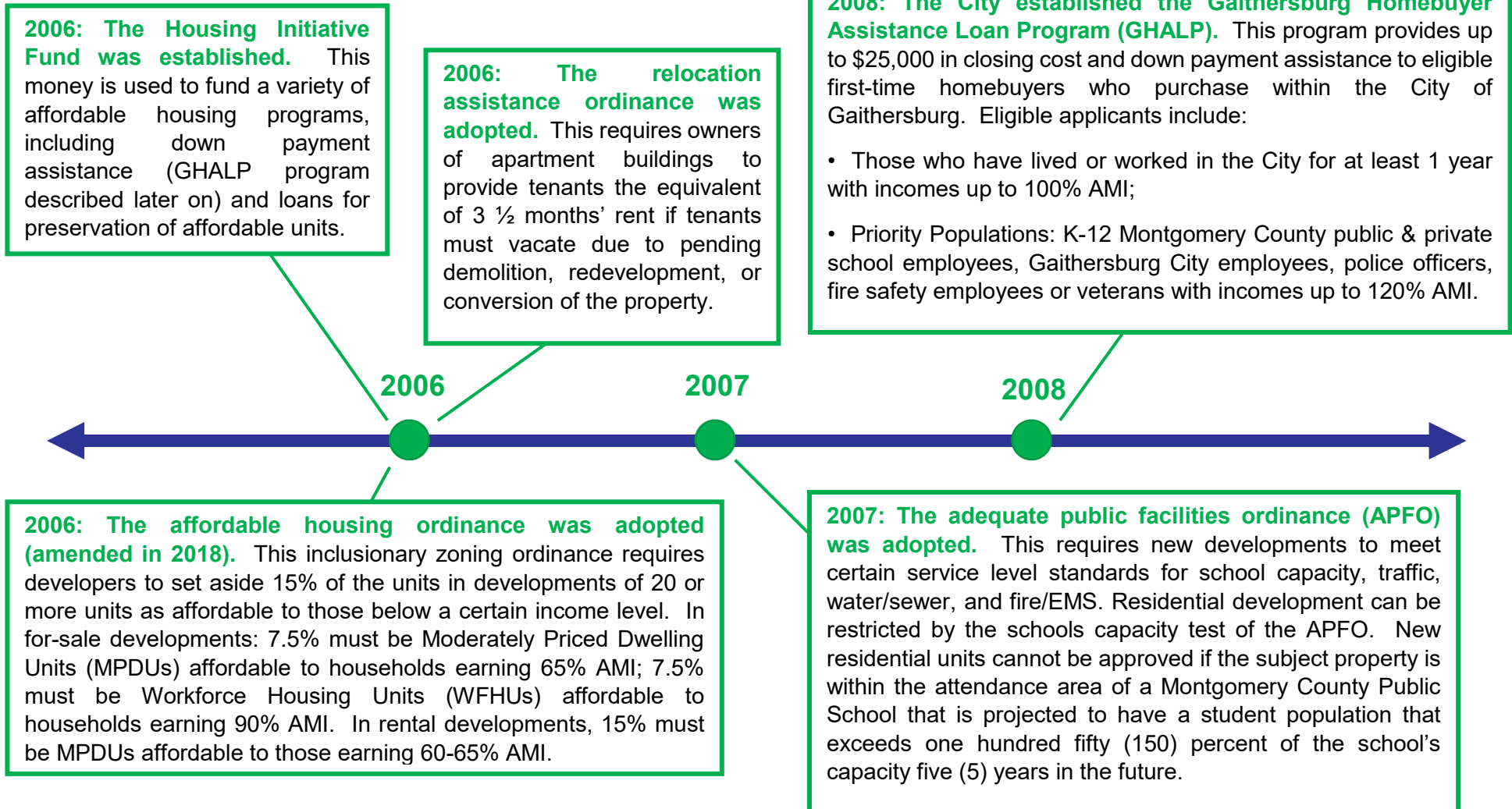
The City has addressed housing needs in various ways over the past few decades. As the City grew, policies and programs regarding housing evolved to match the needs of the population and priorities of City leaders. The timeline on the next few pages outlines major milestones in the City’s approach to addressing housing needs and new residential development. It includes the adoption of major ordinances, such as the Affordable Housing Ordinance, the formation of City departments responsible for ensuring the proper maintenance of housing, and the establishment of financial assistance and counseling programs. However, it is not

an exhaustive list. The City’s efforts related to housing extend beyond the major policies and programs highlighted on the timeline and include other actions such as opting into Montgomery County’s Commission on Common Ownership Communities (CCOC) and the FHA certification program. The CCOC ensures proper creation and operation of HOAs, Condo Associations, and Cooperative Housing Corporations. The FHA certification program helps existing condominium communities gain access to Federal Housing Administration (FHA) mortgages, which are less expensive than conventional mortgages.

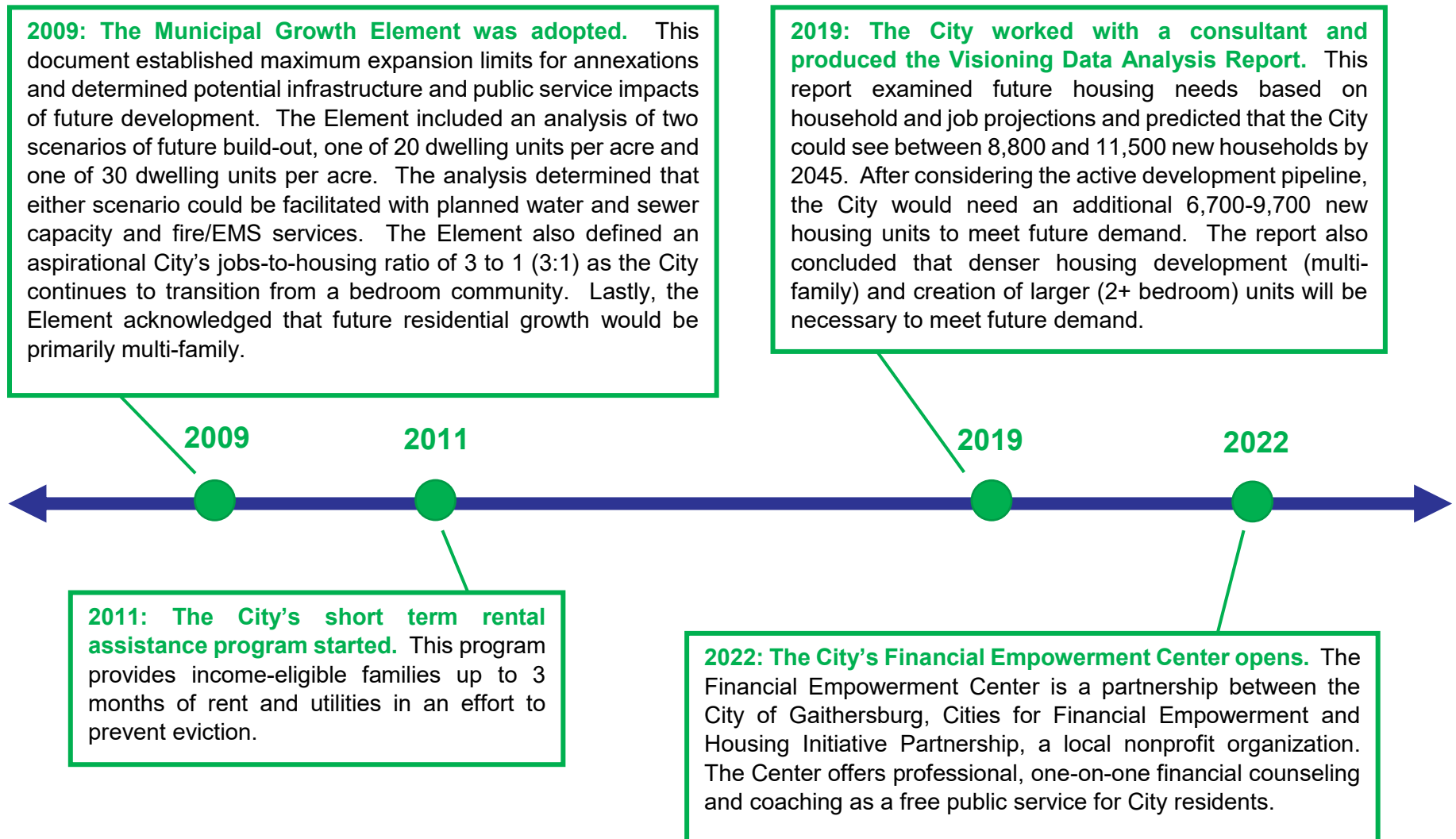
1980-1999: The City first started adopting official policies on housing in the 1980s and 1990s, in an effort to maintain a balanced housing stock. These policies have not been revised since 1999, and do not reflect the needs of the City today. This era also saw the beginning of City funding dedicated to housing assistance programs and staff teams focused on monitoring housing unit conditions in the City.



2000-2008: The City began directly addressing the production of affordable housing in 2006 with the adoption of the affordable housing ordinance. Other ordinances adopted around this time addressed public facility standards for new development and relocation assistance. The early 2000s also saw the establishment of funding and loan programs that are key aspects of the City's affordable housing strategy today.



2009-2022: Since 2009, the City has conducted multiple data exercises to determine the future need for housing to meet projected population growth. City funding expanded to include short term rental assistance in 2011, and most recently, the Financial Empowerment Center opened, providing financial counseling to residents to assist with planning and budgeting for things such as buying a home.



3.2 Demographic Data

The following section provides an overview of basic demographic data for the City, including population, household characteristics, age, and race. These characteristics help inform the need for housing in the City, including the number, type, and size of units most needed. Monitoring the City’s population characteristics and how they have changed over time can help City staff establish priorities and develop strategies for addressing future housing needs.

In 2020, the City had 25,908 households and a population of 69,657. Gaithersburg’s population and households have grown at about the same rate since 2000, both increasing by about 32%. The average household size has remained fairly steady since 2000, ranging from 2.65 to 2.70, as shown in the table below.¹

Average Household Size

2000	2010	2020
2.65	2.70	2.67

¹ Decennial Censuses 2000, 2010, and 2020.

² The block group with the highest average household size of 6.0 has only an extended stay hotel for “residential units” (as defined by the Census Bureau). One of the two block groups with the lowest average household sizes contains Asbury Methodist Village (senior housing), with many residents who are single

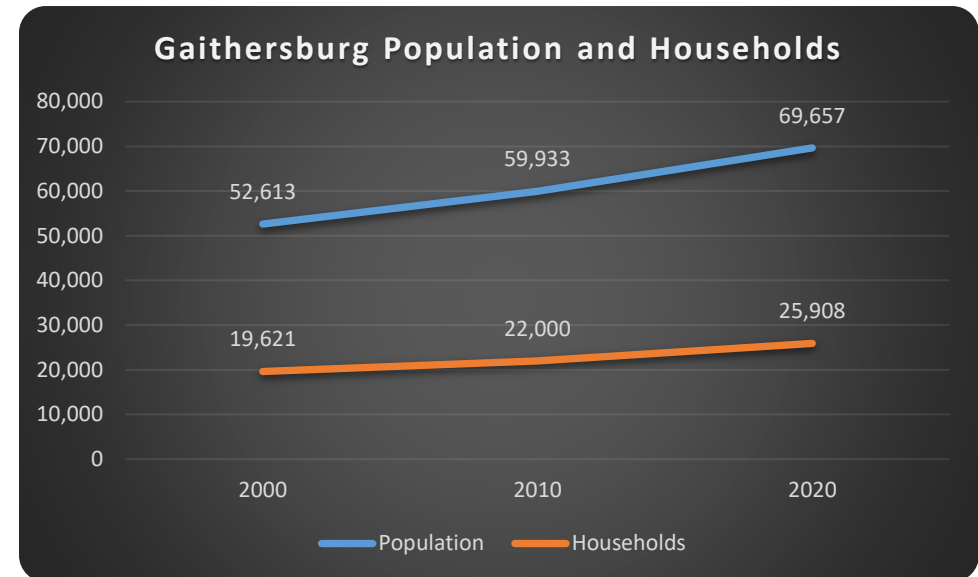
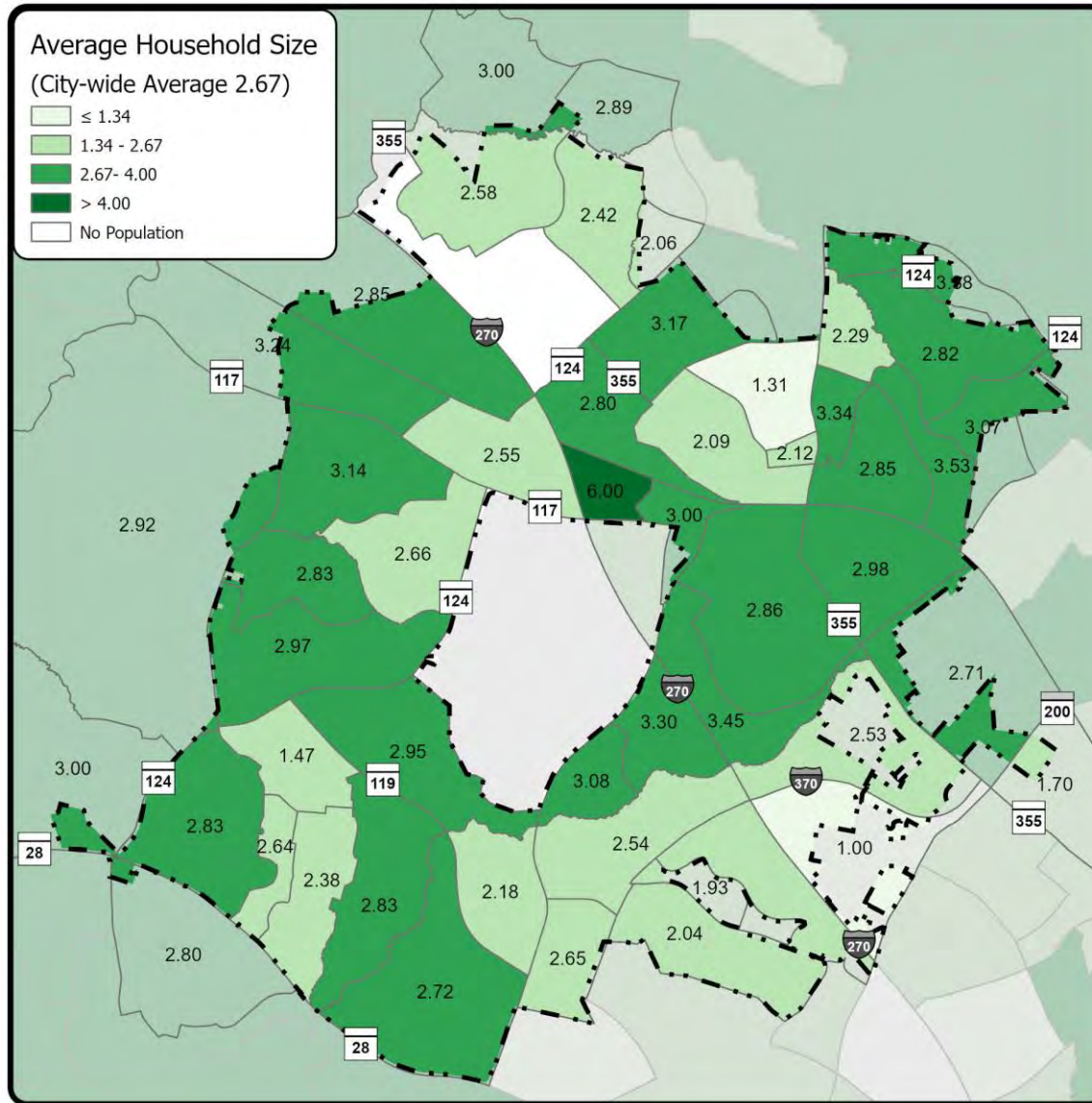


Chart 1. Population and Households, 2000-2020

While the City’s average household size overall was 2.67 in 2020, average household size varies by Census Block Group², as seen in the map below.³ Some of the largest and smallest household sizes shown on the map may be attributable to a very small number of residential units within the block group.

households. The other block group with the lowest average household size is an industrial park partly in the County, which has no residential units other than possible on-site apartments for management personnel associated with self-storage or similar uses.

³ Decennial Census, 2020.



Map 1. Average Household Size by Census Block Group, 2020 Decennial Census

Families with children under 18 make up about a third of the City's households, while householders living alone make up about a quarter of City households. The proportion of households that are single householders living alone has decreased slightly since 2010, while the proportion that are families with children under 18 remained the same. The proportion of households with one or more members aged 60 and over has increased from 26% in 2010 to 33% in 2020. This aligns with the data shown on Chart 2, which shows that both the working age and youth populations have decreased since 2010, while the senior population has increased. This reflects population trends nationwide as the baby boomer generation ages into retirement.⁴

Household Type

	2010	2015	2020
Families w/ Children Under 18	31.6%	36.3%	31.7%
Single Householder Living Alone	28.6%	26.0%	25.7%
One or more persons 60+ years old	26.3%	30.2%	33.4%

The racial makeup of the City is diverse, with no single race forming a majority of the population. In 2020, the largest racial/ethnic group was White, not Hispanic (32%), followed by Hispanic, (29%). The White population has decreased since 2010, while the Black, Asian, Multiracial, and Hispanic populations have all increased.⁵

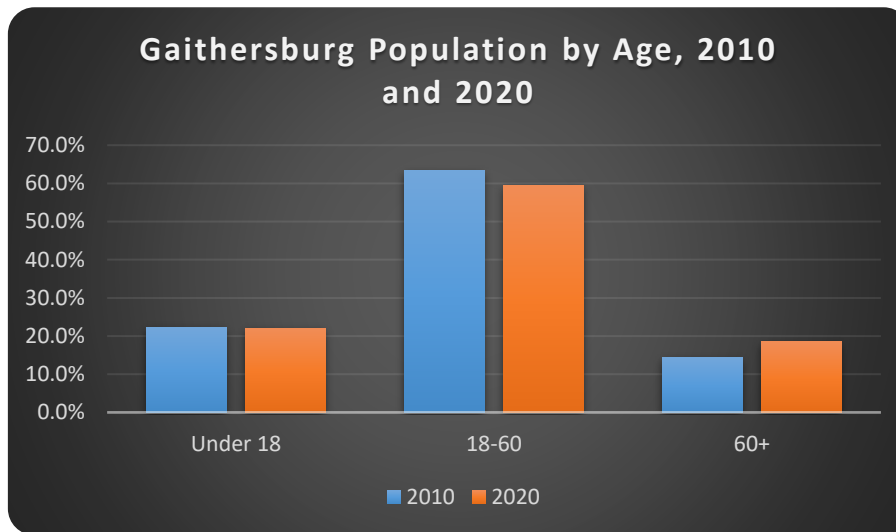


Chart 2. Population by Age, 2000-2020

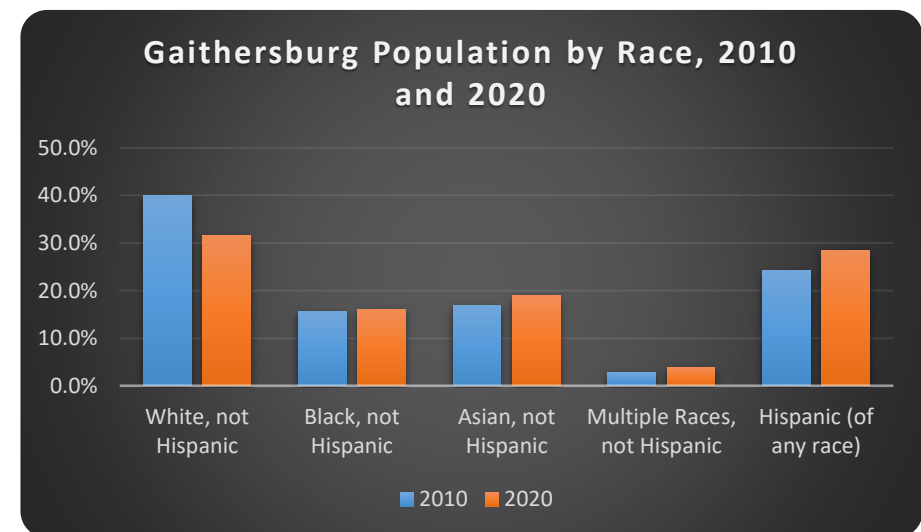
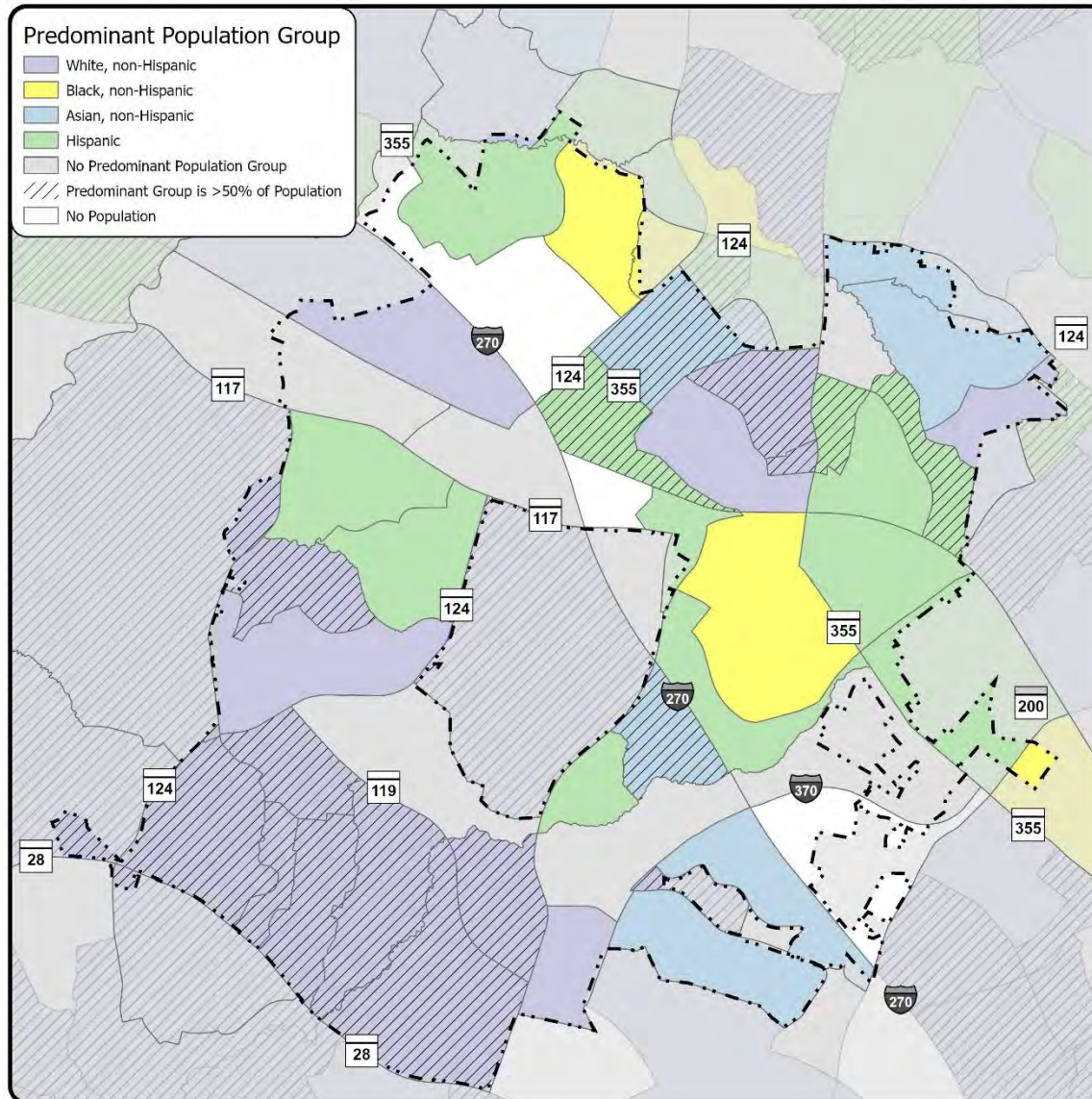


Chart 3. Population by Race, 2000-2020

⁴ American Community Survey (ACS), 5-year 2020

⁵ Decennial Censuses 2010 and 2020. American Indian, Hawaiian and Pacific Islander, and Other Race were not included in the chart as they each make up less than 1% of the City's population.



Map 2. Predominant Population Group, 2020 5-year ACS

Key Points

- Future residential development and housing assistance programs should reflect the needs of the City's diverse population.
- The City's future housing stock should be balanced to reflect the changing makeup of the City's households. Namely, families with children are remaining steady while single householders living alone are declining relative to total households, indicating a greater need for housing unit types that can accommodate families as opposed to singles.
- As the population continues to age, attention should be paid to the need for senior housing.
- The City's population has been steadily growing and is projected to continue to grow in the foreseeable future. This population growth will increase demand for more housing, potentially impacting rent and home prices.



The Carnegie, a new senior housing project under construction

3.3 Socioeconomic Data

The following section provides an overview of City socio-economic data, including income, home costs, and employment. An analysis of this data helps City staff understand if the housing in the City is affordable to City residents, which will in turn inform the need for housing assistance programs and/or strategies to increase the supply of affordable housing.

