



May 31, 2023

Nancy Hafford, Chair
Baltimore County Planning Board
Jefferson Building
105 West Chesapeake Avenue
Towson, Maryland 21204

Via email – info@towsonchamber.com

Master Plan 2030 – Comments and Recommendations

Dear, Chair Hafford and Planning Board Members:

The NAIOP Maryland Chapters represent more than 700 companies involved in all aspects of commercial, industrial, and mixed-use real estate, including some of the largest property owners in Baltimore County. On behalf of our member companies, I write to urge you and the other members of the Baltimore County Planning Board to withhold support for the draft Master Plan 2030 until further refinements and clarifications to the Plan are completed.

The 2030 Master Plan must provide the foundation to achieve important economic, environmental, and social goals. The Plan must present a renewed strategic approach to future growth that recognizes that the County is reaching build out under its current framework, and embraces the County's role and responsibilities as a regional employment and housing leader. The Plan must also be nimble enough to adjust to the land use implications of changing post-COVID 19 employment, retail, transportation, and housing trends.

Based on the review of land use practitioners and development professionals, NAIOP does not believe the Plan as currently drafted provides an adequate framework to guide and accommodate future growth. The most important areas of concern that we would like the Planning Board to consider:

- **More Explicit Support for Density Inside the URDL is Necessary** - The Plan envisions accommodating future growth without expanding the Urban Rural Demarcation Line (URDL) but acknowledges that development potential within the URDL is limited. It makes sense from an economic, environmental, and social perspective to concentrate growth within the URDL. Furthermore, the state's climate mitigation strategies and plans to restore Chesapeake Bay water quality depend on concentrating growth within the sewer service areas of Baltimore and the other central Maryland counties. In order to achieve these outcomes, the Plan must provide more conviction and explicit policy support for increasing density inside the URDL. Development and redevelopment should not be limited to the Core Retrofit Areas or be controlled by the Place Types Map designated in the Plan. More by-right

opportunities to achieve density within the URDL need to be created and the existing tools should not be weakened.

- How will the Dynamic Plan Function? - The Plan states the Planning Department's intent that its contents be living and dynamic but does not provide detail about how changes to the Plan will be initiated, reviewed, and approved and what criteria will be used to determine compliance with a dynamic and changing plan. A better understanding of how development teams should view and consider the content and legal status of a dynamic Plan is needed.
- What Planning Tools Are Available to Implement MP 2030? - The Plan recommends moving comprehensive rezoning from every four years to once every 10 years and endorses revisions to the Planned Unit Development Process. A 10-year comprehensive rezoning schedule will slow evolution of Plan implementation and make the Plan less dynamic. The PUD is the primary tool for innovative mixed-use developments in the county, providing design options, land planning innovations and the flexibility necessary to achieve the densities required to implement the Plan's URDL growth strategy. Poorly conceived changes to the PUD process could limit the ability of design teams to bring innovative, exciting and impactful development projects to Baltimore County.
- The Need to Reduce Confusion and Conflicts - The definitions of Core Retrofit Areas, Place Types, and incorporation of external documents, some of which link to third-party websites, raise concerns that the Plan will contain conflicting internal statements and that it will memorialize conflicts between the Plan, existing and future land uses. The Planning Board should take steps to reduce conflicts by removing the inclusion of external documents and writing flexibility into general definitions and designations, so they provide high level guidance.
- Objective Performance Targets for Small Area Plans - The Plan sets the stage for small area plans to further refine recommendations and implementation. Without performance objectives, small area planning efforts can become exclusionary and parochial. The Planning Board should take steps to ensure small area planning efforts recognize the comprehensive nature of the planning process, the need to accommodate future growth within the URDL and Baltimore County's traditional leading role as a housing and employment center.
- Development Capacity Estimates Need Further Evaluation - The county's current modeling shows 60% of projected future residential development capacity is located on parcels that are already developed. The range of estimated capacity is wide - between 10,868 to 29,188 units. More needs to be understood about the size of parcels in the analysis and the assessed value of existing improvements on these parcels as well as the attributes of development parcels in non-residential zones to fully understand the feasibility of future development capacity. Further, we are not aware of any analysis showing the Core Retrofit Areas are positioned to accommodate forecasted growth as anticipated by the Plan.
- Time Allowed for Review Should be Reconsidered - The time allowed for review of the draft Plan - twelve days in April and the early May Planning Board comment period - was not adequate to review the material presented or understand the documents incorporated by reference. For a large

membership organization like ours to evaluate the various elements of a Master Plan and provide consensus-based comments requires more time.

- NAIOP Endorses the MBIA Request for a Master Plan Workgroup – It is our understanding that MBIA has requested that the Planning Board create a stakeholder group to advise the Board as it prepares a final plan for consideration by the County Council. NAIOP agrees that would be a constructive and important step to take. The Plan is not just an expression of community sentiment and aspirational goals, it must be a functional document that the Planning Board can administer. The Maryland Department of Planning’s materials for the *Planning Board and Board of Appeals Education Course* specifically mention that creating an advisory group is an appropriate way for Planning Boards to represent the overall public interest in the development of the comprehensive plan.

Thank you for considering NAIOP’s point of view.

Sincerely,



Tom Ballentine, Vice President for Policy
NAIOP Maryland Chapters -*The Association for Commercial Real Estate*

cc: tbensley@baltimorecountymd.gov