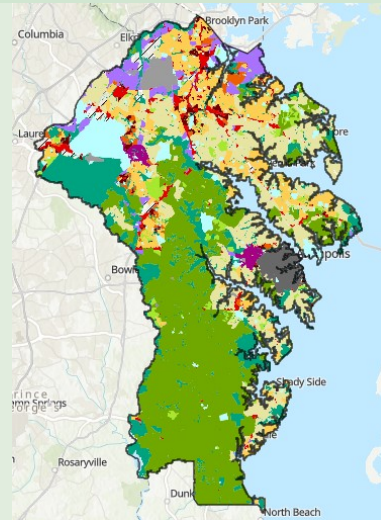




ALLIANCE

FOR LIVABLE COMMUNITIES

## Commercial real estate association airs Plan2040 concerns



### **NAIOP letter shows a mismatch of priorities with most current County residents.**

In a 25-page letter to the County Council, the Maryland chapter of the Association for Commercial Real Estate submitted its detailed comments on Plan2040. Current citizens of the County are encouraged to review this [NAIOP Comment Letter to County Council](#) to gain a better understanding of developer's views on the optimum way forward.

Although the NAIOP comments sometimes appear to be well thought out from an abstract planning perspective, the reader should not expect compatibility of these perspectives with the desires of County citizens expressed in the various public input venues for Plan2040. What would be best for the real estate and development industries is not necessarily optimum for the quality of life of County citizens.

### **Recommendations reveal commercial emphasis**

Distributed throughout the NAIOP document are 32 key recommendations for changes in the Plan. Some of these, such as consideration of use of Form-based code are quite sensible. However, others reveal the profit-driven motivation of the association members.

These latter include:

1. Revise development capacity estimates in Plan2040 that are claimed to be badly in error and acknowledge a housing shortfall of 48,000 units by 2040.
2. Adopt much higher densities in core growth and transit-oriented-development areas. Dramatically increased building height limits, for example, are needed to make multi-story, multi-use buildings projects with structured parking more economically attractive for developers
3. Deemphasize compatibility with existing use in rezoning decisions
4. Consider selectively increasing densities outside of core areas by one class higher

5. Evaluate up-zoning of R2 and R5 vacant land with potential sewer service
6. Expand by-right development options within growth areas
7. Institute nutrient trading and TMDL allocations among sectors to accommodate growth.
8. Establish a decision framework and criteria for expanding boundaries of designated growth areas in future GDPs
9. Do not place further limits on the use of modifications

### **Environmental protection as an obstacle to growth**

It is, perhaps, not surprising that all discussion of environmental issues in the letter is focused on the limits they impose on development. The letter notes that the presence of forest and the Forest Conservation Plan is one of the most significant factors limiting the future growth potential of the County. However, also of great concern are the TMDL nutrient caps that impact storm water and sewage treatment. Ten of 25 pages of the document are devoted to TMDL accounting and allocation suggestions, including ideas about nutrient trading markets between regions. Conversion of agricultural land to urban uses is also suggested to be an effective mechanism for reduction of TMDL contributions from agriculture. Claims that development can actually result in reduction of TMDL contributions are supported by the extreme example of a LEED-certified complex in Montgomery County.

### **About the urgent need to satisfy the market**

Overall, the letter frequently refers to the market demand for development presented in the [RKG Land Use Market Analysis](#) from 2019, and alarm is expressed that the housing capacity analysis in Plan2040 may underestimate actual capacity. The implication is that SOMETHING MUST BE DONE! But most citizens may observe that their quality of life might even improve if real estate supply lagged demand. Anne Arundel County isn't racing to demonstrate that it can be the biggest, tallest place. Rather, the focus of most current citizens is upon being Best Place – For All.

If the NAIOP perspective differs from yours, [Contact your County Council representatives](#). Remind them that most of their constituents are not real estate developers and have priorities that are different from those expressed by NAIOP.

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#### **About the Alliance**

*The Anne Arundel Alliance for Livable Communities is a non-partisan coalition of 25 local and state organizations advocating for sustainable growth and environmental protections to safeguard and enhance residents' quality of life.*

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## **Anne Arundel Alliance for Livable Communities**



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