The median household income for the City was \$91,845 in 2020, an increase of 17% over 2010. The City’s median income remains lower than the regional DC Metro median income of \$106,415. Median gross rent was \$1,754 in 2020 (higher than the DC Metro area’s \$1,718), and the median home sales price was \$411,250. As seen in Chart 4, rent growth has greatly outpaced income growth since 2010. Home sales prices increased at a similar rate to incomes between 2010 and 2020; however, from 2020 to September 2022, home prices increased 26%, from \$411,250 to \$517,100.⁶

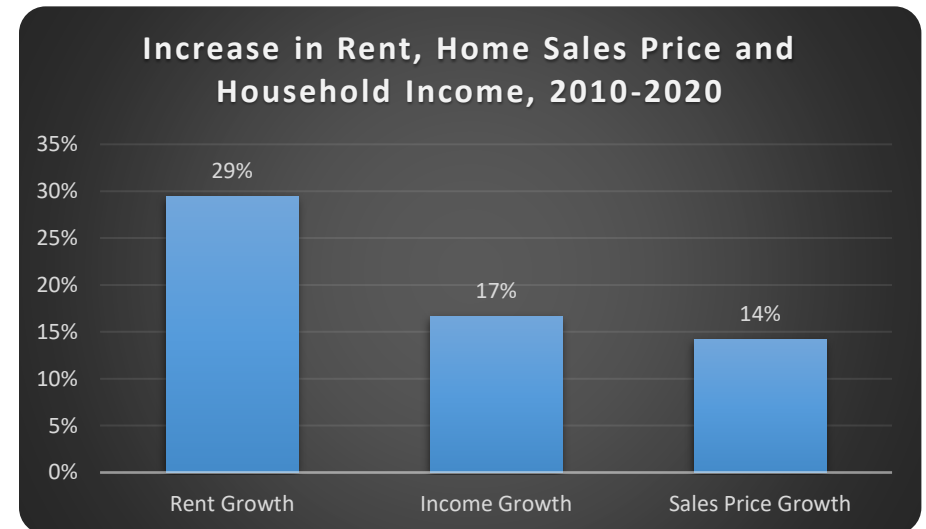


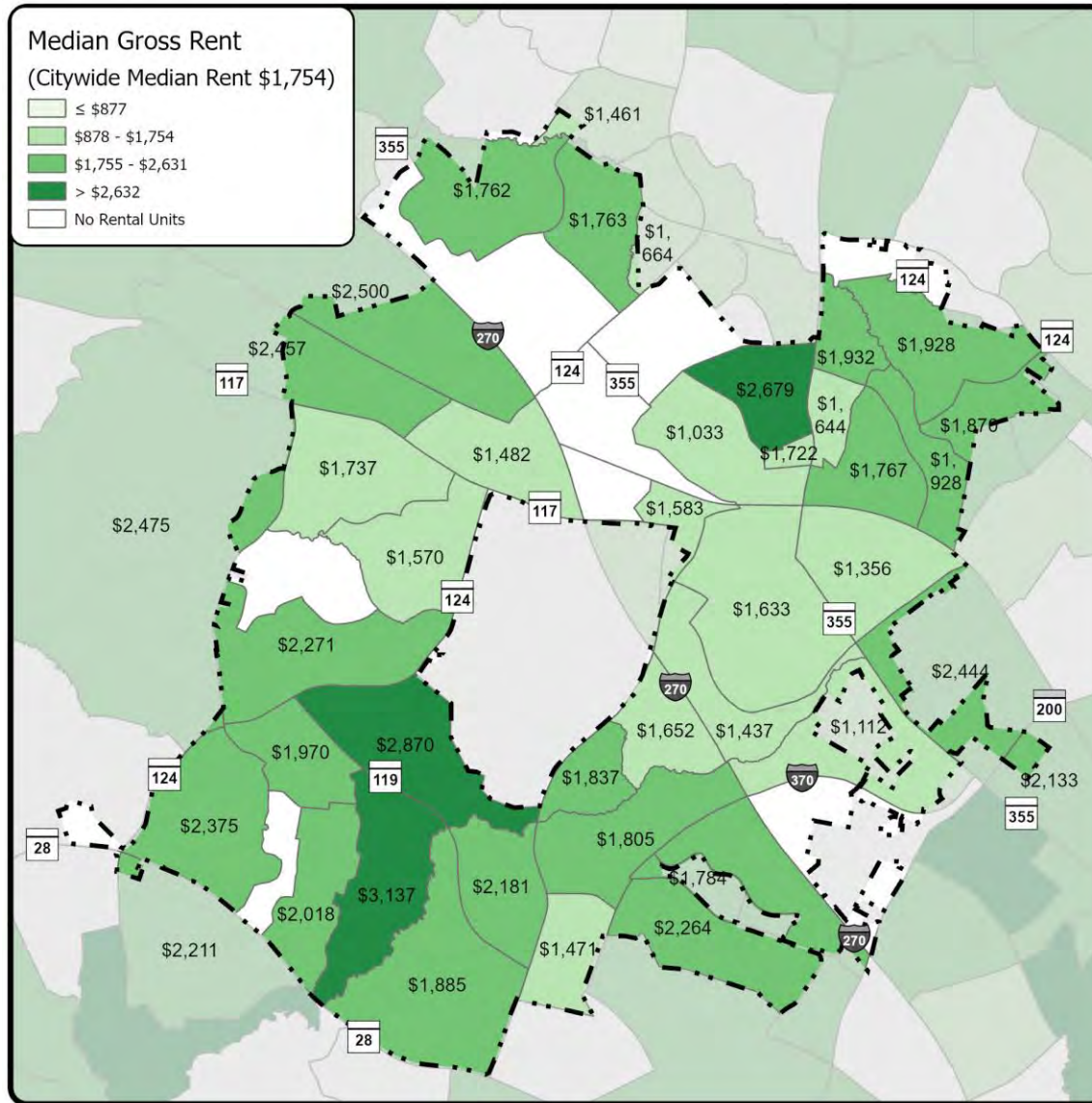
Chart 4. Rent, Sales Price, and Income

The maps on the following pages show how household income, rent and sales price vary throughout different parts of the City. As seen in all three of the following maps, the east side of the City generally has lower rents, sales prices, and household incomes.

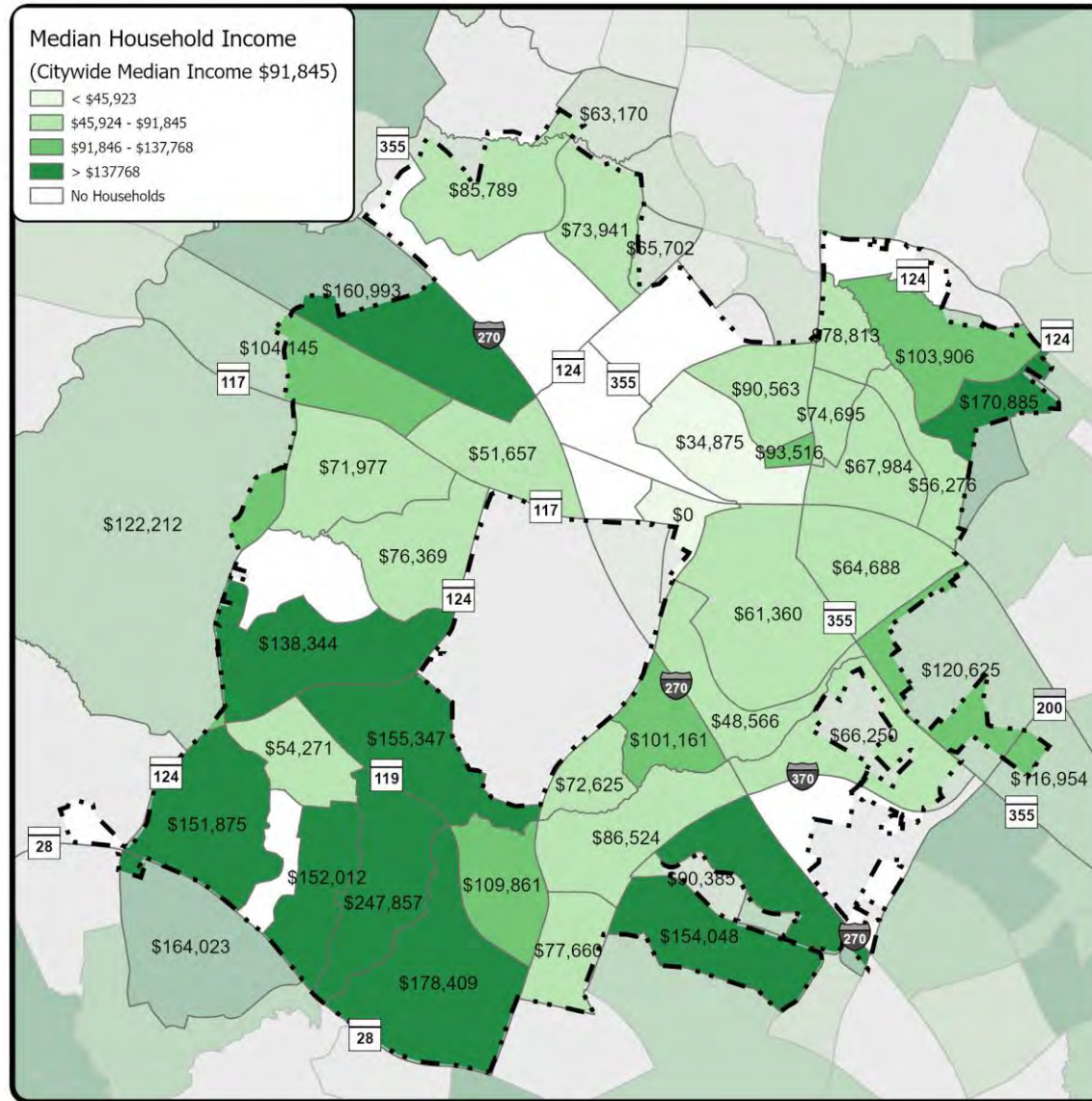
Incomes and Housing Costs

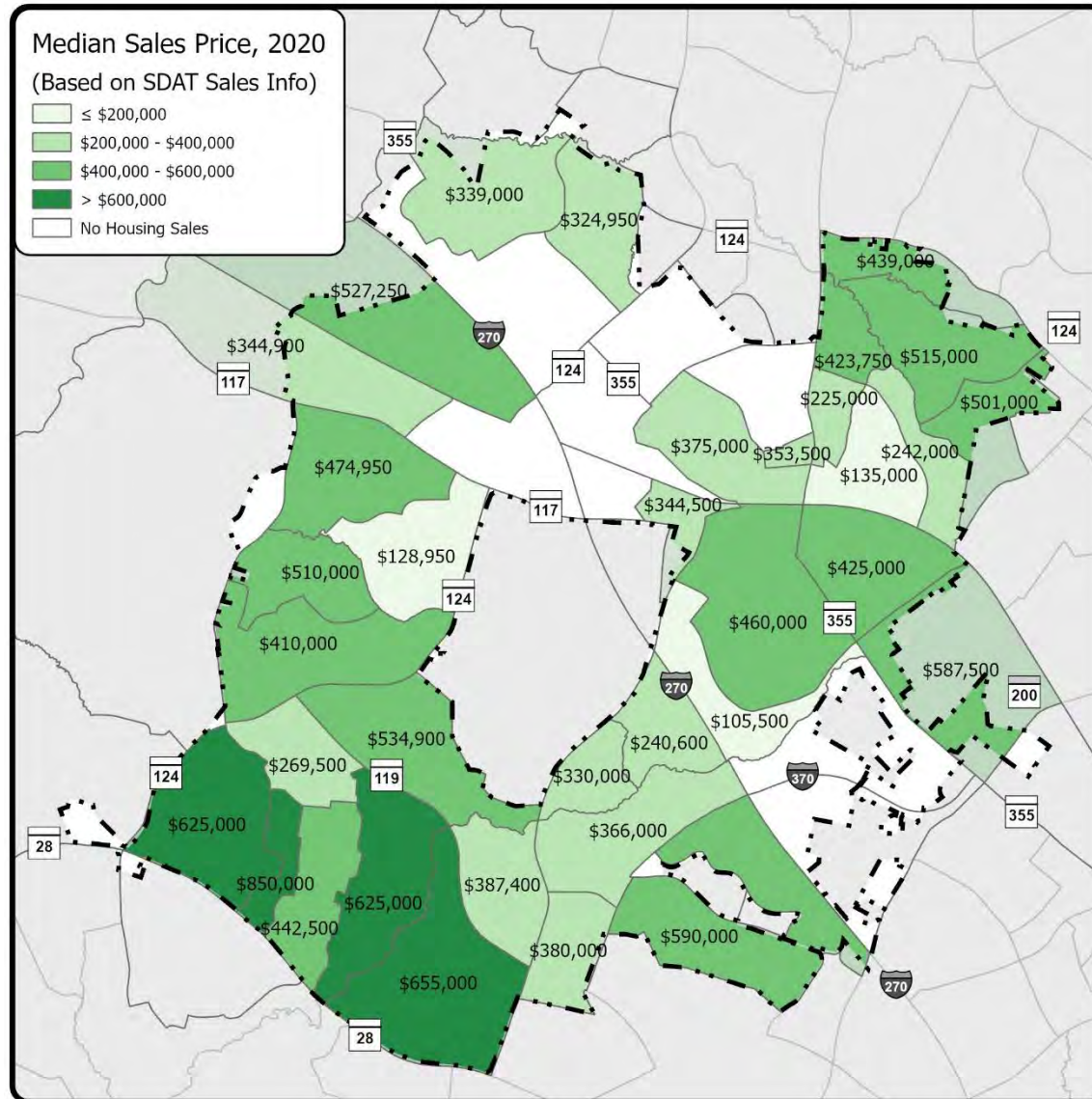
	2010	2015	2020
Median Household Income	\$78,736	\$80,734	\$91,845
Median Gross Rent	\$1,355	\$1,543	\$1,754
Median Sales Price	\$360,000	\$395,000	\$411,250

⁶ American Community Survey (ACS), 2020 5-Year; SDAT



Map 3. Median Gross Rent, 2020 5-year ACS



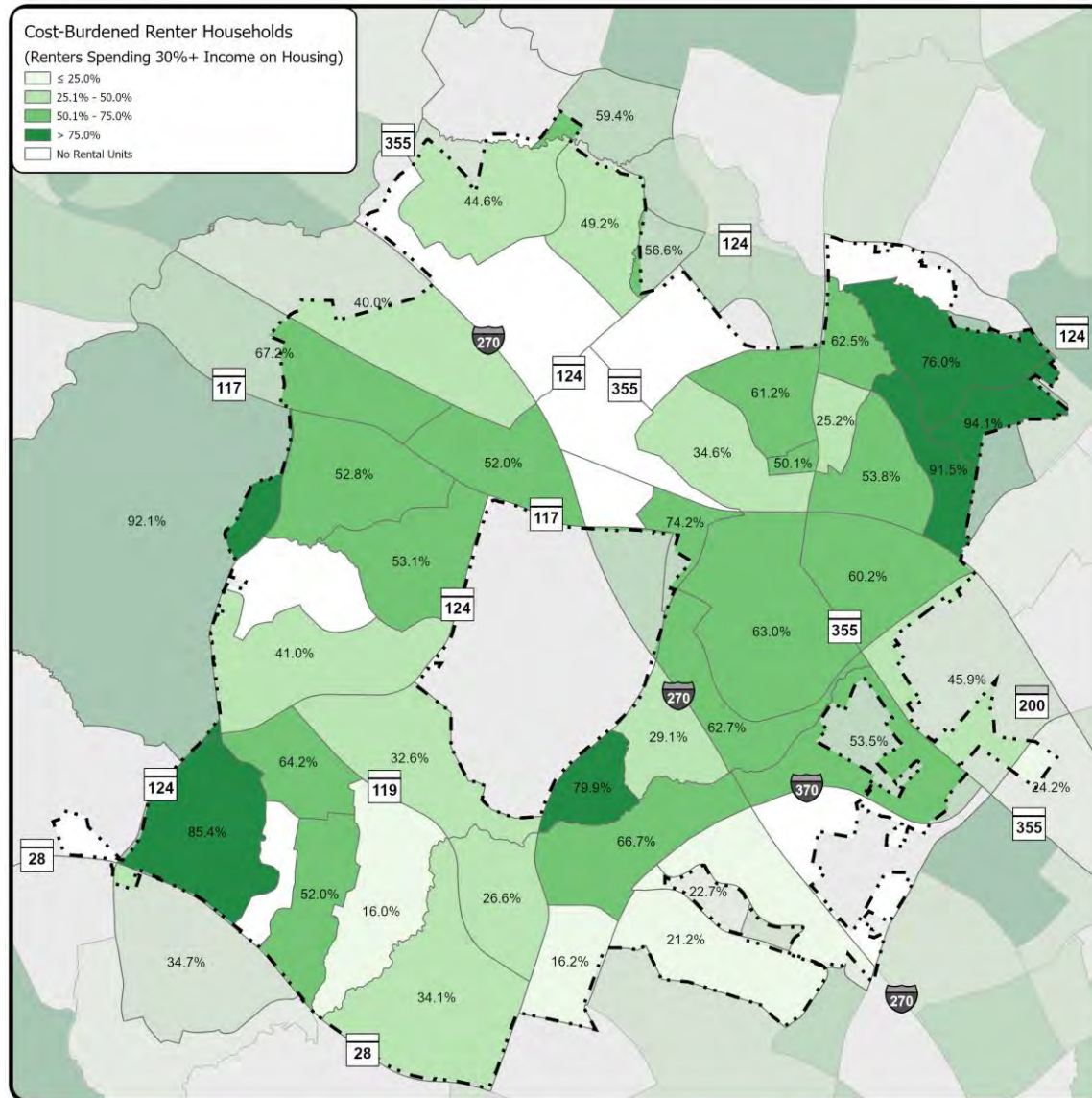


Cost burden is a measure of how much of one’s income is spent on housing costs. Households are considered cost burdened if they spend more than 30% of their income on housing costs, and are considered severely housing cost burdened if they spend more than 50% of their income on housing costs. About half of the renter households in the City were considered housing cost burdened in 2020, and about a quarter were severely housing cost burdened. The cost burden rate for owner households with a mortgage is lower, with only 31% of those households being cost burdened and 10% severely cost burdened in 2020. From 2010 to 2020, the cost burden rate for renters remained fairly steady, while the cost burden rate for owner households with a mortgage decreased.

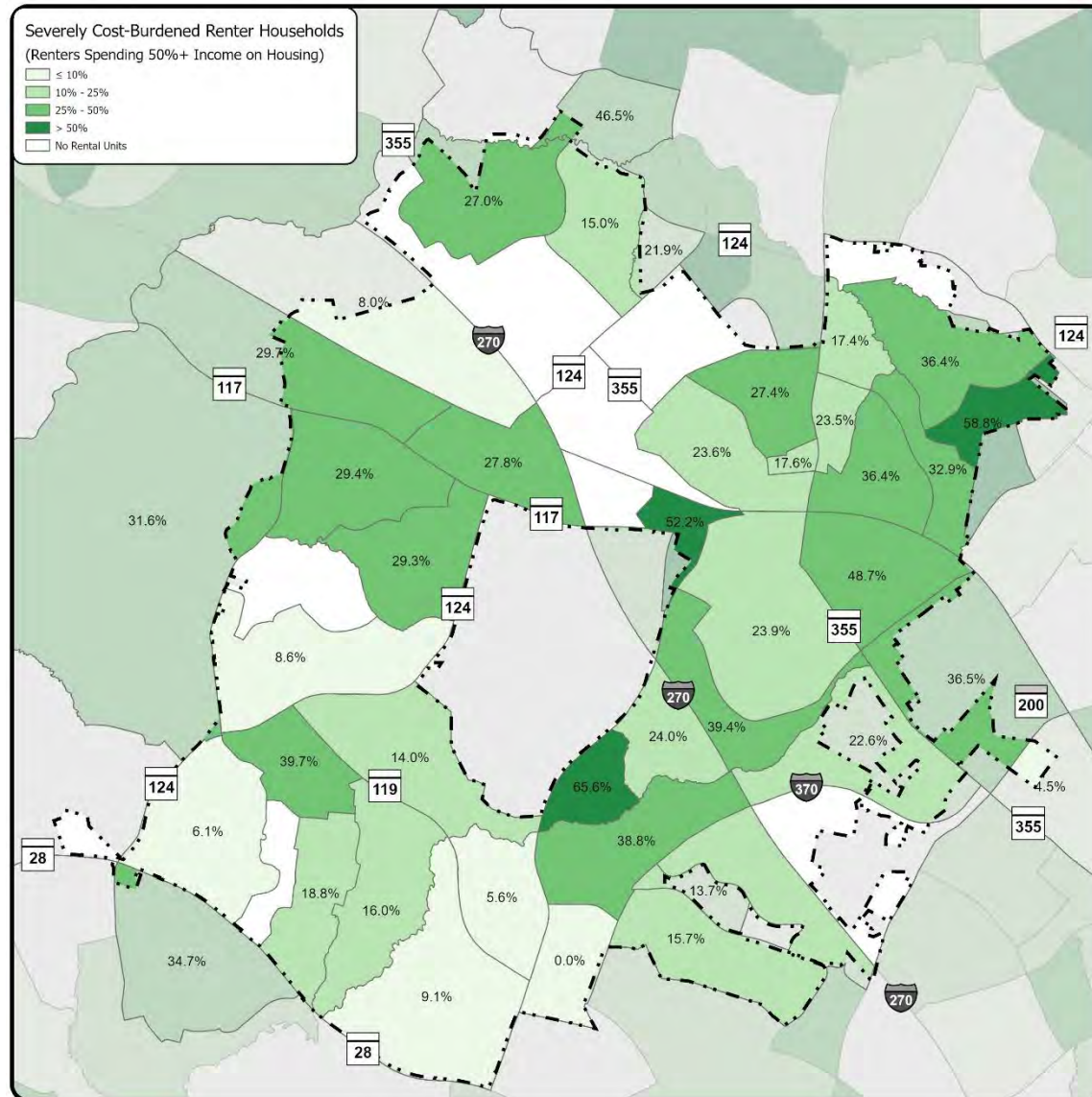
Cost Burden

	2010	2015	2020
Renter Households with Rent > 30% of Income	49.4%	51.7%	50.0%
Renter Households with Rent > 50% of Income	22.3%	24.8%	25.8%
Owner Households with Mortgage > 30% of Income	38.2%	34.2%	30.8%
Owner Households with Mortgage > 50% of Income	17.4%	15.5%	10.0%

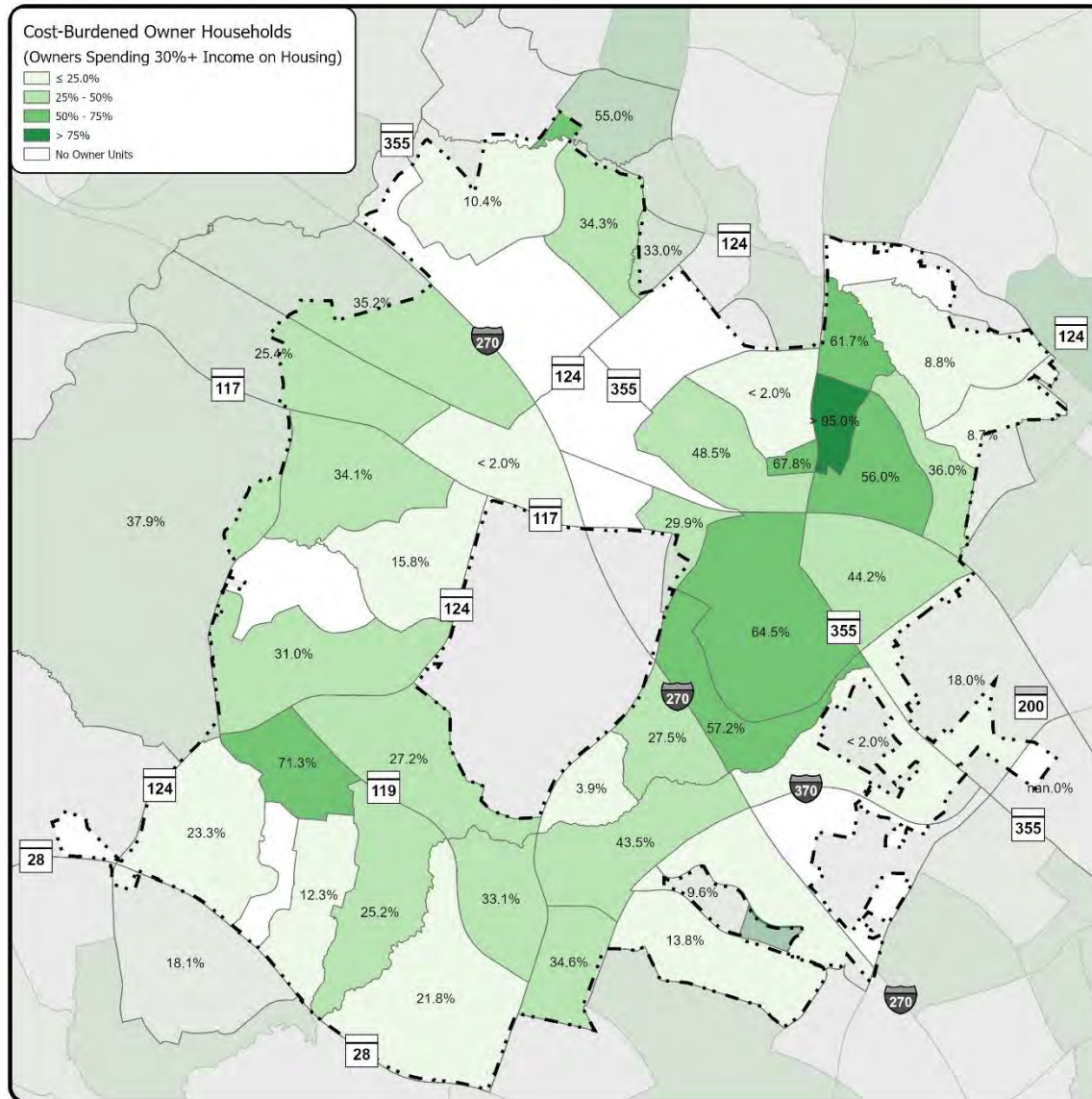
As with household income, cost burden also varies throughout different parts of the City and as will be discussed later in the Element, by race. The maps below show the percentage of renters and owners by block group who spend more than 30% (Maps 6 and 8) and more than 50% (Maps 7 and 9) of their income on housing costs.



