

## Maryland Sustainable Growth Commission (November 16, 2016)

Comments on Reinvest Maryland Report – Recommendations on “Identify and Address Regulations and Policies that May Impede Reinvestment” (without attribution)

*(Commission members are encouraged to add, correct or clarify any of the comments recorded below. Please send your changes to Chuck Boyd)*

- The Forest Conservation Act is an impediment to redevelopment efforts. It adds extra cost to redevelopment projects. There should be an option for redevelopment projects to simply pay a fee in lieu.
- The Forest Conservation Act fails to recognize urban areas are different, and also doesn't take into account local landscaping requirements that could be significant. There should be allowances to enable forestation to interconnect green areas in urban settings.
- Regulations increase the cost of development getting through the entitlement process.
- Impact fees are counter intuitive in promoting development and in particular directing development to redevelopment areas.
- Connections fees for water and sewer are much more expensive than the cost of installing a well and septic system. Many local jurisdictions do not provide for tiered connection fees to align with proposed water usage making smaller projects pay the same fees as larger projects.
- Fire protection (sprinkler) requirements for single-family homes are unnecessary and unduly burdensome in areas without public facilities. Rolling back these requirements should be considered.
- Water and sewer connection fees are a major impediment to development.
- Traffic improvements and unnecessarily high parking requirements are also an impediment.
- SHA is considering requiring all intersection turning movements to operate at Level of Service D. This could have significant impact on the cost to new developments.
- Transportation Adequate Public Facility Ordinances (APFOs) are based on cars and do not consider other transportation alternatives.
- The process of development approvals should have time limits and approving agency accountability – that would be a good goal.
- Consider resetting the aging of permits to allow more time for developer to complete the project.
- Access permits are now being handled at SHA's regional office – that is good step in the right direction.
- The cost of rehabilitating older housing stock is much more expensive than building new. Adding additional requirements such as “green” building standards, historic or other local design standards, and code requirements do not encourage reuse and redevelopment of existing properties.
- The local government development approval process is not predictable.
- Local governments often do not fully appreciate the development process. They need to recognize that at times low bid may not be the best decision and that cost of doing a project the right way may cost more.
- Look at Downtown Columbia for some best practices in promoting redevelopment.

- Columbia has a Downtown Overlay zoning district and modified APFO requirements.
- School APFOs and the associated potential school moratorium need to be addressed at the local level. Due to slow growth in the past few years, the problem with school APFOs has been as apparent as it really is.
- Stormwater regulations are an impediment to promoting redevelopment
- Building Codes based on national code standards are a problem. The life-safety requirements need to be evaluated. Now, building codes are considering adding “Green” standards, which will add to the problem.
- Regulations need to be more scalable to size of the project.
- Flexibility and cooperative problem-solving in respect to regulations are important to encouraging redevelopment.