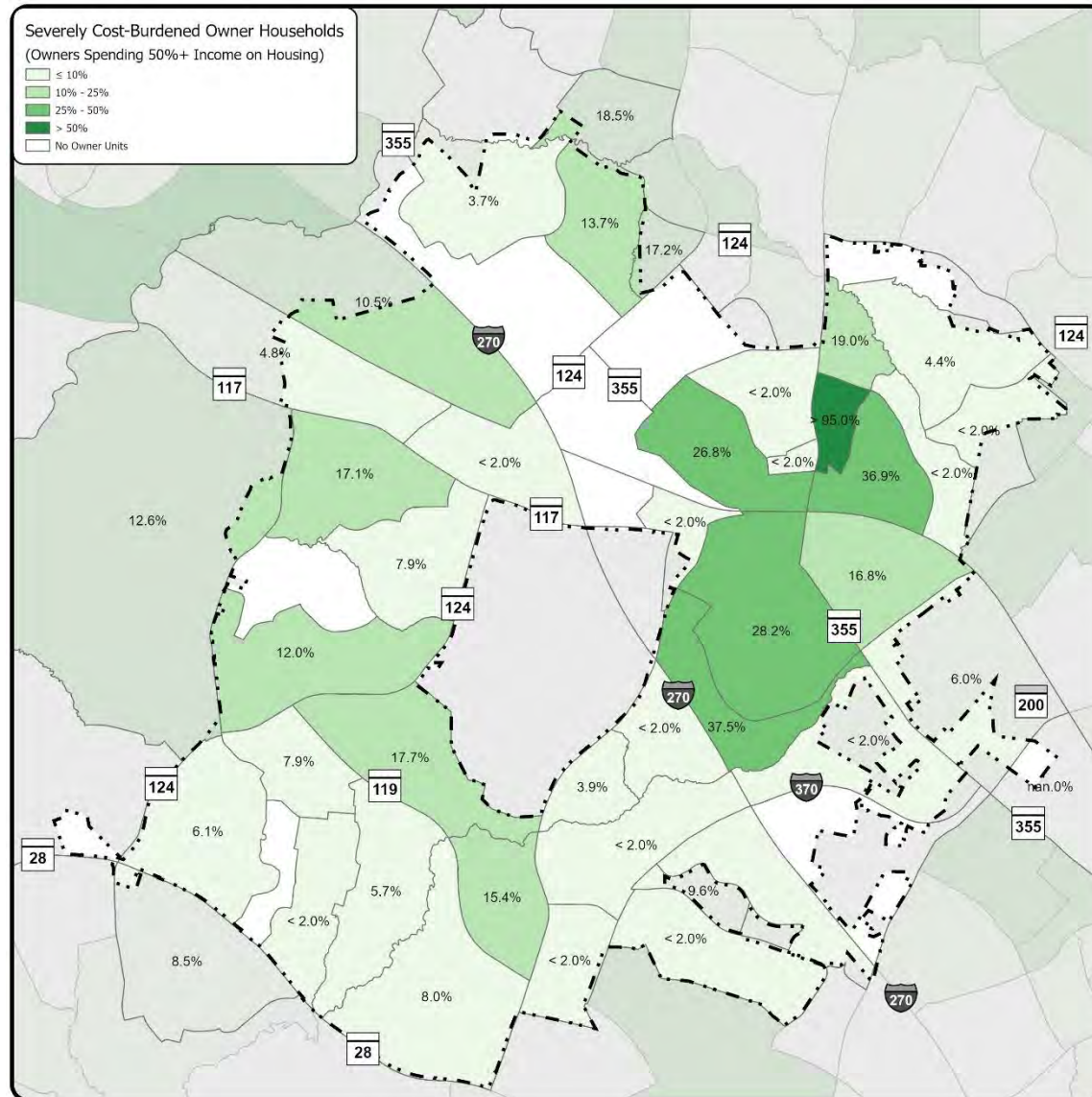
Map 6. Cost-Burdened Renters, 2020 5-year ACS



Map 7. Severely Cost-Burdened Renters, 2020 5-year ACS



Map 8. Cost-Burdened Owners, 2020 5-year ACS



Map 9. Severely Cost-Burdened Owners, 2020 5-year ACS

Employment data shows that the largest job sector in Gaithersburg is Professional, Scientific, and Technical Services, making up 19% of jobs in the City, followed by Retail Trade, making up 13% of jobs in the City. The table below highlights those job sectors where there is a substantial difference between jobs held by City residents and jobs available in the City. For example, 881 City residents work in

Manufacturing, but there are 4,348 Manufacturing jobs in the City, indicating that most of these jobs are held by people who live outside of the City. The payroll data included in the table shows that this mismatch occurs in both high-paying and low-paying sectors.⁷

	2019 Gaithersburg Residents		2019 Gaithersburg Jobs		2020 ⁸ Average Annual Payroll per Employee
Manufacturing	881	3%	4,348	10%	\$89,817
Retail Trade	2,672	9%	5,928	13%	\$32,790
Finance and Insurance	1,101	4%	4,453	10%	\$137,472
Professional, Scientific, and Technical Services	5,216	17%	8,465	19%	\$102,680
Accommodation and Food Services	2,660	9%	4,289	10%	\$18,797
Public Administration	2,759	9%	629	1%	No data

Key Points

- The increase in housing costs and large proportion of households that are cost burdened demonstrate the importance of developing strategies to close the affordability gap, either through assistance programs, the preservation of affordable units, or the development of new affordable units.
- Disparities in incomes and cost burden throughout the City indicate the need to develop a variety of approaches to closing the affordability gap. A “one-size-fits-all” approach will not be adequate to assist all households in the City that currently face housing challenges.

⁷ Census Bureau, 2019 Longitudinal Employer-Household Dynamics (LEHD)

⁸ Payroll data was not available for 2019

- Housing affordability cannot be solved solely through a focus on financial assistance and the physical housing stock. The City must also take into account the types of jobs available to and

held by City residents and consider overall strategies for boosting wealth as the City's median household income has not kept pace with the growth in housing costs.

3.4 Existing Housing Stock

The following section provides information on the current housing stock in the City and further analysis of the City's affordability gap and potential for existing units to turnover. These analyses provide a baseline and attempt to quantify the affordability gap in the City currently. Understanding the housing we have now and how adequately it serves the existing population will help staff develop appropriate strategies and determine where to focus resources to best assist residents facing housing challenges.

The chart to the right shows the distribution of housing units by type. Just over half of the City's housing stock is multi-family, including both rental apartments and condominiums. Just over one quarter are townhouses or duplexes, with the majority being townhouses, and only 18% are single-family detached. The last 4% are made up of 2-over-2 condos and group quarters. Group quarters includes residences like rooming houses, nursing homes, convents, and group homes.

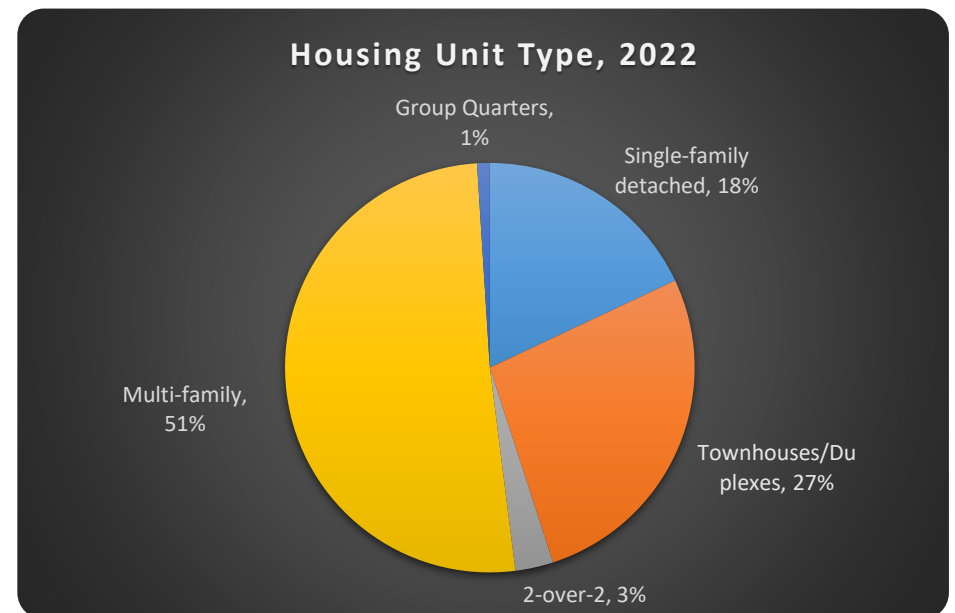


Chart 5. Housing Units Type

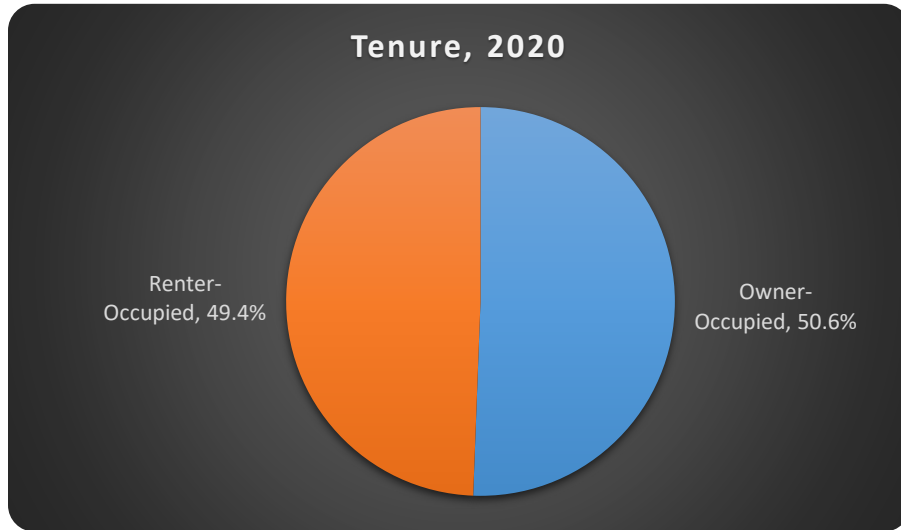


Chart 6. Tenure

As of 2020, approximately half of the City’s housing units were owner-occupied and half were renter-occupied.⁹ This breakdown does not always match the number of rental apartments in the City as some condominiums and single-family homes may be rented out.

The chart to the right shows the breakdown of City rental apartment units by number of bedrooms. The majority of units are either one-bedroom (43%) or two-bedroom (46%). Three-bedroom units make-up 7% and studios make-up 4% of total units. The table to the right shows the overall City vacancy rate of apartment units by size as of July 2022. Three-bedroom units had the lowest vacancy rate at 1.8%, while studios had the highest at 4.1%.¹⁰

⁹ American Community Survey (ACS), 2020 5-Year

¹⁰ CoStar

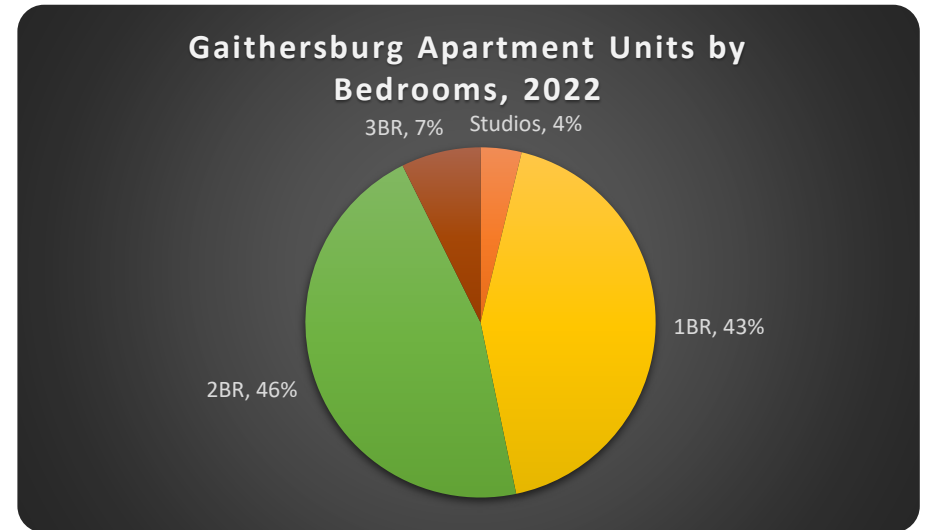


Chart 7. Apartment Unit Size

Overall City Vacancy Rate for Rental Apartment Units¹¹

Studio	4.1%
1 Bedroom	3.2%
2 Bedroom	2.8%
3 Bedroom	1.8%

¹¹ CoStar

The majority of housing units in the City were built between 1970 and 2000, with the median year built being 1988. The graph below shows the breakdown of housing by decade built.¹²

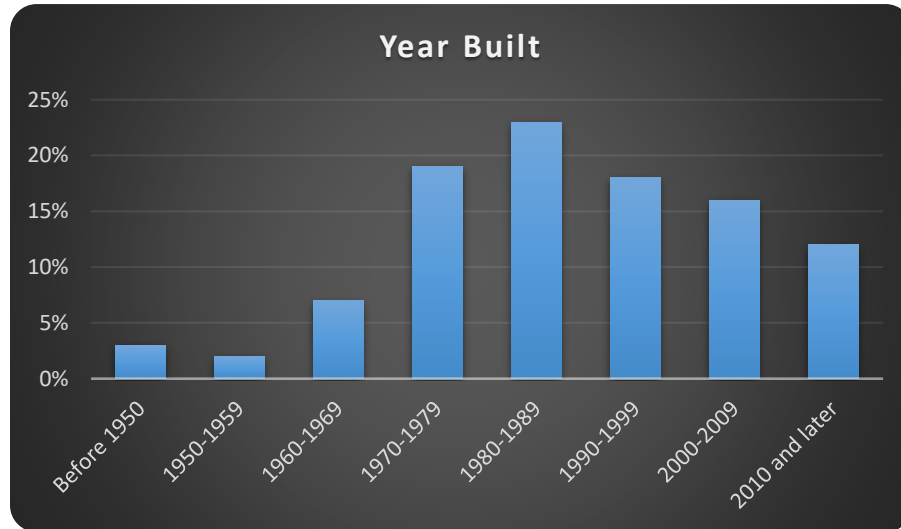


Chart 8. Year Built

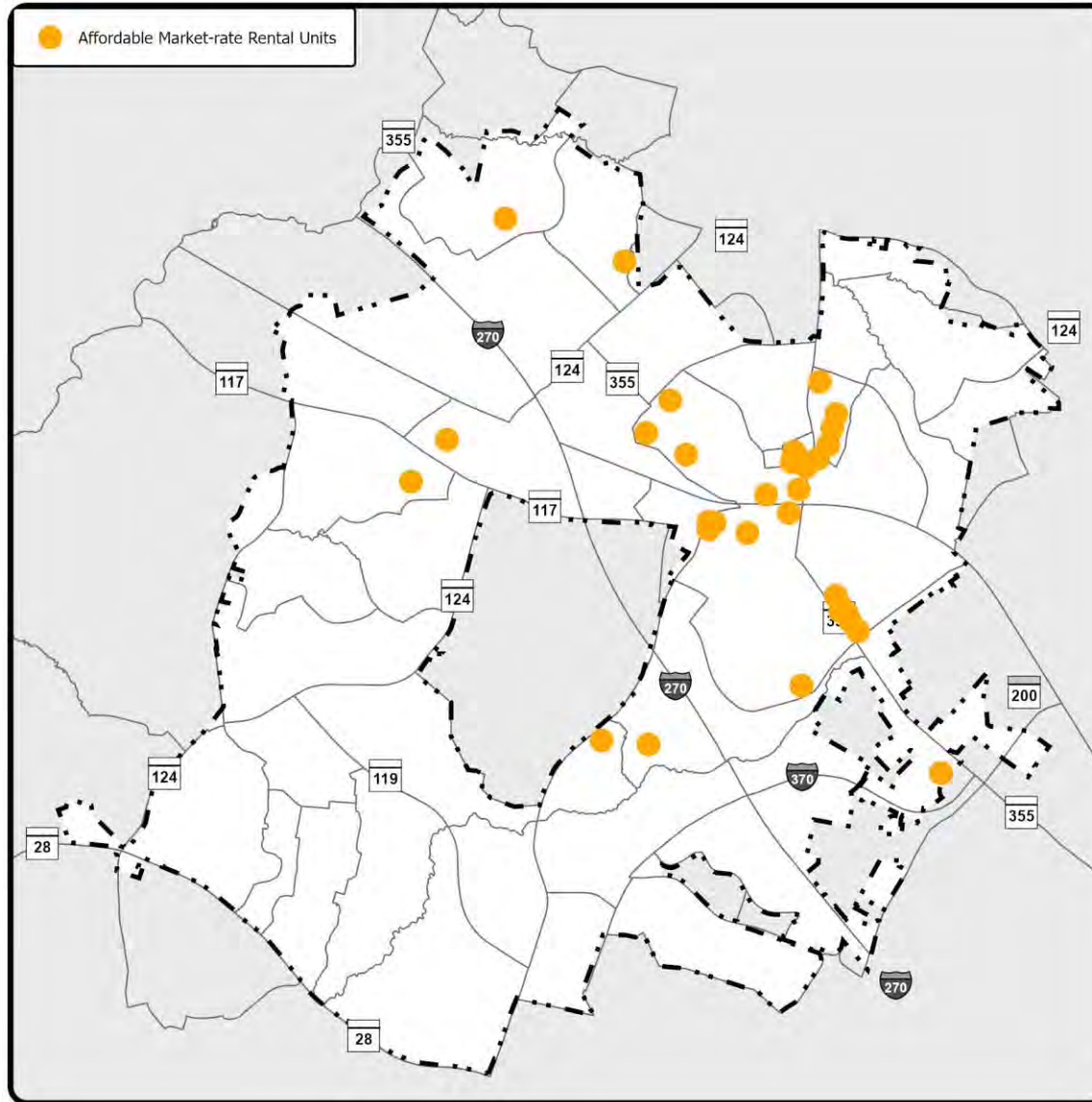
The City has just over 1,800 approved income and price-restricted housing units, with 1,541 completed units. This includes both City regulated and non-City regulated units. There are currently 496 rental MPDUs/WFHUs and 89 owner MPDUs/WFHUs regulated by the City (585 units total). The remaining income and price restricted units are regulated by Montgomery County’s Housing Opportunities Commission, federal programs, or other housing non-profit

¹² American Community Survey (ACS), 2020 5-Year, Table DP04

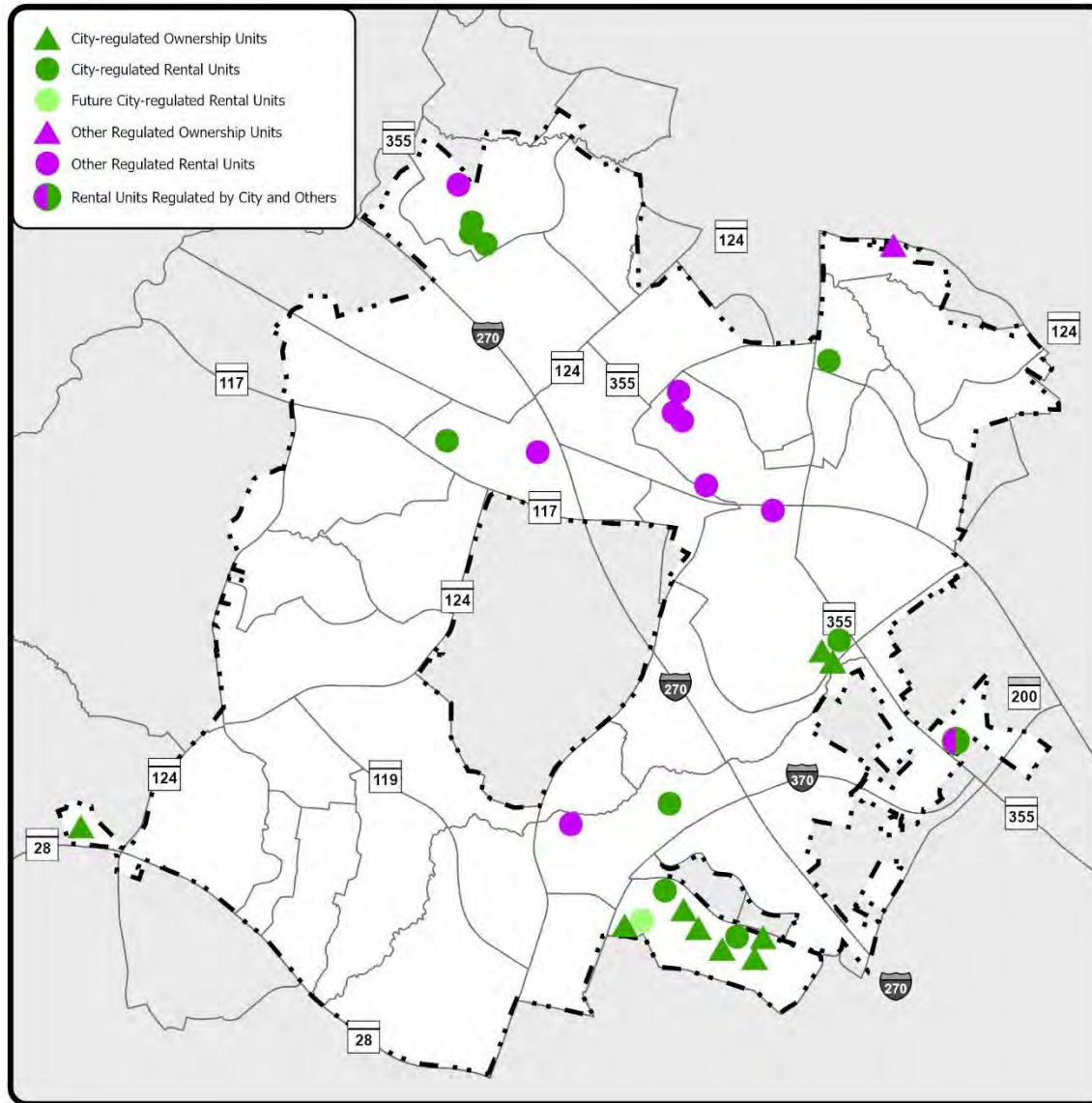
organizations. In addition to these, there are also market-rate affordable units, which are naturally lower-priced due to their age, location, and other characteristics, such as unit type and amenities available. The maps below show the location of market-priced affordable and income-restricted units in the City. As seen in the following maps, the majority (63.6%) of existing City-regulated income-restricted housing units are located on the east side of the City, and the majority (59.5%) of the 5,268 market-rate affordable units are also located east of I-270. Market-rate affordable units are complexes where over 75% of the 2-bedroom units are affordable to those making 80% of the City’s 2020 median household income.



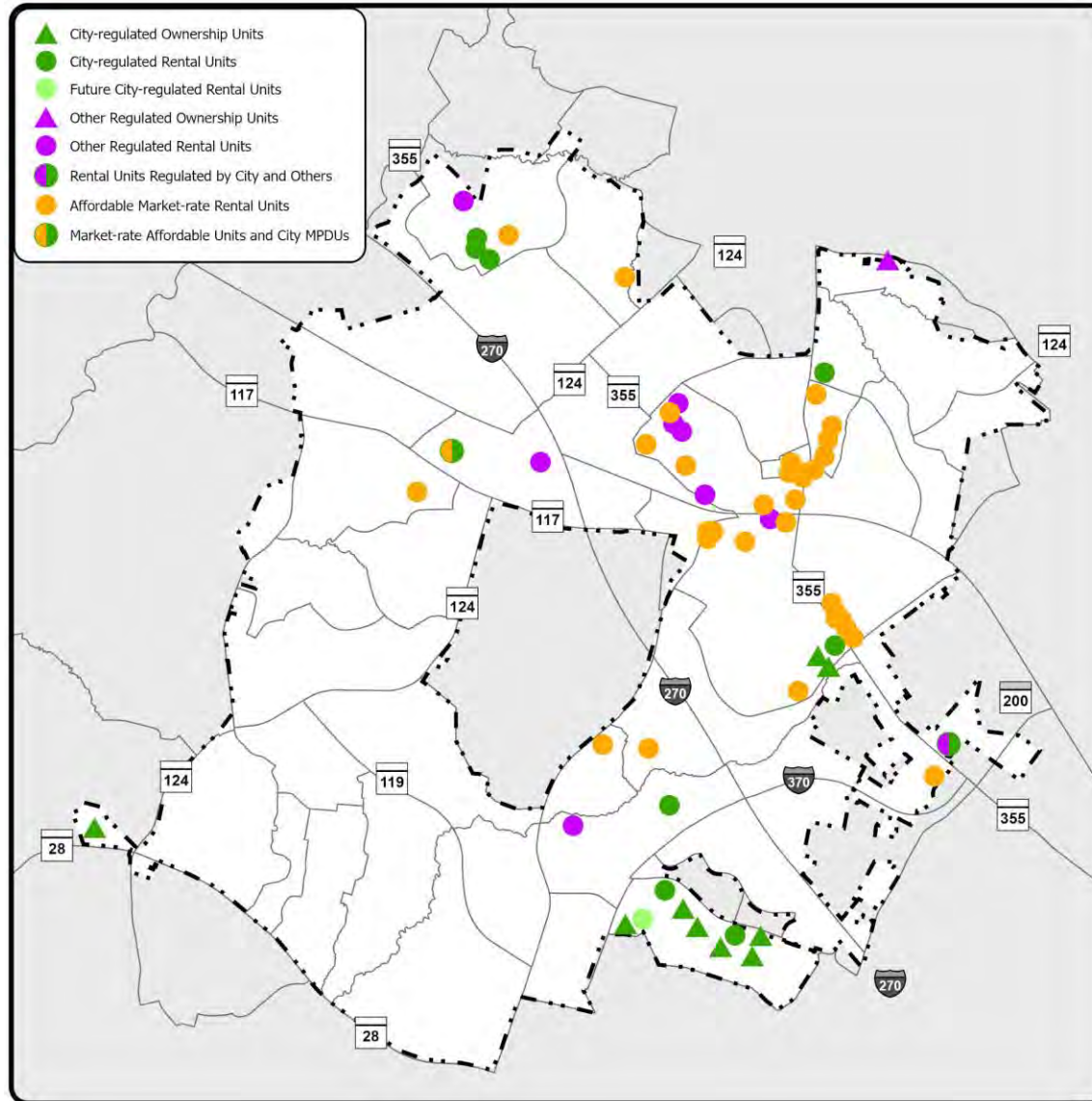
Non-Profit Affordable Housing



Map 10. Market-Rate Affordable Rental Housing Units



Map 11. Income-Restricted Housing Units



Map 12. All Market-rate Affordable and Income-Restricted Housing Units

Analysis was performed using income data from the American Community Survey and housing price data from CoStar and the State Department of Assessments and Taxation (SDAT) to estimate the affordability gap for City residents. The graphic below shows the number of households at various income levels and how many housing units are affordable to them. Staff used industry standards of 2.5 times one's annual income for ownership affordability and 30% of annual income for rental affordability. The last row shows the gap or oversupply of affordable housing units for each income cohort. For example, there are 6,045 households making between \$40,000 and \$80,000. There are 1,387 ownership units and 7,624 rental units affordable to these households. Subtracting the number of households from the total number of

affordable units at this income level results in an over-supply 2,966 units. These gaps and overages are based on what would be affordable to every household, not what every household is actually paying. In other words, households making \$20,000-\$40,000 are most likely spending a higher proportion of their income on housing and occupying housing units that are considered affordable to households making \$40,000-\$80,000. The chart shows that there are housing supply gaps for those making less than \$40,000 and for those making between \$80,000 and \$120,000. There are oversupplies of housing at the higher income levels and for the \$40,000 to \$80,000 level; however, the majority of supply at this income level consists of rental apartments.

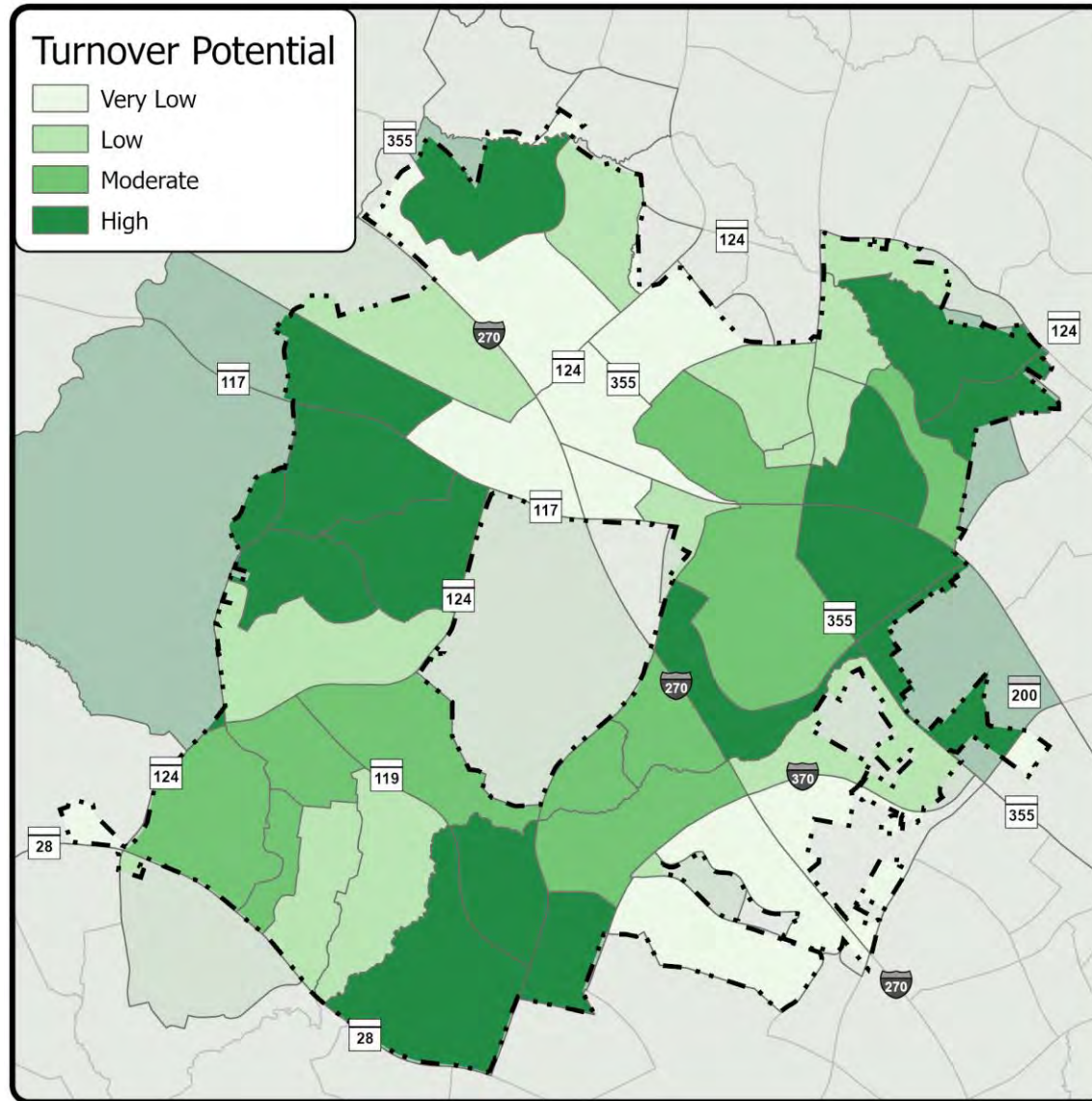
		2020 HUD Median Income: \$126,000 2020 City Median Household Income: \$91,845						
Income	Up to \$20,000	\$20,000 - <\$40,000	\$40,000 - <\$80,000	\$80,000 - <\$120,000	\$120,000 - <\$160,000	\$160,000 - <\$200,000	\$200,000 and Up	
Households	2,323	2,530	6,045	4,300	3,470	2,313	3,732	
Ownership Supply	15	503	1,387	1,962	4,909	2,666	5,339	
Apartment Supply	0	436	7,624	1,280	0	0	0	
Gap or Overage	2,308	1,591	2,966	1,058	1,439	353	1,607	

*Values estimated using 2020 ACS, Costar, and SDAT data

Having completed this analysis, further analysis was conducted examining the extent that the current for-sale housing inventory would enter the market over the 10 year lifespan of the Element and potentially address gaps for ownership. The analysis included several factors that individually may contribute to housing turnover in the future and assumed that two in particular were strong indicators. The first is the proportion of units that actually sold from 2010 to 2019 according to SDAT, with the assumption that a higher proportion of sales corresponds to fewer units being up for sale in the next ten years. A separate analysis of SDAT sales showed that the average time between sales for units that sold in 2010 and later was 9 years, which suggests that looking at the sales from 2010-2019 is a good indicator of the likely number of future sales over the next 10 years. The second factor is the proportion of existing owners that are 65 years old or older according to the 2020 5-year ACS, with the assumption that a higher proportion of senior owners corresponds to a higher likelihood of turnover in the future, as the

older homeowners retire, downsize, move out of the area, or pass away. A value of 1 to 4 was assigned to each of the two factors, with 1 representing “very low” probability and 4 representing “very high” probability, and then added the individual factors to create an overall turnover probability for each Census block group within the City.

While this analysis cannot definitively state the actual future numbers or locations of existing housing that will be on the market for sale, the following map reflects the analysis’s findings. High-potential turnover areas with a lower median sales price will likely provide more opportunities to reduce the affordability gap than areas with high median sale prices. The predominant unit type per block group indicates the most likely type of housing unit that will be available in a given turnover area.



Map 13. Potential Future Turnover of For-sale Housing Units

Key Points

- The City has an even split between renters and owners, so strategies for closing the affordability gap should consider the needs of both.
- The majority of housing affordable to households making less than \$120,000 is rental apartments. Strategies to expand ownership options for these lower income groups should be considered.
- There is a significant shortage of units affordable to households making less than \$40,000 a year. As housing options for those households are very limited, alternative options for assisting these households in boosting their wealth potential should be considered.
- Aging housing stock can provide affordable housing; however, attention must be paid to the lifespan of these units. Strategies should balance maintenance of these units with the provision of new units.
- Only 7% of the City's apartment units are three-bedroom units, yet these units have the lowest vacancy rate. Strategies should consider adjusting the supply of larger units to meet demand and provide for larger family households.
- The majority of the City's price-controlled units are located east of I-270. Strategies should include ways to re-balance the City's affordable units to provide options throughout the City and avoid concentrations of higher or lower income households.

3.5 Residential Pipeline

The City has approved several residential development projects that have not yet started construction, but are likely to be completed within the next 15-20 years. These development projects are referred to as the “residential pipeline” and are summarized in the tables below, which organize the pipeline projects into near-term (within the next 5 years), mid-term (within the Housing Element's 10-year time frame), and long-term (beyond 10 years). An additional column indicates the likelihood (low, moderate, or high) of the project being fully constructed within the given time frame.

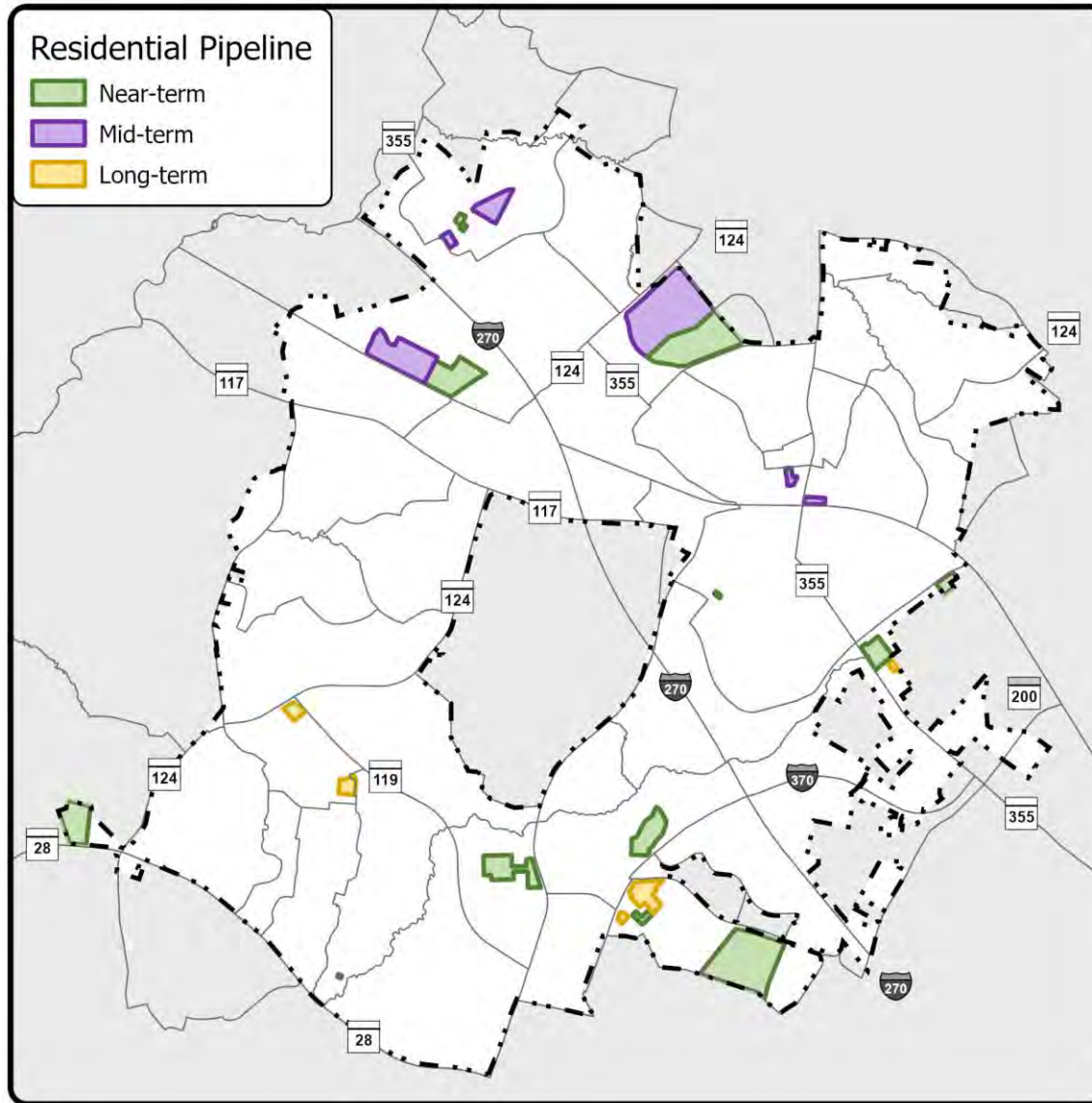
Near-term Pipeline Development			Dwelling Units by Type								
Development Project	Time Frame	Likelihood	SFD	TH	2-over-2 Condos	Garden Apt	High Rise Apt	Garden Condo	High Rise Condo	Group Quarters	Total Units
Brown's Addition (221 Cedar)	Near-term	High	1	0	0	0	0	0	0	0	1
Chase at Quince Orchard	Near-term	High	26	80	0	0	0	0	0	0	106
Crown	Near-term	High	43	275	80	0	630	0	0	0	1,028
Lakelands urban cottages	Near-term	High	0	0	0	1	0	0	0	0	1
Oakmont lots	Near-term	High	5	0	0	0	0	0	0	0	5
Washingtonian North/Carnegie Senior	Near-term	High	0	0	0	0	287	0	0	23	310
Central Ave project	Near-term	High	-3	0	72	0	0	0	0	0	72
Lakeforest Mall	Near-term	High	0	80	200	0	260	0	0	0	540
NIKE Site	Near-term	High	0	0	0	0	380	0	0	0	380
Spectrum - Paramount North	Near-term	High	0	0	0	0	230	0	0	0	230
WMTC - Metrogrove	Near-term	High	0	219	68	0	0	0	0	0	287
Total			75 (72 net)	654	420	1	1,787	0	0	23	2,963 (2,960 net)

Mid-term Pipeline Development			Dwelling Units by Type								
Development Project	Time Frame	Likelihood	SFD	TH	2-over-2 Condos	Garden Apt	High Rise Apt	Garden Condo	High Rise Condo	Group Quarters	Total Units
Fishman Site	Mid-term	Moderate	0	0	0	0	109	0	0	0	109
KIMCO Travis Ave	Mid-term	High	0	0	0	0	580	0	0	0	580
Lakeforest Mall	Mid-term	High	0	80	240	0	590	150	0	0	1,060
Park Ave Redevelopment	Mid-term	Moderate	0	0	0	80	100	0	0	0	180
Spectrum - Age-restricted Residential	Mid-term	Moderate	0	0	0	0	158	0	0	0	158
WMTC - Residential Town Center	Mid-term	Moderate	0	37	0	0	317	0	0	0	354
Total			0	117	240	80	1,854	150	0	0	2,441

Long-term Pipeline Development			Dwelling Units by Type								
Development Project	Time Frame	Likelihood	SFD	TH	2-over-2 Condos	Garden Apt	High Rise Apt	Garden Condo	High Rise Condo	Group Quarters	Total Units
Crown - unbuilt Residential	Long-term	Low	0	0	0	49	0	0	0	0	49
KIMCO Market Square Phase 1	Long-term	Moderate	0	0	0	0	245	0	0	0	245
Rashidian Estates	Long-term	Low	3	0	0	0	0	0	0	0	3
Kentlands Apts Phases 1 & 2	Long-term	Low	0	0	0	0	365	0	0	0	365
Total			3	0	0	49	610	0	0	0	662

Key Points

- Most of the residential pipeline is multifamily rental apartments (72.3%), including most of the near-term pipeline (60.4%)
- Only 27.4% of the pipeline provides ownership opportunities
- The majority of the pipeline (60.5%) is west of I-270
- Of the 3,906 pipeline units not currently under construction and subject the City's affordable housing program, only 589 new affordable units will be created, with 316 east of I-270 (53.7%) and 273 west of I-270 (46.3%).



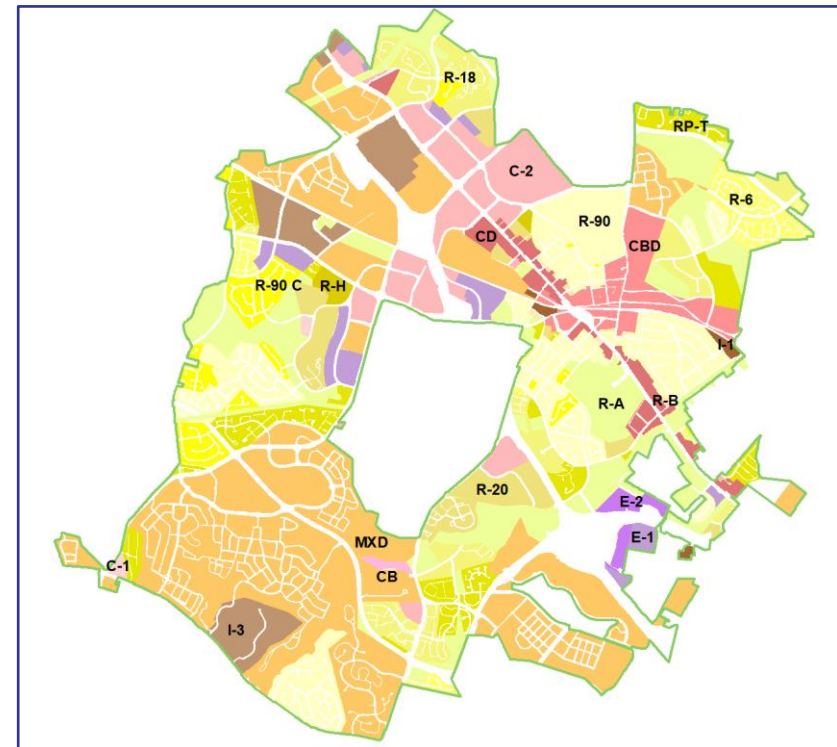
Map 14. Residential Pipeline Development

4. Planning and Zoning

4.1 Introduction

One set of tools the City can use to address housing needs are zoning requirements and long range planning initiatives. Regulatory changes and land use studies can facilitate the creation of new, innovative housing stock where needed and help ensure existing stock remains resilient. As discussed in the Existing Housing Stock section, almost all of the City's housing is either multi-family, single-family detached, or townhouses, with 51% being multi-family. Given the City's diverse population, a wide range of housing options should be considered. As seen in the City's affordability gap analysis, the majority of housing stock available to those at lower income levels are multi-family rental units. There exists an opportunity to encourage the provision of more diverse housing types, such as 2-over-2 condos and triplexes (referred to as "Gap Housing"), and different shared ownership options, such as co-ops, that may help fill the affordability gap and provide a lower-priced ownership option.

Only 18% of the City's total housing stock is made up of single-family detached units; however, there remains a strong preference for single-family detached housing in the surveys staff conducted during the public outreach initiative for this Element. Additionally, as seen in the map on page 25, some older, established neighborhoods in the City provide lower-priced detached housing



City Zoning

options. For these reasons, it is important to preserve the detached neighborhoods the City has today. Other options for enhancing the affordability of these neighborhoods may include financial assistance as discussed in the next section, Policies and Programs.

While not necessarily an ownership option, another option for expanding the City's affordable housing stock is to allow accessory dwelling units (ADUs). ADUs may serve multiple purposes: (1) they may provide an affordable rental option in an established single-family neighborhood; (2) they may be a source of income to homeowners, enabling them to better afford their mortgage; (3) they may assist in diversifying neighborhoods, and (4) with the City's aging population, they may provide housing for aging relatives of the homeowner. It is important to continue to study the demand for these types of units and ownership regimes and examine City regulations, processes, and policies for opportunities to encourage their development where appropriate.



Stacked Townhouses (also called 2-over-2 condos), a form of Gap Housing

In trying to meet future housing demand, the City should consider where new residential development is most appropriate. Future residential development opportunities will be limited to infill and redevelopment of underutilized sites, as the City is mostly built-out. Some potential redevelopment areas may better serve City residents if they were to remain employment centers, while others may be more appropriate to transition to mixed-use or residential. As noted in the Socio-Economic Data section, the housing affordability gap cannot be solved solely through a focus on financial assistance and the physical housing stock. The City must also take into account the types of jobs available (salary growth) to and held by City residents as a way to boost our residents' overall wealth. Maintaining existing employment nodes with adequate infrastructure will enhance the desirability of the City as a jobs center. When residential redevelopment is appropriate, attention should be paid to access to transit and amenities such as green space, as well as proximity to employment and necessary goods and services. A balanced mix of units and unit sizes should be provided that reflect the range of household sizes and incomes present in the City. These attributes enhance the livability of communities, contributing to their stability and a higher quality of life for their residents.

Planning and zoning actions for addressing housing needs should not focus solely on the provision of new housing stock, but should also consider ways to maintain and/or enhance the livability and affordability of existing developments and neighborhoods. The neighborhood turnover analysis predicted which existing developments may enter the for-sale market in the near future. Some of these areas have the potential to help address the affordability gap. The City should consider ways to ensure these neighborhoods remain resilient and have the necessary infrastructure to support their residents.

The recommendations in this section are divided into two goals. The first goal relates to the City's housing inventory and includes actions intended to facilitate a balanced housing stock that meets the needs of the City residents both in terms of affordability and desired unit type. The second goal relates to community resilience and includes actions intended to ensure existing and future

communities and their residents have the resources needed to be successful and maintain their desirability. Taken together, these goals and recommendations provide a framework for further research and study and establish policies to help guide future land use decisions and potential regulatory changes.

4.2 Recommendations

Goal 1: Promote or create opportunities for a variety of housing types for current and future City residents of all income levels with costs that reflect the range of incomes.

- Continue to track trends in housing supply and demand over time through surveys or studies to determine if the City should prioritize particular housing types.
 - Track when regulated affordable units' control periods end and the impacts on the City's affordable and market rate inventory turn-over in the City to anticipate changing demands for various housing types, City programs and services, school enrollment, and commute patterns.
 - Study underutilized commercial sites, where appropriate, along transportation corridors such as MD 355 for potential residential conversions or infill redevelopments.
 - Study regulatory options for co-housing, co-ops, or other shared ownership structures.
- The City's approval of multi-family rental projects should reflect unit sizes that are consistent with data-supported renters' household size needs.
 - Establish targets for housing unit type mix in future residential development projects where appropriate to maintain a balanced housing stock. Applicability of these requirements should take into account development size, surrounding context, and site constraints. Possible requirements may include limits on single-family detached construction and a minimum percentage of Gap Housing units, such as was done in the Lakeforest Mall Master Plan.
 - Perform ongoing reviews of land use zoning, regulations, and processes for barriers or obstacles to producing diverse housing or to incentivize the types of units either not being built and in short supply relative to demand.
 - Study and potentially allow ADUs in specific single-family areas.

Goal 2: Plan for amenities and infrastructure so that existing neighborhoods can remain resilient and new housing is sited in neighborhoods with a community identity

- Foster a climate of full participation in cultural and civic life; ensure City events and outreach for events cater to all demographic groups.
 - Research expanding site development notification requirements to renters as well as owners.
 - Promote mixed-income communities in the Land Use Element and zoning revisions.
 - Encourage development proximate to future and existing transit hubs and employment nodes.
 - Assess neighborhood infrastructure and support needs (i.e. parks and open space, schools, multi-modal transportation options, shopping, etc.) through data analysis, public input, and surveying existing walkable neighborhood amenities and infrastructure.
- Key Points:**
- Allowing innovation in housing by (1) removing regulatory barriers to new housing types/ownership structures and (2) facilitating adaptive reuse of existing aging buildings may help ease the affordability gap.
 - Monitor the locations and types of infrastructure improvements planned to ensure they are balanced and address equity disparities throughout the City while reflecting the prioritized needs established through data or policies.
 - Consider incentives for the adaptive reuse of aging commercial buildings to residential that incorporate green areas, outdoor gathering or recreational areas, have bicycle and pedestrian connectivity facilities, and be proximate to locations for basic goods, services, and transit.
 - Establish a 2035 Jobs to Housing Ratio goal of 2:1 with the intent that the majority of the City jobs reflect various career and salary levels that support home ownership.
 - Define the following as “City employment nodes”: areas that support a concentration of employment uses that reflect the sectors and salaries ranges desired by the City, and will contribute to achieving the City’s 2035 Jobs to Housing Ratio goal. Residential developments should leverage and be proximate to these nodes, but not incorporated in them.
 - Addressing housing needs should consider more than just the physical dwelling unit, but should also consider neighborhood infrastructure and amenities as well as proximity to and accessibility of employment and basic goods and services. These factors impact residents’ quality of life and financial stability.



Map 15. Employment Nodes

5. City Programs and Policies

5.1 Introduction

The City's experience with affordable housing programs will help it address the needs identified in this Housing Element. These housing programs are supported by local and federal funds, land use tools, and staff to provide a range of connective services. They include the Gaithersburg Homebuyer Loan Assistance Program (GHALP), the Moderately Priced Dwelling Unit (MPDU), and Work Force Housing Unit (WFHU) programs, and the Emergency Assistance (EA) program.

In concert, these City housing programs are designed for Gaithersburg residents with low and moderate incomes. These programs achieve the following:

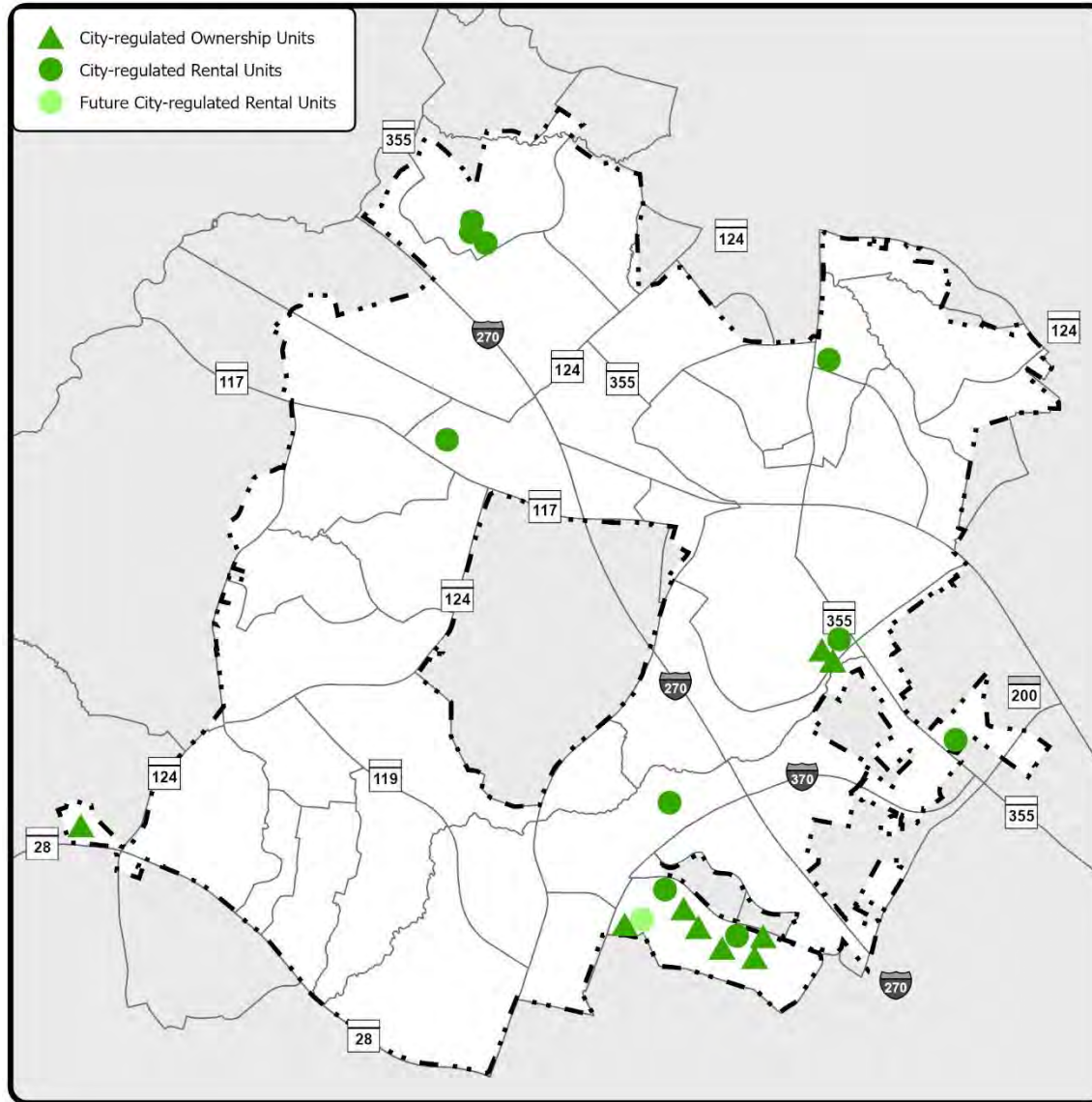
- Increase the number of first-time homeowners throughout the City's corporate limits.

- Expand the inventory of affordable rental and for-sale homes¹³.
- Prevent evictions for renters who are at risk of becoming homeless or displaced.

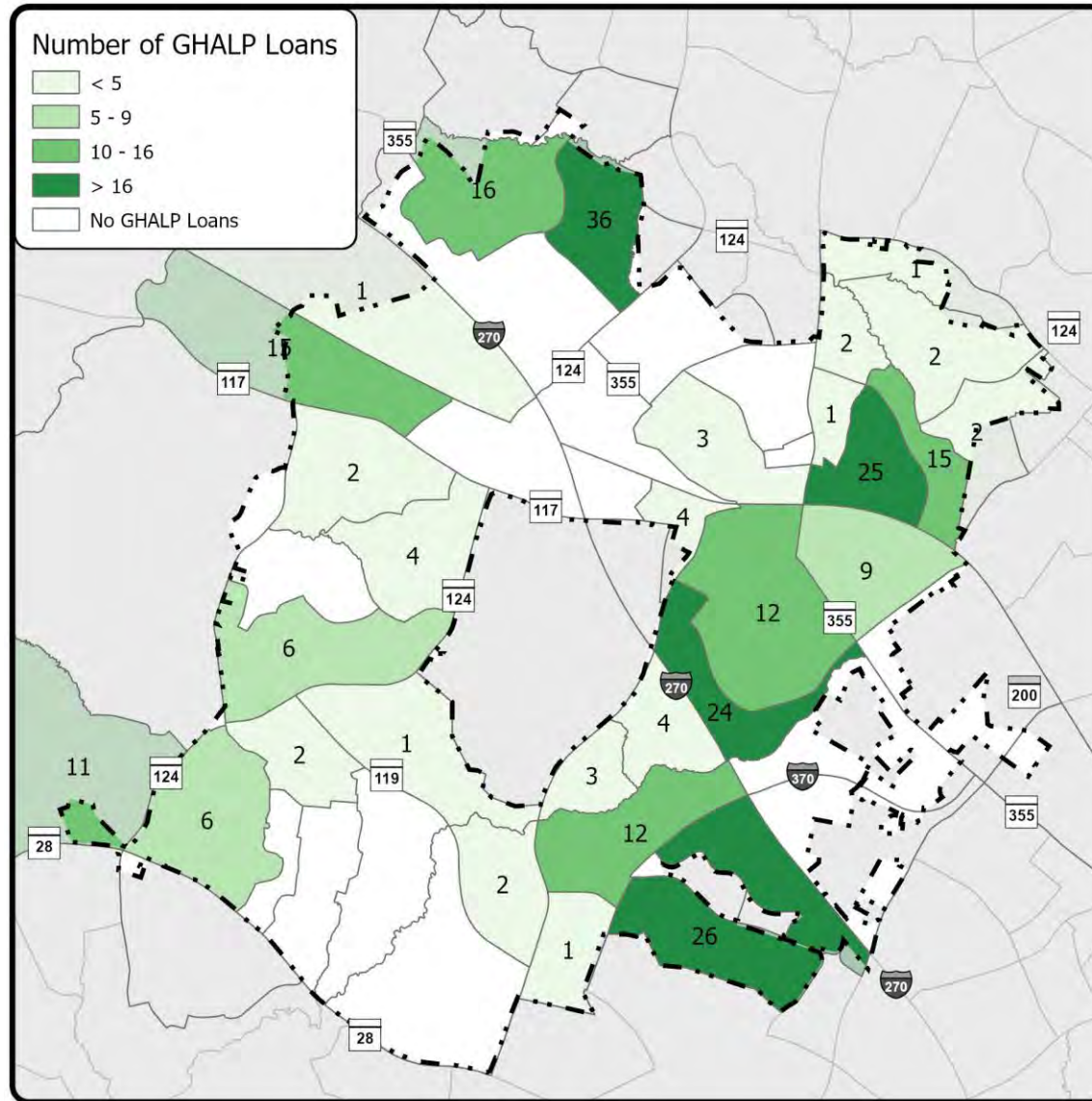
Since their inception, these programs have assisted over 1,000 Gaithersburg residents. The maps below show the number and location of units that are subject to the City's MPDU and WFHU programs (Map 15) and the location of GHALP loans (Map 16) that were issued by the City from 2013 to 2020.

¹³ "Affordable rental and for-sale homes" are both income and price restricted. This means that families obtaining the homes or apartments must have incomes at or below certain levels. The associated prices and rents are also calibrated, or

set to be affordable to households at those income levels. Both incomes and prices and rents are adjusted annually.



Map 16. Affordable Units in the MPDU and WFHU Programs



Map 17. GHALP Loans Issued 2013-2020

Despite the impact of these City programs, recent data shows a persistent gap of affordable housing availability, especially for low- and moderate-income households:

- One in four Gaithersburg households earns \$50,000 or less a year. At that income level, median-priced rental and ownership of homes are unaffordable. The resulting gap for the current City of Gaithersburg households earning less than \$40,000 a year is 3,899 homes.
- Another identified gap is for moderate-income households, earning between \$80,000 a year and \$120,000 a year. The resulting gap for current households in this income range is 1,058 homes.

In addition to the housing gaps shown above, many Gaithersburg households have high housing cost burdens. As mentioned previously, this means that they spend a larger proportion of their incomes on housing, leaving less money for other expenses such as food, child and health care, transportation, and more.¹⁴

- Half (50%) of all Gaithersburg renters spend more than 30% of their incomes on rent and utilities, and;

¹⁴The U.S. Department of Housing and Urban Development (HUD) defines cost-burdened families as those “who pay more than 30 percent of their income for housing” and “may have difficulty affording necessities such as food, clothing, transportation, and medical care.” “Severe cost-burdened families pay more than 50 percent of their income for housing.”

- Almost one in three (30.8%) of all Gaithersburg homeowners spend more than 30% of their incomes on their mortgage and utilities.
- Nearly eighteen percent (17.63%) of all Gaithersburg households are considered severely cost burdened, where housing costs are greater than 50% of household income.

Housing cost burdens are unequal across Gaithersburg households and disproportionately affect Black and Hispanic rather than Asian and White households.¹⁵

- One in four, or 25.4% of Hispanic households have a severe cost burden.
- More than one in five, or 22% of Black, Non-Hispanic households also have a severe cost burden.

As the City examines ways to increase economic opportunities and affordable housing accessibility, it is important to note the racial and ethnic disparities in homeownership. According to the MWCOG Regional Analysis of Impediments to Fair Housing/Fair Housing Plan (AI):

¹⁵ As mentioned previously and referenced later in the “Equity and Social Justice” section, and as seen in the MWCOG Regional Fair Housing Plan, cost burdens are highest for Black and Hispanic households.

- Black households are disproportionately more likely to rent (65.2%) compared with other households.
- White households are more likely to live in owner-occupied housing at a rate of over 65%.
- Hispanic households have a more balanced rate of renter (49.4%) and owner-occupied (50.6%) units.
- Asian American and Pacific Islander households have a higher percentage of owner-occupied units (66.6%).

The AI also found that the location of renters largely correlates with patterns of racial and ethnic segregation.

This Section of the Housing Element contains recommendations that address the challenges summarized above. These recommendations, in concert with the recommendations that address other parts of the City's housing challenges, attempt to address equity and socioeconomic issues in housing, expand affordable housing options throughout the City, and help more residents preserve or access affordable and safe housing. Several of the recommendations directly address the racial and accessibility disparities identified in this Housing Element and the regional AI mentioned above. If successful, these recommendations in tandem with the recommendations in the other two Housing Element sections, will help overcome patterns of segregation, disparities in housing needs and access to areas of opportunity, and truly integrated and balanced living patterns.

Furthermore, the City of Gaithersburg, as a recipient of federal housing funds, is required to affirmatively further fair housing through its housing and community development programs. As mentioned previously, the City is working with its neighboring jurisdictions from Maryland, Virginia, and the District of Columbia (DC) to complete a regional AI. A draft of the AI is currently (February 2023) under a 60-day public comment and will be completed by early summer of 2023. The City of Gaithersburg will also work with the State of Maryland's Department of Housing and Community Development (DHCD) to coordinate common efforts to affirmatively further fair housing.



Income Restricted Housing

The recommendations in this section are divided into three goals. The first goal addresses the preservation of existing affordable housing units and includes actions to identify rental and ownership housing in need of repair and provide resources for home repairs. The second goal addresses the expansion of accessible affordable housing units that allow residents to remain in their housing. This goal includes actions to prevent homelessness, evictions, and foreclosures, moderate-income ways to help people age in place or age in the community and enable persons with disabilities to live independently. This goal also includes actions to expand programs

to increase homeownership for low and moderate-income first-time homebuyers, with an emphasis on groups who have historically experienced greater barriers (primarily Black and Hispanic households). The third goal relates to the promotion of innovative and sustainable development to create housing options that the market does not currently produce to meet community needs. This goal includes actions to encourage the production of homes that are in relatively short supply or do not currently exist and that are both affordable and accessible, consistent with identified needs.

5.2 Recommendations

Goal 1: Preserve existing affordable homes (both market rate affordable and regulated affordable).

- Inspect and monitor the supply of existing affordable homes, including Moderately Priced Dwelling Units (MPDUs) and Workforce Dwelling Units (WFHUs)¹⁶. Inspections, of the properties and units, would occur as needed and concurrent with current City policies and practices. Monitoring of income and price-restricted homes would include their affordability period expirations, income levels and requirements, rents, and prices.
- The City's Neighborhood Services - Code Enforcement program identifies and inspects residential properties on a consistent basis. Staff inspections and enforcement of the City's

safety regulations provide a wealth of data to help identify housing in need of repair and upgrades to improve livability. This information could form the foundation to develop a menu of interventions to improve housing conditions. This could also serve as an incentive to use an array of financing resources to pay for needed repairs.

- Consider the development of an "early warning system" to identify properties, both rental and ownership, before they fall into disrepair and/or have their affordability requirements expire. An "early warning system" could also be used to identify areas of the City that have homes with concentrated code violations.
- Develop a housing preservation and rehabilitation program that includes incentives for existing rental property owners and

¹⁶ See Map 16 on Page 51 that shows the MPDUs and WFHUs

homeowners. Incentives would be designed to help owners repair their own homes as well as rental homes and apartments. The incentives would include repairs and property upgrades that address the occupant's health, safety, and overall home livability as well as upgrades to improve energy efficiency, access, and mobility to persons with disabilities and allow a household to age in place.

- Consider the use of City-provided grants or low or no-interest loans to owners of existing homes – both rental and ownership. Possible sources of funding could include the Community Development Block Grant (CDBG) and Housing Initiative Fund (HIF).
- Consider the use of tax incentives, such as abatements, to encourage owner repairs and property improvements that make the property more energy efficient and accessible. There are models of incentives such as tax abatements that reduce or waive taxes on the repair-added value (i.e. the additional value to the property that resulted from the improvements; that added value would not be taxed).
- Explore the creation of a Community Land Trust (CLT). Community land trusts are typically not-for-profit organizations created for the sole purpose of preserving affordable housing. CLTs preserve affordability by purchasing an existing property and covenanting permanent affordability (rents or sale prices).
- Coordinate with local nonprofit organizations to explore the creation of a Community Land Trust to provide permanent affordable housing to low- and moderate-income families. Permanent affordable housing should include units with

sufficient bedrooms, 3 or more, as well as in-house amenities to accommodate families with children and multigenerational households and accessible features to accommodate persons with disabilities.

- Provide preservation information utilizing the City's Communications & Public Engagement team and other outreach and engagement programs to improve program access. Information could also include programs and services offered by non-City of Gaithersburg sources, such as the State of Maryland, Montgomery County, and a wide range of non-profit organizations like Rebuilding Together, the Housing Initiative Partnership (HIP), and Habitat for Humanity.



Market-Rate Affordable Apartments

Goal 2: Help people remain in their housing and provide access to affordable homes.

- Continue Community Services' street outreach and engagement to identify homeless individuals; counseling, services, rental assistance, and mortgage assistance.
 - Work with Neighborhood Services and other local agencies, including police, sheriff, and courts on eviction processes to prevent or slow evictions.
 - Conduct a survey of renters and homeowners to identify barriers to housing called out in the MWCOG Analysis of Impediments to Fair Housing Plan / Fair Housing Plan (AI) and additional barriers such as Covid-19.
 - Provide information, services, and financial assistance (i.e. on economic literacy and renting and home buying processes). Utilize the City's Communications and Public Engagement Team to get information on services and financial assistance out to residents.
 - Provide outreach, engagement, and information to seniors on their options, including access to resources that allow them to age in place (i.e. financial and other resources). Several programs mentioned above, including home repair and upgrades, could be used to help seniors age in place.
- Provide information and consider technical assistance and funds to make home repairs and upgrades to make them more accessible (i.e. grab bars, exit ramps, roll-in showers, and other accessible enhancements). One potential source of funds for this purpose include the City's CDBG program.
 - The MPDU/WFHU program is another way to provide affordable housing to persons with disabilities. A portion of the affordable MPUDs/WFHUs units provided as part of a market rate development can be made accessible for persons with disabilities (the number of accessible units would be determined during the development review process)¹⁷.
 - Review and survey GHALP customers and other homebuyer assistance programs in the region (MWCOG members and the State of Maryland) to identify any barriers to lending. Consider GHALP programmatic changes to address any barriers and work with partner local governments if changes beyond Gaithersburg are needed (i.e. see Section 6 below that describes the City's efforts to ensure that this Housing Element fully addresses equity and racial and other forms of discrimination)
 - Consider ways to strengthen the City's GHALP program, including larger loans, increased outreach, and technical assistance.

¹⁷ The City is in the process of updating its Zoning Ordinance (ZO). This update may include recommendations that address accessibility in the MPDUs and WFHUs.

- Explore other sources of funds to be combined with the City's GHALP program (i.e. Montgomery County, State of Maryland, and private sources including large lenders and credit unions).
- Strengthen and expand the network of partner agencies to help renters and owners. Provide information, services, and financial assistance (i.e. on economic literacy and renting and home buying processes). The City's new Financial Empowerment Center (FEC) offers an opportunity to connect renters and owners with services and information to obtain or maintain affordable rental and ownership housing.



- Provide information and counseling to Gaithersburg renters and make relevant referrals to services and resources. This would include, but not be limited to helping tenants access other rental

¹⁸ Priority populations are: "K-12 Montgomery County public & private school employees licensed by the State of Maryland, City of Gaithersburg full-time or permanent part-time employees, police officers, fire safety employees or veterans." Equity Emphasis/Focus Areas are: "Equity Emphasis Areas (EEAs)

assistance (i.e. HOC Housing Choice Vouchers and the City's Emergency Assistance (EA) funds). A component of the City providing short-term rental assistance is also looking at the longer-term efficacy of this program and developing stronger connections to City and other programs to foster sustainable independence for EA fund recipients.

- Help priority populations and people living in equity emphasis/focus areas¹⁸ obtain an affordable home in Gaithersburg (rental or ownership).

Goal 3: Identify, promote, and consider incentives that produce homes the market does not produce to meet community needs.

- Explore the use of the City's Housing Initiative Fund (HIF) to include no- or low-interest loans to developers in combination with the MPDU/WFHU program to incentivize the production of new affordable units. Currently, the City's GHALP program can be used for MPDU/WFHU purchasers.
- Consider creating a self-sustaining Gaithersburg Innovative Housing Trust Fund (GIHTF). This fund could be seeded by an initial HIF contribution and include other sources such as transfer fees and developer contributions and other potential revenue sources. The expectation is that trust fund dollars would leverage other sources of funding including Montgomery

are locations with high concentrations of low-income individuals and/or racial and ethnic minorities." MWCOG uses "Emphasis" and Montgomery County uses "Focus". Both concepts are similar.

County housing funds, State of Maryland funds, federal tax credits and loan and grant funds, and other private funds (i.e. corporate and foundation funds). The fund could be used to provide loans for long-term or short-term use. Short-term use would be financing for up to 5 years (i.e. taken out as a funded development obtains its permanent financing). Long-term use could be up to 30 years or more when used as part of the permanent financing package (private debt and potentially other long-term public debt).

- Consider providing City financial incentives such as HIF to developers to produce affordable homes. This could include lower rents at the 30% to 50% of AMI range. This range would serve households earning from approximately \$30,000 to \$80,000/year. As mentioned above, the City could provide HIF financing in combination with the MPDU/WFHU program to achieve deeper affordability/lower rents.
- Collaborate with organizations to optimize and/or leverage City affordable housing investments. These agencies would include Montgomery County DHCA, Housing Opportunity Commission (HOC), and non-profits like Montgomery Housing Partnership (MHP) to meet City housing goals and objectives. Collaboration with other funding sources like the Washington Housing Initiative – Impact Pool¹⁹ and Amazon’s Equity Fund²⁰ provide two private sector options.

- Advocate for the collaboration of local large Gaithersburg employers to develop ways to help their employees live closer to reduce their housing and transportation expenses.
- Identify opportunities for owners to redevelop, acquire, and/or complete upgrades of aging, underutilized or functionally obsolete properties. For example, these could be vacant properties along or near transit corridors, including the mixed-use Frederick Avenue corridor which may offer such opportunities adjacent to existing residential properties for potential residential use.
- Allocate City financing incentives on a competitive basis that rewards innovative building and overall development practices (i.e. such as creating net-zero, energy efficient homes).
- Explore best practices and innovative affordable housing options that have been completed elsewhere; consider adding one or more of these best practices to the City’s incentive review process (i.e. Request for Proposals (RFP) for its housing funds).
- Consider adjustments to the City’s MPDU/WFHU programs to produce the types of units in most demand/short supply. This would include a review of MPDU/WFHU program calibration – required percentages, incomes, rents, and, sale prices (i.e. MPDUs at lower rents such as at 30% to 50% AMI).
- Review the current affordability period of 30 years for rental MPDUs/WFHUs. Concerns have been raised that after the affordability period, rents could increase and displace tenants

¹⁹ <https://www.jbgsmith.com/about/washington-housing-initiative/impact-pool>

²⁰ <https://www.aboutamazon.com/impact/community/housing-equity>

at that time in the future. Neighboring jurisdictions are considering 99-year affordability periods.

- The MPDU/WFHU program is another way to provide affordable housing to seniors and persons with disabilities. Consider setting aside a portion of the affordable MPDUs/WFHUs units

Key Points

- Housing challenges are most acute for families with incomes below \$40,000 / year and they will require local, state, and federal resources to meet their housing needs. Households in this income category are also most likely to have high or severe housing cost burdens.
- The City will be most successful in meeting its residents' housing needs when it uses its resources – land use tools, financing programs, and services staff, in concert with other public and private sector partners.
- To strengthen its housing market, the City will need to preserve existing affordable homes, both subsidized and non-subsidized, and incentivize the production of more housing (both market rate and affordable housing).
- As the City is a recipient of federal housing funding, there will be concentrated efforts to work with neighboring jurisdictions and the MD Department of Housing and Community Development (DHCD) to affirmatively further fair housing.

6. Equity and Social Justice

6.1 Introduction

Equity and social justice advancement are at the forefront of current housing discussions as the nation has passed the 50-year mark since the adoption of the Fair Housing Act. Equity and social justice issues are complex in both their causes and solutions. Oftentimes, identifying and acknowledging the existence of problems is the first step to achieving solutions. While the Housing Element cannot fully resolve the root causes of inequity, it can identify actions that create a climate offering opportunity and a foundation to create generational wealth and economic security for communities of color. It can address structural barriers in the lending and real estate industries that prevent housing opportunities to people of color and it can establish goals to protect and address housing needs for our senior and disabled residents.

More than 80% of the City's housing inventory, both ownership and rental, was built after the adoption of the Fair Housing Act in 1970, so historic injustices such as redlining and restrictive covenants and their legacies are not as prevalent in the City as in other areas. However, racial equity issues existed during the historic development of Gaithersburg housing and still exist today. Many other older communities across the nation are grappling with the

equity impacts of being primarily historically zoned for single-family detached homes. Academic discussions and other jurisdictions are debating doing away with single-family zoning or allowing denser housing types in these detached neighborhoods as a possible way to expand lower-cost opportunities. Again, the City has advantages because only 18% of its housing inventory is single-family detached. However, while the City may have advantages, other



DiverseCity Showcase, celebrating the City's diverse population

issues do exist. Although the City is very diverse, household incomes reflect disparities by race, age, and disability. Overall median household income has not kept pace with the growth in housing costs, and this is amplified in these sub-populations. The data presented in this section highlights how differences in race, age, and disability correlate with disparities in income and greater challenges with obtaining adequate housing.

As noted in the Demographic section, the racial makeup of the City is diverse, with no single race forming a majority of the population. In 2020, the largest racial/ethnic group was White, not Hispanic, making up 32% of the City's population, followed by Hispanic at 29%, Asian at 19%, and Black at 16%. The White population has decreased since 2010, while the Black, Asian, and Hispanic populations have all increased.

Race and ethnicity are strongly correlated with income and housing cost burden. For many low-income families or households of color a house is more than just a shelter, it is their largest financial asset and the cornerstone to generational wealth. Stable, affordable housing, be it ownership or rental, is critical to breaking the cycle of poverty. Affordable, stable and safe housing leads improved health, better performance in school, greater economic opportunities, and increased community cohesion. Inadequate housing promotes the cycle of inequality, poverty, and poor quality of life.

The chart to the right²¹ shows that in the City, White, non-Hispanic residents have the highest median household income at just over \$116,000, while Hispanic residents have the lowest at just under

\$70,000.²² In short, City household incomes reflect disparities by race and ethnicity.

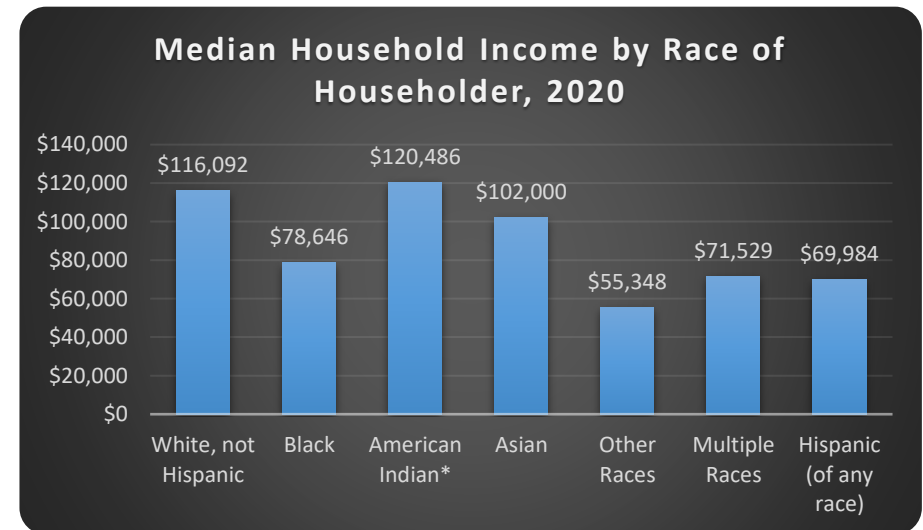


Chart 9. Income by Race

City residents also experience disparities in housing cost burden by race and ethnicity. A greater proportion of Hispanic and Black households experience cost-burden as seen in the table below. As discussed previously, cost-burdened households are those spending more than 30% of their household income on housing; severe cost-burdened households are those spending 50% or more of their household income on housing.²³

²¹ Some racial groups were not included as they make up a very small proportion of the City's population and as a result that data has a very high margin of error.

²² American Community Survey (ACS), 2020 5-Year

²³ Analysis of Impediments (AI) to Housing Draft Report (special Census tabulation)

City Households with Severe Cost Burden by Race, 2019

	Number of Households	Number with Severe Cost-Burden	Percent with Severe Cost-Burden
White, Non-Hispanic	10,945	1,735	15.85%
Black, Non-Hispanic	3,970	855	21.54%
Hispanic	4,050	1,030	25.43%
Asian or Pacific Islander, Non-Hispanic	4,235	485	11.45%
Native American, Non-Hispanic	34	4	11.76%
Other, Non-Hispanic	623	95	15.25%
Total	23,845	4,204	17.63%

In addition to examining disparities in income and housing cost burden by race, it is important to note the racial and ethnic disparities in homeownership. The MWCOC Regional Analysis of Impediments to Fair Housing/Fair Housing Plan (AI) analyzed this issue and noted the following patterns:

- Black households are disproportionately more likely to rent (65.2%) compared with other households.
- White households are more likely to live in owner-occupied housing at a rate of over 65%.

- Hispanic households have a more balanced rate of renter (49.4%) and owner-occupied (50.6%) units, which reflects the underlying housing supply split between renter and owner units.
- Asian American and Pacific Islander households have a higher percentage of owner-occupied units (66.6%).

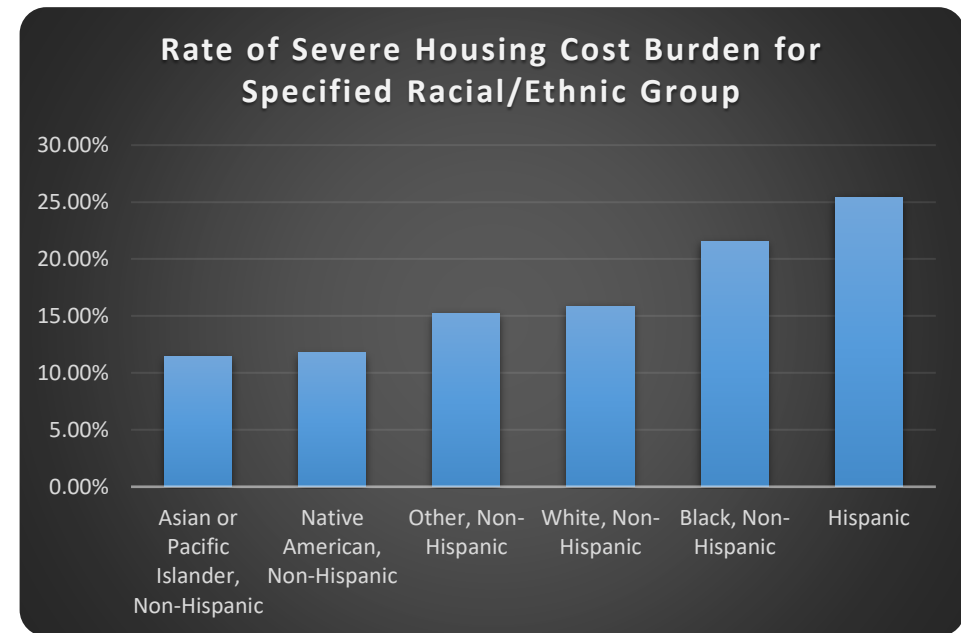


Chart 10. Housing Cost Burden by Race/Ethnic Group

The AI also found that the location of renters largely correlates with patterns of racial and ethnic segregation.

An examination of the 2020 5-year ACS shows a similar pattern of rental and ownership by race of householder, as demonstrated in the tables below.

Householder Race by Tenure, 2020 5-year ACS

Householder Race	Households	Renters	Owners
White, non-Hispanic	10,240	38.7%	61.3%
Black	3,951	65.5%	34.5%
Asian	5,278	42.7%	57.3%
Hispanic	4,602	64.5%	35.5%
American Indian/ Alaska Native	85	41.2%	58.8%
Native Hawaiian/ Pacific Islander	24	0.0%	100.0%
Other Race	1,749	75.5%	24.5%
Multiple Races	1,313	64.9%	35.1%
Total	24,713	49.4%	50.6%

Householder Race by Tenure, 2020 5-year ACS

Householder Race	% of all Households
White, non-Hispanic	41.4%
Black	16.0%
Asian	21.4%
Hispanic	18.6%
American Indian/Alaska Native	0.3%
Native Hawaiian/Pacific Islander	0.1%
Other Race	7.1%
Multiple Races	5.3%
Total	24,713

Householder Race of Renters, 2020 5-year ACS

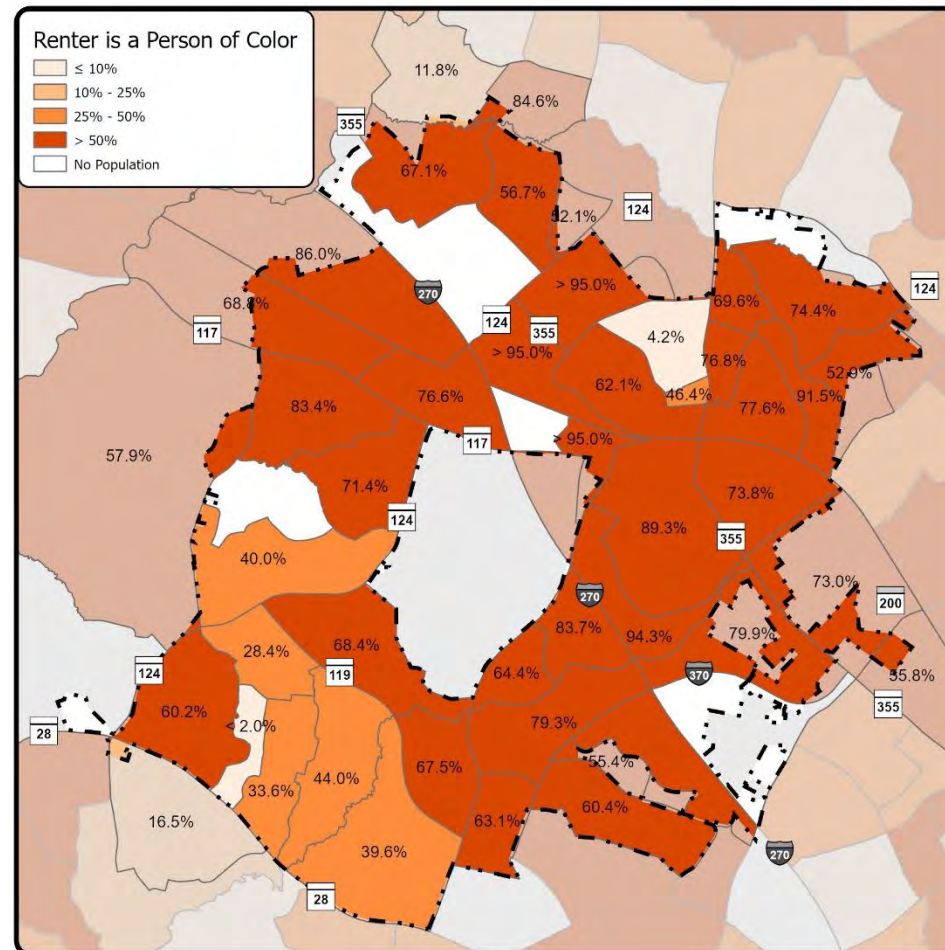
Householder Race	Renter Households	% of all Renters
White, non-Hispanic	3,964	32.5%
Black	2,589	21.2%
Asian	2,252	18.4%
Hispanic	2,970	24.3%
American Indian/Alaska Native	35	0.3%
Native Hawaiian/Pacific Islander	0	0.0%
Other Race	1,321	10.8%
Multiple Races	852	7.0%
Total	12,214	100.0%

Householder Race of Owners, 2020 5-year ACS

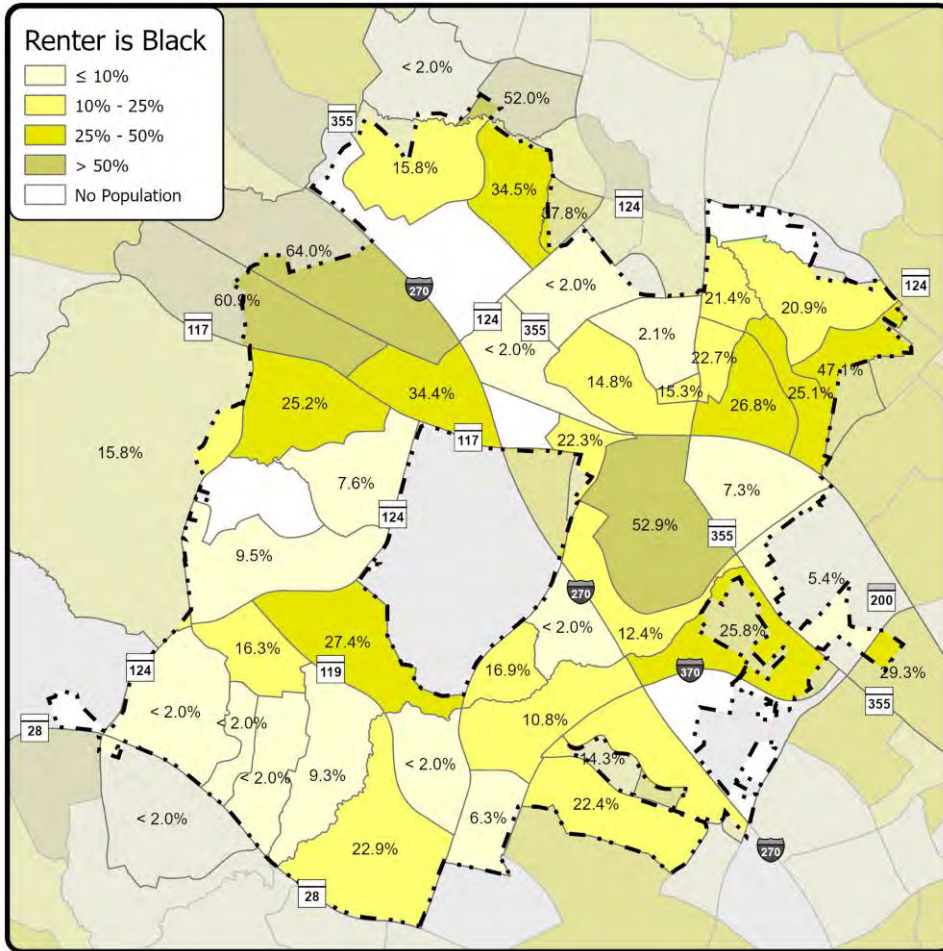
Householder Race	Owner Households	% of all Owners
White, non-Hispanic	6,276	50.2%
Black	1,362	10.9%
Asian	3,026	24.2%
Hispanic	1,632	13.1%
American Indian/Alaska Native	50	0.4%
Native Hawaiian/Pacific Islander	24	0.2%
Other Race	428	3.4%
Multiple Races	461	3.7%
Total	12,499	100.0%

The maps below show renters by race in the City and notes that Gaithersburg does have areas of concentration that are not respective to the overall population percentages. For example, while 18% of the City's overall population are Black, 21% of the

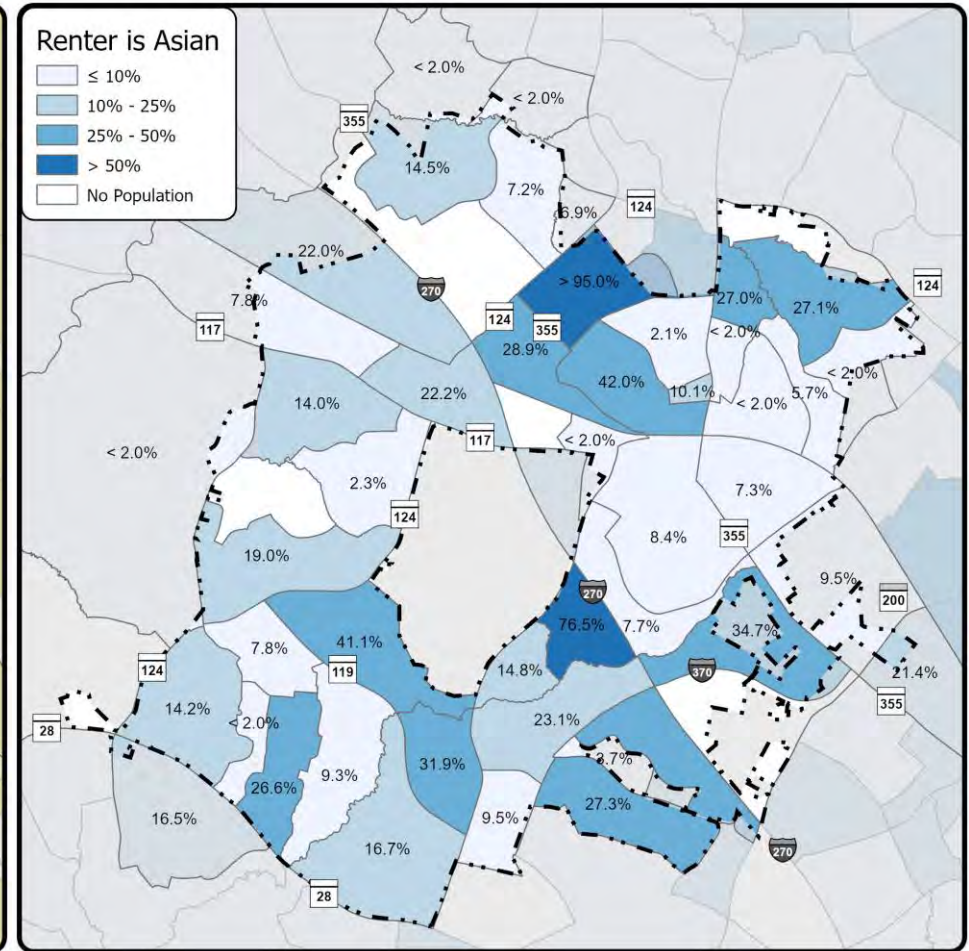
City's renter-occupied households are Black, and there are census block groups where over 25% and over 50% of the renter-occupied households are Black. All data shown on the maps are from the 2020 5-year ACS.



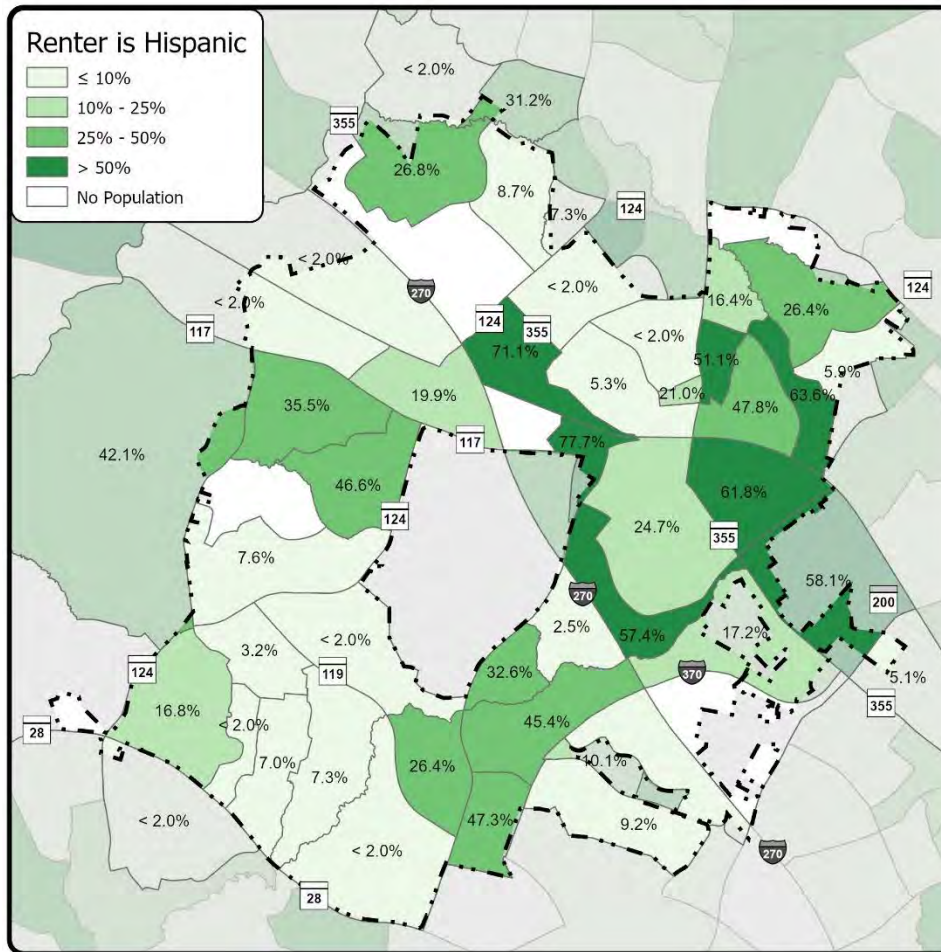
Map 18. Renter is a Person of Color



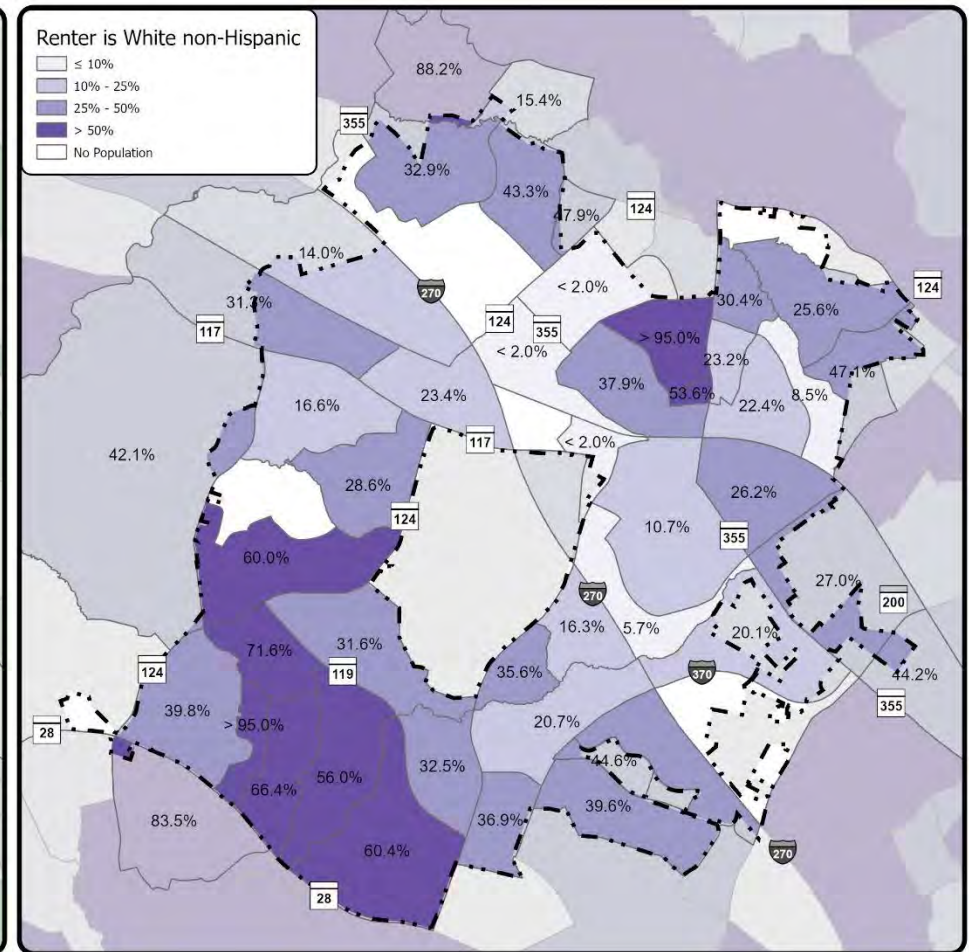
Map 19. Renter is Black



Map 20. Renter is Asian



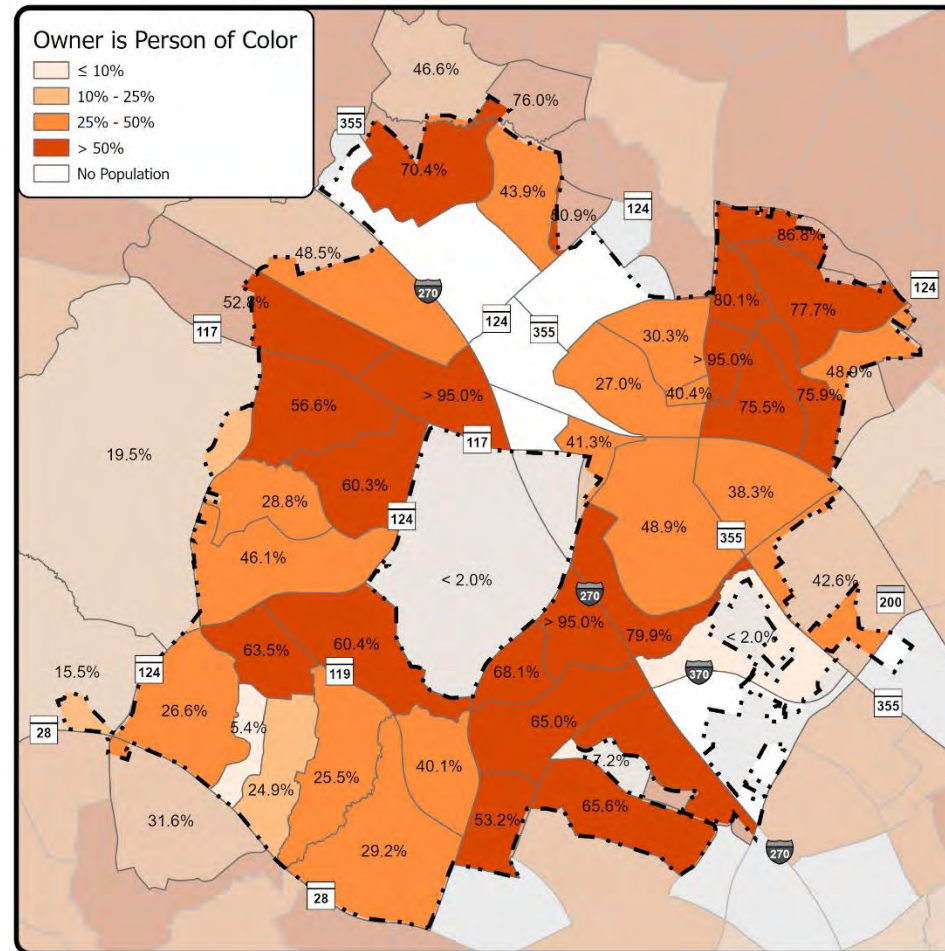
Map 21: Renter is Hispanic



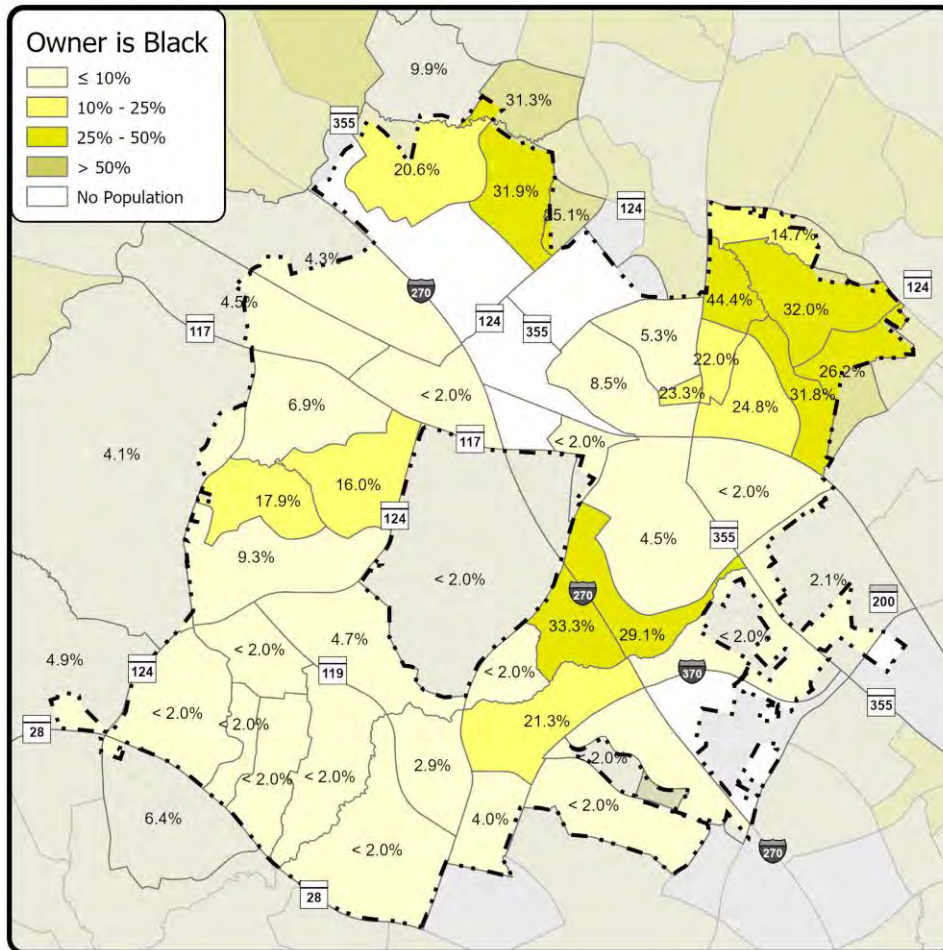
Map 22: Renter is White, non-Hispanic

The maps below show homeownership by race in the City and notes that Gaithersburg does have areas of concentration that are not respective to the overall population percentages. For example, while 18% of the City's overall population are Black, only 11% of

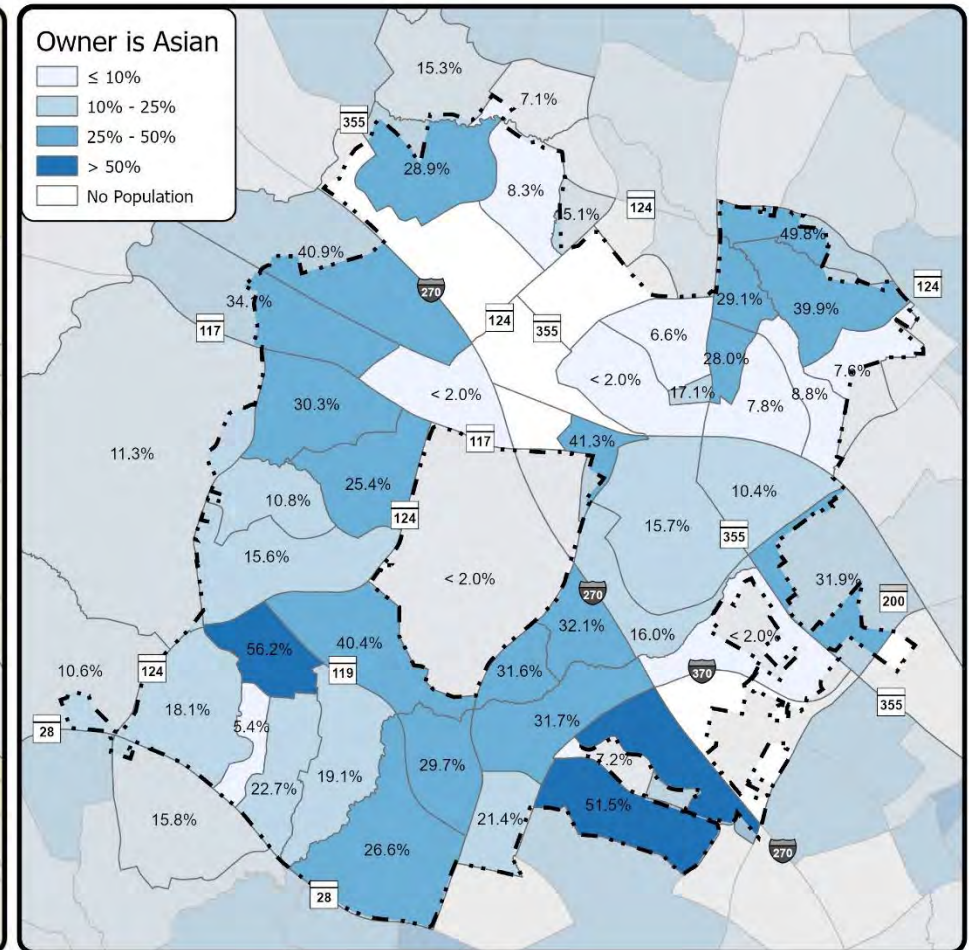
the City's owner-occupied households are Black, but there are census block groups where over 25% of the owner-occupied households are Black. All data shown on the maps are from the 2020 5-year ACS.



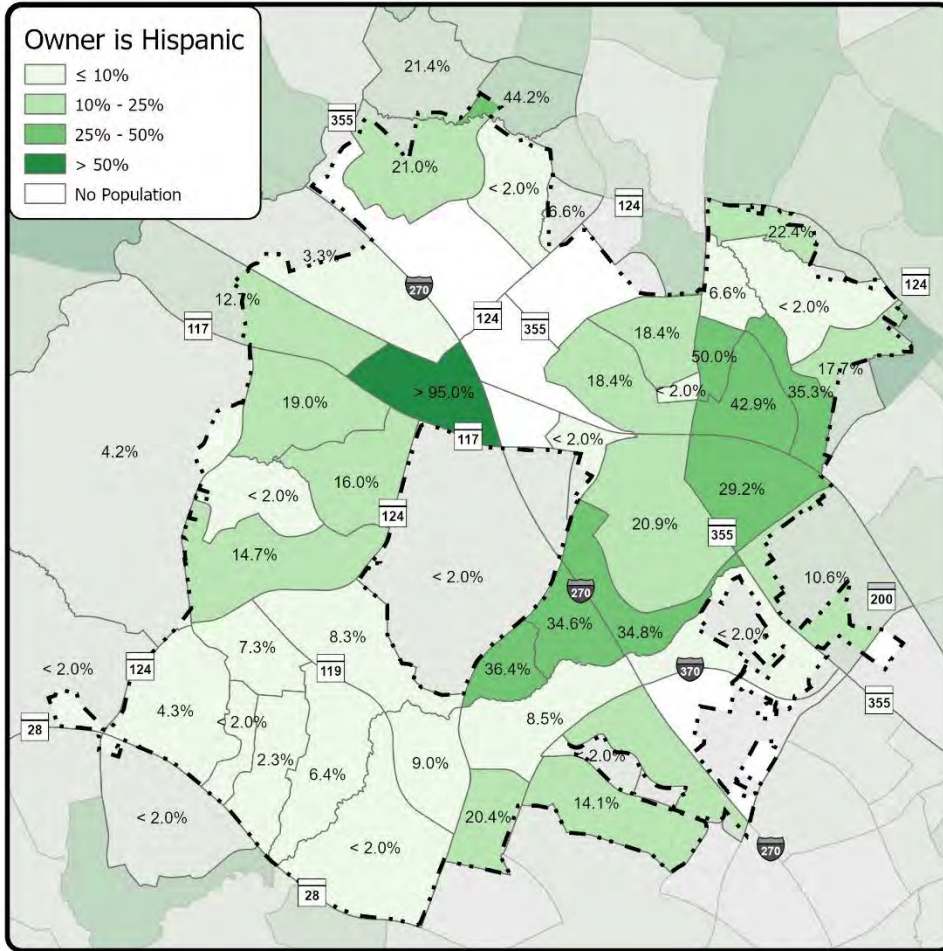
Map 23. Owner is a Person of Color



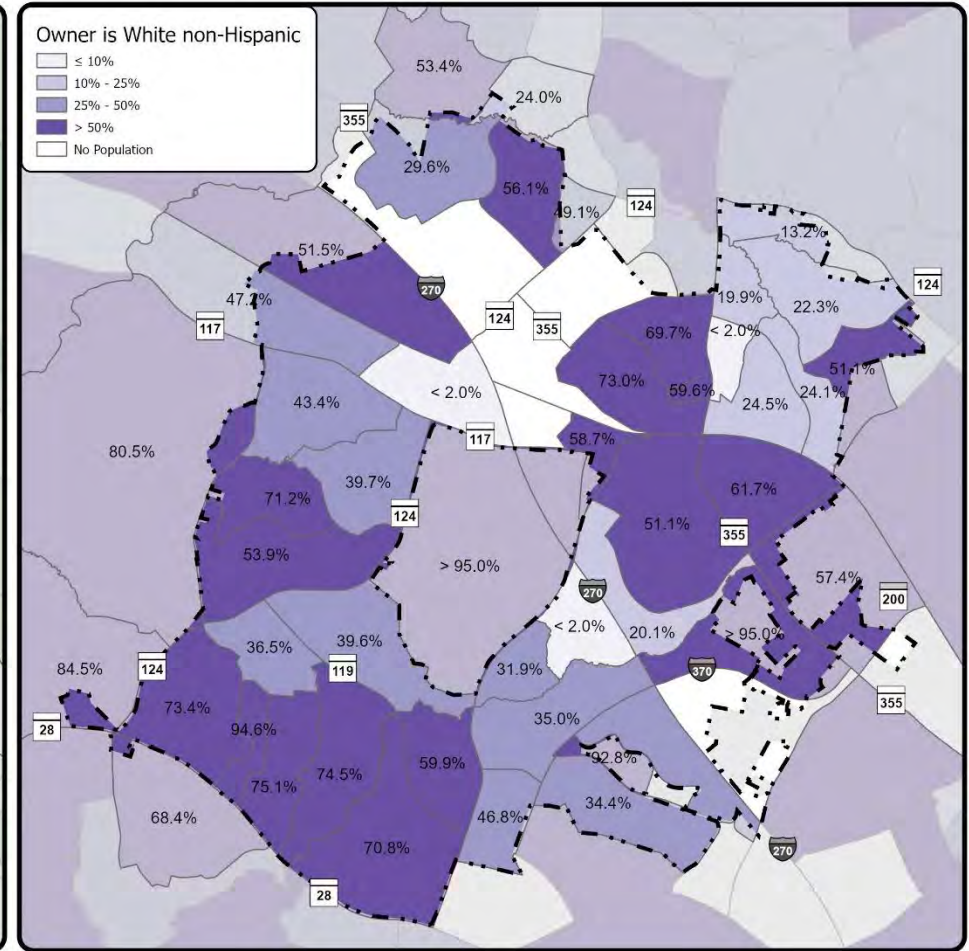
Map 24. Owner is Black



Map 25. Owner is Asian



Map 26: Owner is Hispanic



Map 27: Owner is White, non-Hispanic

Other population characteristics that may influence one’s income and ability to obtain adequate housing include English proficiency, education level, and access to the internet. As to be expected with the City’s diverse population, only half of the City’s population speak only English at home, and just over 20% speak English less than very well.²⁴

Language Spoken at Home, 2020

Speak only English at home	49.7%
Speak English less than very well	21.9%
Speak Spanish at home	21.4%
Speak Spanish at home & English less than very well	11.1%

There is a strong correlation between education level and income, as seen in the table below. City residents with a Bachelor’s degree earn over twice as much as those with no college experience.²⁵ The table also shows that females have lower median earnings than males, for all educational levels. However, this table does not consider certifications for trades, such as electricians, which may provide earnings comparable to those with college degrees.

Median Earnings by Educational Attainment, 2020

	All Persons	Male	Female
Less than high school graduate	\$27,091	\$31,902	\$20,500
High school graduate (includes equivalency)	\$29,180	\$31,908	\$23,930
Some college or associate's degree	\$38,353	\$44,110	\$33,790
Bachelor's degree	\$63,387	\$82,513	\$53,803
Graduate or professional degree	\$93,728	\$102,257	\$84,071

In response to the Covid-19 pandemic, remote learning, online applications, job interviews, and remote working have become more commonplace, and reliable, affordable, or no-cost internet access is key to allowing equitable access to these opportunities. One should not be denied opportunities for advancement because they do not have internet or are limited to phone plans. The map below shows households without a high-speed internet subscription. This data must be viewed with the understanding that some households may choose not to have a subscription even if they could afford it.

²⁴ American Community Survey, 2020 5-Year

²⁵ Ibid.

Age is another factor that can correlate with income and the ability to obtain and retain adequate housing. For retired families and individuals on a fixed income, equity in a home can provide financial stability. As noted previously, the City’s population is aging, as both the working age and youth populations have decreased since 2010 while the senior population has increased. The City’s elderly population aged 60+ make up 18.5% of the City, while householders aged 65+ comprise approximately 20% of the City’s homeowners, and 23% of all households have one or more members aged 65+.

Household income varies by age of householder, as seen in the chart to the left. Householders age 65 and over make 28% less than those aged 45 to 64 and have the second lowest household income after householders under 25 years of age.²⁶

Physical and cognitive disabilities is another population characteristic that can influence income and housing needs. As seen in Chart 12 on the following page, over 9% of the City’s population has a disability. This population shares many of the same housing issues and needs as the aging population, with approximately 25% of those aged 65+ having a disability. The first table below shows the percentage of the City’s population with a specific disability, and the second table to the right shows the disparities in earnings experienced by those with a disability. The disability that impacts the greatest proportion of individuals in the City is an independent living difficulty. As seen in the second table, those with a disability earn less than those without a disability.²⁷ Those with disabilities not only have a more difficult time affording housing in general, but may also experience challenges in finding housing that meets their specific accessibility needs.

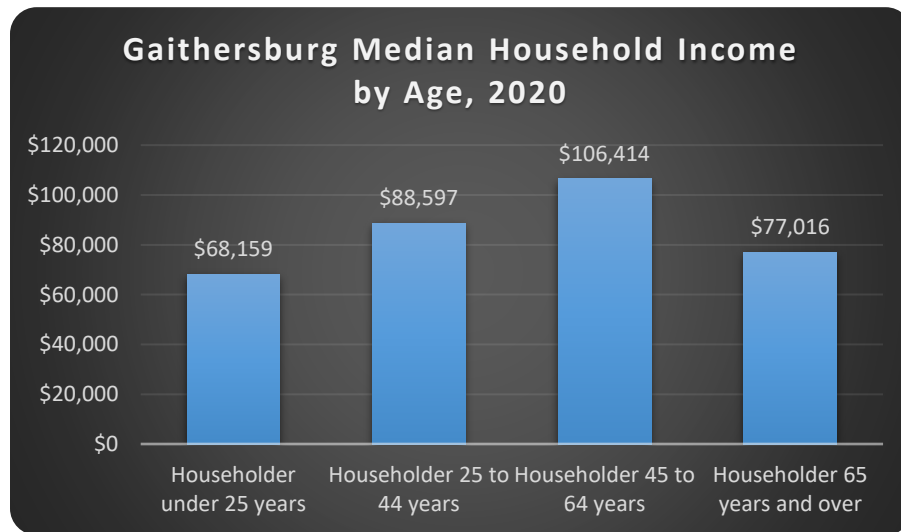


Chart 11. Median Household Income by Age

²⁶ American Community Survey (ACS), 2020 5-Year

²⁷ American Community Survey (ACS), 2020 5-Year

Type of Disability, 2020

With a hearing difficulty	2.0%
With a vision difficulty	1.9%
With a cognitive difficulty	4.3%
With an ambulatory difficulty	4.3%
With a self-care difficulty	1.8%
With an independent living difficulty	5.0%

Median Earnings by Disability Status, 2020

	With a Disability	Without a Disability
Males	\$41,175	\$50,749
Females	\$34,693	\$37,132

Percent of City Civilian Non-institutionalized Population with a Disability, 2020

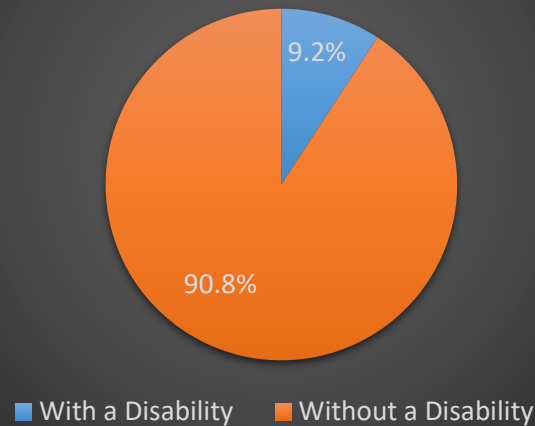


Chart 12. Population by Disability

The goals and recommendations in this section strive to eliminate race as a barrier to achieving wealth and obtaining adequate housing, focusing on aspects such as expanding educational opportunities and increasing wealth potential. This section will define actions the City may take directly, advocacy efforts, and potential partnerships with non-profits and other housing stakeholders that may help to overcome these opportunity hurdles.

Overcoming structural barriers, is more complex in that many of the issues, such as appraisal gaps, mortgage lending tools and practices, and racial steering are not always visibly transparent actions and are under the purview of federal agencies or industry groups. This section defines that the City’s role is to advocate for and work with various partners such as MWCOG, the State Delegation, National Association of Realtors, housing non-profits, and the lending community to encourage foundational change in operations and enhanced oversight and sensitivity when addressing persons of color or other disenfranchised communities.

The last goal and recommendations in this section concerns housing for seniors and those with disabilities. These populations share many of the same housing issues including physical design accessibility, ability to “live-in-place”, access to recreational amenities, social isolation, access to nutritious food options and medical facilities and having financial income limitations.

6.2 Recommendations

Goal 1: Advance City tools that create a foundation for opportunity and wealth creation.

- Consider the inclusion of day care and other social support uses in the review of residential developments and review any regulatory barriers to their inclusion.
- Support local minority and women-owned businesses; review the use and effectiveness of current economic development programs on these businesses.
- Continue to track the presence of food deserts and work towards ensuring equal access to nutritional meals.



Gaithersburg CARES Hub, provides food and health items to families in need

- Survey, and where unmet need is identified, develop and support culturally responsive education and counseling programs. Continue to support agency partners such as Montgomery County Public Schools in this effort.
- Support legal aid programs; continue to offer City grant funds to organizations providing legal aid.
- Foster an environment that grows residents' incomes and creates more jobs, including support for fully funding workforce development providers, trade schools, and training organizations. For small businesses, support access to business support organizations and flexible, low-cost capital to help them plan, start, and grow their operations.
- Direct job and career fairs to be hosted in high unemployment or low median income areas.
- Support English as a Second Language (ESL) programs; continue to offer City grant funds to organizations providing ESL programs.
- Support the access or creation of home repair and weatherization programs for low-income homeowners and affordable rental properties, and explore the most effective models or partners for such programs.

- Continue to track socio-economic census data for the City's various Equity Emphasis Areas.
- Monitor Home Mortgage Disclosure Act (HMDA) data to track and analyze how factors such as race and gender relate to "neutral" underwriting factors in the City.
- Reaffirm and respect the role and importance of rental housing and the value of the City's renters.
- Promote residential stability and neighborhood quality for communities of color by studying investments in community amenities that can improve quality-of-life and enhance the health of renters and homeowners.
- Support neighborhood-level organizing and community development: educate HOAs, condo associations, and community organizations about available programs, partners, and the meanings of governmental codes and regulations.
- Promote the City's Financial Empowerment Center's services and ability to advance financial education and financial wellness for the City's renters and owners.

Goal 2: Leverage City advocacy efforts for tools that create a foundation for opportunity and wealth creation.

- Work with partners to expand outreach and education about estate planning for homeowners and their families in communities of color.

- Work with organizations like the Housing Initiative Partnership (HIP) and others to expand homeownership counseling and education in communities of color that can help individuals determine if and when homeownership is right for them, overcome credit and down payment barriers, and learn skills that can help reduce the likelihood of default once they become a homeowner.



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- Monitor and assess the impacts of County, State, and federal regulations that will increase housing construction costs or expensive retrofits in aging rental properties and work to ensure there are support programs for financially impacted owners and residents.

- Support federal, state, and county programs and incentives that encourage energy efficiency upgrades that reduce utility costs for both homeowners and renters.
 - Support small-dollar loan products for home repair and modification programs.
 - Advocate for universal or reduced cost Wi-Fi access with private sector providers and non-profit partners. Study public sector opportunities.
 - Voice support for High School career programs for non-college bound students.
 - Support continued funding of federal, state, and county job training programs and community colleges.
 - Support Minority Chambers of Commerce and Contractor's Associations.
 - Encourage the participation of diverse developers, contractors, engineers, and architects from historically disadvantaged communities.
 - Advocate for the expansion of federal, state, or county projects that provide expanded transit access and safe bicycle and pedestrian facilities.
- Goal 3:** Support and advocate for actions or organizations that remove structural barriers in the lending and real estate industries and promote equitable, affordable housing opportunities.
- Encourage housing developments to use Community Development Financial Institutions (CDFIs) as they consider financing options. CDFIs provide financing for affordable housing development and mortgages to homebuyers, just like traditional lenders, as part of their social mission.
 - Reduce barriers to accessing rental housing by encouraging landlords to reduce, eliminate, or offset application fees and follow the U.S. Department of Housing and Urban Development's (HUD's) guidance on the use of criminal background checks in screening tenants.
 - Encourage the reporting of rent payments to credit bureaus and encourage landlords to participate in credit reporting programs so renters can build a positive credit history.
 - Work with Montgomery County and the Montgomery Housing Alliance to host learning exchanges that provide a venue for nonprofit homeownership development organizations to learn from each other's experiences including national nonprofit organizations that bring experience and knowledge.
 - Support the creation or expansion of "sweat equity" programs that afford homeownership opportunities in exchange for a commitment to spend a specified number of hours helping to build their own home or other participants' homes.
 - Work with Metropolitan Washington Council of Government (MWCOC) members to encourage federal reform and financial support for government-sponsored enterprises (GSE), such as Fannie Mae and Freddie Mac, to enact new systems that could change how mortgages are provided and priced, including

affecting the amount of down payment required, how lenders that sell loans to the secondary market verify borrowers' income, and how the costs of mortgage risk are allocated.



- Work with Metropolitan Washington Council of Government (MWCOCG) members to support, and encourage lending institutions, to adopt and implement strategies and practices outlined in Freddie Mac and Fannie Mae Equitable Housing Finance Plans.
- Encourage federally insured Credit Unions to enact Special Purpose Credit Programs that serve borrowers who are “economically disadvantaged,” provided the lender meets certain federal criteria in determining how to target the program.
- Support the protection of “disparate impact” as a legal tool that helps regulators and claimants hold lenders accountable for policies that have a disparate negative effect on minority groups.
- Encourage appraisal industry standards reform that could reduce appraisal gaps such as being allowed to use an alternative to the sales comparison approach.
- Encourage the lending industry and non-profit partners to close “appraisal gaps” through a combination of creative financing options and subsidies to cover the gap, when the appraised value is less than the sales price.
- Advocate to strengthen and support FHA mortgages.
- Review existing housing information portals that provide educational materials on creating and operating shared equity ownership models such as community land trusts; deed restrictions used to preserve long-term affordability, and limited-equity cooperatives (LECs), which instead of purchasing an individual unit, owners in a LEC purchase a share in a development.
- Encourage lending institutions to offer shared appreciation mortgages.
- Encourage the development community to use the seldom-used federal Low Income Housing Tax Credit (LIHTC) program provision that allows the offer of lease-purchase options to tenants of units (usually, but not exclusively, single-family homes) made affordable with LIHTCs.
- Encourage lenders to establish standards and work with families that have non-traditional sources of income, lack credit history, or with multiple earners contributing to the household, as these income sources are harder to verify.
- Encourage lending institutions to place branches, brokers, and mortgage services close to or within Equity Emphasis Area (EEA) communities.

- Encourage the National Association of Realtors (NAR) and its members to ensure practices such as racial steering are not acceptable.
- Work with MWCOG members to advocate for increased federal budgetary support of HUD's Office of Fair Housing and Equal Opportunity (FHEO) and having a diverse staff, representative of the customer base that experiences housing discrimination, including people of color and people with disabilities; training in culturally competent communications; and greater awareness of social services.

Goal 4: Ensure the availability and consideration of needs for senior housing and housing for individuals with disabilities.

- Encourage builders to build homes with features that could be adapted to accommodate people of all ages and abilities.
- Address mobility barriers by ensuring physical infrastructure and transportation options, such as sidewalks and ADA compliant ramps and street crossings are planned to serve these populations.
- Explore establishing a minimum percentage of multi-family rental units above the 5% requirement for Fair Housing Accessibility.

- Study reducing or eliminating permitting fees for improvements to existing residential ownership units that incorporate “universal design” features to allow “aging in place” or independent living so those units may be occupied by those with physical limitations.
- Preserve existing and approved age- and ability- restricted housing projects.
- Track changes in the City's senior population to assess the need for age-restricted units.
- Ensure projects include site design considerations for individuals with disabilities and seniors including equitable access to green/open spaces.



Key Points

- Individuals and families may experience discrimination and inequitable access to housing and financial products due to a myriad of factors, including but not limited to their race, ethnicity, disability status, age, and source of income. Strategies should strive to eliminate these characteristics as a barrier to achieving wealth and obtaining adequate housing. However, the City cannot do this alone, and will need to work with outside agencies and use its influence with higher levels of government to advocate for policies and actions that further fair housing.
- Strategies for closing the affordability gap should not focus solely on housing but should also include ways to expand educational opportunities and increase wealth potential, thereby reducing the burden of housing costs on one's income.
- The aging population and those with disabilities have unique housing needs and lower incomes, and often times face challenges in obtaining adequate housing. Strategies are needed to assist them in affording accessibility improvements in their homes, and consideration should be given to the need for age-restricted units and for expanding the supply of accessible units.



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7. Recommendation Matrix

The following matrix lists all recommendations and provides a timeframe for implementation as well as responsible parties. The timeframe of 0-5 years refers to new actions that will be implemented within the next 5 years. The timeframe of 5-10 refers to new actions that will be implemented 5-10 years in the future. Ongoing indicates an action that will continue beyond initial implementation and may have already been implemented.

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Planning & Zoning					
<i>Goal 1: Promote or create opportunities for a variety of housing types for current and future City residents of all income levels with costs that reflect the range of incomes.</i>					
Continue to track trends in housing supply and demand over time through surveys or studies to determine if the City should prioritize particular housing types.			✓	✓	
Track when regulated affordable units' control periods end and the impacts on the City's affordable and market rate inventory turn-over in the City to anticipate changing demands for various housing types, City programs and services, school enrollment, and commute patterns.	✓		✓	✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Study underutilized commercial sites, where appropriate, along transportation corridors such as MD 355 for potential residential conversions or infill redevelopments.	✓			✓	
Study regulatory options for co-housing, co-ops, or other shared ownership structures.	✓			✓	
The City's approval of multi-family rental projects should reflect unit sizes that are consistent with data-supported renters' household size needs.			✓	✓	
Establish targets for housing unit type mix in future residential development projects where appropriate to maintain a balanced housing stock. Applicability of these requirements should take into account development size, surrounding context, and site constraints. Possible requirements may include limits on single-family detached construction and a minimum percentage of Gap Housing units, such as was done in the Lakeforest Mall Master Plan.	✓		✓	✓	
Perform ongoing reviews of land use zoning, regulations, and processes for barriers or obstacles to producing diverse housing or to incentivize the types of units either not being built and in short supply relative to demand.	✓		✓	✓	
Study and potentially allow ADUs in specific single-family areas.	✓			✓	
<i>Goal 2: Plan for amenities and infrastructure so that existing neighborhoods can remain resilient and new housing is sited in neighborhoods with a community identity</i>					
Foster a climate of full participation in cultural and civic life; ensure City events and outreach for events cater to all demographic groups.			✓	✓	
Research expanding site development notification requirements to renters as well as owners.	✓			✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Promote mixed-income communities in the Land Use Element and zoning revisions.	✓			✓	
Encourage development proximate to future and existing transit hubs and employment nodes.			✓	✓	
Assess neighborhood infrastructure and support needs (i.e. parks and open space, schools, multi-modal transportation options, shopping, etc.) through data analysis, public input, and surveying existing walkable neighborhood amenities and infrastructure.	✓		✓	✓	
Monitor the locations and types of infrastructure improvements planned to ensure they are balanced and address equity disparities throughout the City while reflecting the prioritized needs established through data or policies.	✓		✓	✓	
Consider incentives for the adaptive reuse of aging commercial buildings to residential that incorporate green areas, outdoor gathering or recreational areas, have bicycle and pedestrian connectivity facilities, and be proximate to locations for basic goods, services, and transit.		✓		✓	
Establish a 2035 Jobs to Housing Ratio goal of 2:1 with the intent that the majority of the City jobs reflect various career and salary levels that support home ownership.	✓			✓	
Define the following as “City employment nodes”: areas that support a concentration of employment uses that reflect the sectors and salaries ranges desired by the City, and will contribute to achieving the City’s 2035 Jobs to Housing Ratio goal. Residential developments should leverage and be proximate to these nodes, but not incorporated in them.	✓			✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Policies & Programs					
<i>Goal 1: Preserve existing affordable homes (both market rate affordable and regulated affordable).</i>					
Inspect and monitor the supply of existing affordable homes, including Moderately Priced Dwelling Units (MPDUs) and Workforce Dwelling Units (WFHUs). Inspections, of the properties and units, would occur as needed and concurrent with current City policies and practices. Monitoring of income and price-restricted homes would include their affordability period expirations, income levels and requirements, rents, and prices.			✓	✓	
The City's Neighborhood Services - Code Enforcement program identifies and inspects residential properties on a consistent basis. Staff inspections and enforcement of the City's safety regulations provide a wealth of data to help identify housing in need of repair and upgrades to improve livability. This information could form the foundation to develop a menu of interventions to improve housing conditions. This could also serve as an incentive to use an array of financing resources to pay for needed repairs.			✓	✓	
Consider the development of an "early warning system" to identify properties, both rental and ownership, before they fall into disrepair and/or have their affordability requirements expire. An "early warning system" could also be used to identify areas of the City that have homes with concentrated code violations.	✓			✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Develop a housing preservation and rehabilitation program that includes incentives for existing rental property owners and homeowners. Incentives would be designed to help owners repair their own homes as well as rental homes and apartments. The incentives would include repairs and property upgrades that address the occupant's health, safety, and overall home livability as well as upgrades to improve energy efficiency, access, and mobility to persons with disabilities and allow a household to age in place.	✓			✓	
Consider the use of City-provided grants or low or no-interest loans to owners of existing homes – both rental and ownership. Possible sources of funding could include the Community Development Block Grant (CDBG) and Housing Initiative Fund (HIF).	✓			✓	
Consider the use of tax incentives, such as abatements, to encourage owner repairs and property improvements that make the property more energy efficient and accessible. There are models of incentives such as tax abatements that reduce or waive taxes on the repair-added value (i.e. the additional value to the property that resulted from the improvements; that added value would not be taxed).		✓		✓	
Explore the creation of a Community Land Trust (CLT). Community land trusts are typically not-for-profit organizations created for the sole purpose of preserving affordable housing. CLTs preserve affordability by purchasing an existing property and covenanting permanent affordability (rents or sale prices).		✓		✓	✓

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Coordinate with local nonprofit organizations to explore the creation of a Community Land Trust to provide permanent affordable housing to low- and moderate-income families. Permanent affordable housing could include units with sufficient bedrooms, 3 or more, as well as in-house amenities to accommodate families with children and multigenerational households and accessible features to accommodate persons with disabilities.		✓		✓	✓
Provide preservation information utilizing the City's Communications & Public Engagement team and other outreach and engagement programs to improve program access. Information could also include programs and services offered by non-City of Gaithersburg sources, such as the State of Maryland, Montgomery County, and a wide range of non-profit organizations like Rebuilding Together, the Housing Initiative Partnership (HIP), and Habitat for Humanity.			✓	✓	✓
<i>Goal 2: Help people remain in their housing and provide access to affordable homes.</i>					
Continue Community Services' street outreach and engagement to identify homeless individuals; counseling, services, rental assistance, and mortgage assistance.			✓	✓	
Work with Neighborhood Services and other local agencies, including police, sheriff, and courts on eviction processes to prevent or slow evictions.			✓	✓	✓
Conduct a survey of renters and homeowners to identify barriers to housing called out in the MWCOG Analysis of Impediments to Fair Housing Plan / Fair Housing Plan (AI) and additional barriers such as Covid-19.		✓		✓	✓

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Provide information, services, and financial assistance (i.e. on economic literacy and renting and home buying processes). Utilize the City's Communications and Public Engagement Team to get information on services and financial assistance out to residents.			✓	✓	
Provide outreach, engagement, and information to seniors on their options, including access to resources that allow them to age in place (i.e. financial and other resources). Several programs mentioned above, including home repair and upgrades, could be used to help seniors age in place.			✓	✓	
Provide information and consider technical assistance and funds to make home repairs and upgrades to make them more accessible (i.e. grab bars, exit ramps, roll-in showers, and other accessible enhancements). One potential source of funds for this purpose include the City's CDBG program.			✓	✓	
The MPDU/WFHU program is another way to provide affordable housing to persons with disabilities. A portion of the affordable MPUDs/WFHUs units provided as part of a market rate development can be made accessible for persons with disabilities (the number of accessible units would be determined during the development review process).			✓	✓	
Review and survey GHALP customers and other homebuyer assistance programs in the region (MWCOG members and the State of Maryland) to identify any barriers to lending. Consider GHALP programmatic changes to address any barriers and work with partner local governments if changes beyond Gaithersburg are needed.	✓			✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Consider ways to strengthen the City's GHALP program, including larger loans, increased outreach, and technical assistance.	✓			✓	
Explore other sources of funds to be combined with the City's GHALP program (i.e. Montgomery County, State of Maryland, and private sources including large lenders and credit unions).	✓			✓	✓
Strengthen and expand the network of partner agencies to help renters and owners. Provide information, services, and financial assistance (i.e. on economic literacy and renting and home buying processes). The City's new Financial Empowerment Center (FEC) offers an opportunity to connect renters and owners with services and information to obtain or maintain affordable rental and ownership housing.			✓	✓	✓
Provide information and counseling to Gaithersburg renters and make relevant referrals to services and resources. This would include, but not be limited to helping tenants access other rental assistance (i.e. HOC Housing Choice Vouchers and the City's Emergency Assistance (EA) funds). A component of the City providing short-term rental assistance is also looking at the longer-term efficacy of this program and developing stronger connections to City and other programs to foster sustainable independence for EA fund recipients.			✓	✓	✓
Help priority populations and people living in equity emphasis/focus areas obtain an affordable home in Gaithersburg (rental or ownership).			✓	✓	✓

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Goal 3: Identify, promote, and consider incentives that produce homes the market does not produce to meet community needs.					
Explore the use of the City’s Housing Initiative Fund (HIF) to include no- or low-interest loans to developers in combination with the MPDU/WFHU program to incentive the production of new affordable units. Currently, the City’s GHALP program can be used for MPDU/WFHU purchasers.	✓			✓	
Consider creating a self-sustaining Gaithersburg Innovative Housing Trust Fund (GIHTF). This fund could be seeded by an initial HIF contribution and include other sources such as transfer fees and developer contributions and other potential revenue sources. The expectation is that trust fund dollars would leverage other sources of funding including Montgomery County housing funds, State of Maryland funds, federal tax credits and loan and grant funds, and other private funds (i.e. corporate and foundation funds). The fund could be used to provide loans for long-term or short-term use. Short-term use would be financing for up to 5 years (i.e. taken out as a funded development obtains its permanent financing). Long-term use could be up to 30 years or more when used as part of the permanent financing package (private debt and potentially other long-term public debt).	✓			✓	
Consider providing City financial incentives such as HIF to developers to produce affordable homes. This could include lower rents at the 30% to 50% of AMI range. This range would serve households earning from approximately \$30,000 to \$80,000/year. As mentioned above, the City could provide HIF financing in combination with the MPDU/WFHU program to achieve deeper affordability/lower rents.	✓			✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Collaborate with organizations to optimize and/or leverage City affordable housing investments. These agencies would include Montgomery County DHCA, Housing Opportunity Commission (HOC), and non-profits like Montgomery Housing Partnership (MHP) to meet City housing goals and objectives. Collaboration with other funding sources like the Washington Housing Initiative – Impact Pool and Amazon’s Equity Fund provide two private sector options.			✓	✓	✓
Advocate for the collaboration of local large Gaithersburg employers to develop ways to help their employees live closer to reduce their housing and transportation expenses.		✓		✓	✓
Identify opportunities for owners to redevelop, acquire, and/or complete upgrades of aging, underutilized or functionally obsolete properties. For example, these could be vacant properties along or near transit corridors, including the mixed-use Frederick Avenue corridor which may offer such opportunities adjacent to existing residential properties for potential residential use.			✓	✓	✓
Allocate City financing incentives on a competitive basis that rewards innovative building and overall development practices (i.e. such as creating net-zero, energy efficient homes).	✓		✓	✓	
Explore best practices and innovative affordable housing options that have been completed elsewhere; consider adding one or more of these best practices to the City’s incentive review process (i.e. Request for Proposals (RFP) for its housing funds).	✓			✓	
Consider adjustments to the City’s MPDU/WFHU programs to produce the types of units in most demand/short supply. This would include a review of MPDU/WFHU program calibration – required percentages, incomes, rents, and, sale prices (i.e. MPDUs at lower rents such as at 30% to 50% AMI).	✓			✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Review the current affordability period of 30 years for rental MPDUs/WFHUs. Concerns have been raised that after the affordability period, rents could increase and displace tenants at that time in the future. Neighboring jurisdictions are considering 99-year affordability periods.	✓			✓	
The MPDU/WFHU program is another way to provide affordable housing to seniors and persons with disabilities. Consider setting aside a portion of the affordable MPDUs/WFHUs units provided as part of a market rate development as accessible – “universal design” - for persons with disabilities (the number of accessible/“universal design” units would be determined during the development review process).	✓			✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Equity & Social Justice					
<i>Goal 1: Advance City tools that create a foundation for opportunity and wealth creation.</i>					
Consider the inclusion of day care and other social support uses in the review of residential developments and review any regulatory barriers to their inclusion.			✓	✓	
Support local minority and women-owned businesses; review the use and effectiveness of current economic development programs on these businesses.			✓	✓	
Continue to track the presence of food deserts and work towards ensuring equal access to nutritional meals.			✓	✓	
Survey, and where unmet need is identified, develop and support culturally responsive education and counseling programs. Continue to support agency partners such as Montgomery County Public Schools in this effort.	✓		✓	✓	✓
Support legal aid programs; continue to offer City grant funds to organizations providing legal aid.			✓	✓	✓
Foster an environment that grows residents' incomes and creates more jobs, including support for fully funding workforce development providers, trade schools, and training organizations. For small businesses, support access to business support organizations and flexible, low-cost capital to help them plan, start, and grow their operations.			✓	✓	✓
Direct job and career fairs to be hosted in high unemployment or low median income areas.			✓		✓

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Support English as a Second Language (ESL) programs; continue to offer City grant funds to organizations providing ESL programs.			✓	✓	✓
Support the access or creation of home repair and weatherization programs for low-income homeowners and affordable rental properties, and explore the most effective models or partners for such programs.	✓			✓	
Continue to track socio-economic census data for the City's various Equity Emphasis Areas.			✓	✓	
Monitor Home Mortgage Disclosure Act (HMDA) data to track and analyze how factors such as race and gender relate to "neutral" underwriting factors in the City.	✓		✓	✓	
Reaffirm and respect the role and importance of rental housing and the value of the City's renters.			✓	✓	
Promote residential stability and neighborhood quality for communities of color by studying investments in community amenities that can improve quality-of-life and enhance the health of renters and homeowners.	✓		✓	✓	
Support neighborhood-level organizing and community development: educate HOAs, condo associations, and community organizations about available programs, partners, and the meanings of governmental codes and regulations.			✓	✓	✓
Promote the City's Financial Empowerment Center's services and ability to advance financial education and financial wellness for the City's renters and owners.			✓	✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
<i>Goal 2: Leverage City advocacy efforts for tools that create a foundation for opportunity and wealth creation.</i>					
Work with partners to expand outreach and education about estate planning for homeowners and their families in communities of color.	✓			✓	✓
Work with organizations like the Housing Initiative Partnership (HIP) and others to expand homeownership counseling and education in communities of color that can help individuals determine if and when homeownership is right for them, overcome credit and down payment barriers, and learn skills that can help reduce the likelihood of default once they become a homeowner.			✓	✓	✓
Monitor and assess the impacts of County, State, and federal regulations that will increase housing construction costs or expensive retrofits in aging rental properties and work to ensure there are support programs for financially impacted owners and residents.			✓	✓	
Support federal, state, and county programs and incentives that encourage energy efficiency upgrades that reduce utility costs for both homeowners and renters.			✓	✓	✓
Support small-dollar loan products for home repair and modification programs.			✓	✓	✓
Advocate for universal or reduced cost Wi-Fi access with private sector providers and non-profit partners. Study public sector opportunities.			✓	✓	✓
Voice support for High School career programs for non-college bound students.			✓	✓	✓
Support continued funding of federal, state, and county job training programs and community colleges.			✓	✓	✓

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Support Minority Chambers of Commerce and Contractor's Associations.			✓	✓	✓
Encourage the participation of diverse developers, contractors, engineers, and architects from historically disadvantaged communities.			✓	✓	✓
Advocate for the expansion of federal, state, or county projects that provide expanded transit access and safe bicycle and pedestrian facilities.			✓	✓	✓
<i>Goal 3: Support and advocate for actions or organizations that remove structural barriers in the lending and real estate industries and promote equitable, affordable housing opportunities.</i>					
Encourage housing developments to use Community Development Financial Institutions (CDFIs) as they consider financing options. CDFIs provide financing for affordable housing development and mortgages to homebuyers, just like traditional lenders, as part of their social mission.	✓		✓		✓
Reduce barriers to accessing rental housing by encouraging landlords to reduce, eliminate, or offset application fees and follow the U.S. Department of Housing and Urban Development's (HUD's) guidance on the use of criminal backgrounds in screening tenants.	✓		✓		✓
Encourage the reporting of rent payments to credit bureaus and encourage landlords to participate in credit reporting programs so renters can build a positive credit history.	✓		✓		✓

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Work with Montgomery County and the Montgomery Housing Alliance to host learning exchanges that provide a venue for nonprofit homeownership development organizations to learn from each other's experiences including national nonprofit organizations that bring experience and knowledge.	✓		✓	✓	✓
Support the creation or expansion of "sweat equity" programs that afford homeownership opportunities in exchange for a commitment to spend a specified number of hours helping to build their own home or other participants' homes.			✓		✓
Work with Metropolitan Washington Council of Government (MWCOC) members to encourage federal reform and financial support for government-sponsored enterprises (GSE), such as Fannie Mae and Freddie Mac, to enact new systems that could change how mortgages are provided and priced, including affecting the amount of down payment required, how lenders that sell loans to the secondary market verify borrowers' income, and how the costs of mortgage risk are allocated.	✓			✓	✓
Work with Metropolitan Washington Council of Government (MWCOC) members to support, and encourage lending institutions, to adopt and implement strategies and practices outlined in Freddie Mac and Fannie Mae Equitable Housing Finance Plans.	✓			✓	✓
Encourage federally insured Credit Unions to enact Special Purpose Credit Programs that serve borrowers who are "economically disadvantaged," provided the lender meets certain federal criteria in determining how to target the program.	✓				✓
Support the protection of "disparate impact" as a legal tool that helps regulators and claimants hold lenders accountable for policies that have a disparate negative effect on minority groups.			✓		✓

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Encourage appraisal industry standards reform that could reduce appraisal gaps such as being allowed to use an alternative to the sales comparison approach.	✓				✓
Encourage the lending industry and non-profit partners to close “appraisal gaps” through a combination of creative financing options and subsidies to cover the gap, when the appraised value is less than the sales price.	✓				✓
Advocate to strengthen and support FHA mortgages.	✓				✓
Review existing housing information portals that provide educational materials on creating and operating shared equity ownership models such as community land trusts; deed restrictions used to preserve long-term affordability, and limited-equity cooperatives (LECs), which instead of purchasing an individual unit, owners in a LEC purchase a share in a development.		✓		✓	
Encourage lending institutions to offer shared appreciation mortgages.	✓				✓
Encourage the development community to use the seldom-used federal Low Income Housing Tax Credit (LIHTC) program provision that allows the offer of lease-purchase options to tenants of units (usually, but not exclusively, single-family homes) made affordable with LIHTCs.	✓		✓	✓	✓
Encourage lenders to establish standards and work with families that have non-traditional sources of income, lack credit history, or with multiple earners contributing to the household, as these income sources are harder to verify.	✓		✓		✓
Encourage lending institutions to place branches, brokers, and mortgage services close to or within Equity Emphasis Area (EEA) communities.		✓	✓		✓

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Encourage the National Association of Realtors (NAR) and its members to ensure practices such as racial steering are not acceptable.	✓		✓		✓
Work with MWCOG members to advocate for increased federal budgetary support of HUD's Office of Fair Housing and Equal Opportunity (FHEO) and having a diverse staff, representative of the customer base that experiences housing discrimination, including people of color and people with disabilities; training in culturally competent communications; and greater awareness of social services.	✓				✓
<i>Goal 4: Ensure the availability and consideration of needs for senior housing and housing for individuals with disabilities.</i>					
Encourage builders to build homes with features that could be adapted to accommodate people of all ages and abilities.	✓		✓	✓	
Address mobility barriers by ensuring physical infrastructure and transportation options, such as sidewalks and ADA compliant ramps and street crossings are planned to serve these populations.	✓		✓	✓	✓
Explore establishing a minimum percentage of multi-family rental units above the 5% requirement for Fair Housing Accessibility.	✓			✓	
Study reducing or eliminating permitting fees for improvements to existing residential ownership units that incorporate "universal design" features to allow "aging in place" or independent living so those units may be occupied by those with physical limitations.	✓			✓	
Preserve existing and approved age- and ability- restricted housing projects.			✓	✓	

Recommendation	Timeframe for Implementation			Responsibility	
	0-5 Years	5-10 years	Ongoing	City	Outside Agency
Track changes in the City's senior population to assess the need for age-restricted units.			✓	✓	
Ensure projects include site design considerations for individuals with disabilities and seniors including equitable access to green/open spaces.			✓	✓	



CITY OF
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Housing Element of the 2018 Master Plan: Adopted xxx