



January 21, 2025

The Honorable, Brian J. Feldman, Chair  
Senate Education, Energy, and the Environment Committee  
2 West Senate Office Building  
Annapolis, Maryland 21401

**Support w Amendments: SB 266 – Comprehensive Plans - Planning Principles**

Dear Chair, Feldman and Committee Members:

The NAIOP Maryland Chapters represent approximately 700 companies involved in all aspects of commercial, industrial, and mixed-use real estate. On behalf of our member companies, I am writing to support SB 266 with amendments.

SB 266 replaces twelve *smart growth* visions, most of which date back to the Economic Growth, Resource and Planning Act of 1992, with eight planning principles.

The *smart growth* visions were designed to help jurisdictions achieve higher levels of economic growth, resource protection and better planning outcomes by directing population and employment growth to designated growth areas where infrastructure and public services were also to be located. Local jurisdictions are required to implement these visions in their comprehensive land use plans and incorporate them into land use and development policies, regulations and decisions.

NAIOP believes it is appropriate to reconsider and revise the planning visions to make them more relevant and responsive to the land use needs and challenges of today. While we support what we believe is the intent of the legislation we are not convinced that the text of the planning principles in the bill as introduced provide a sufficient foundation for the future.

We have referred the bill to our land use, planning and zoning review group and would like to work with the Department and other stakeholders on constructive changes to the proposed planning principles.

**For these reasons, NAIOP respectfully requests your favorable with amendments report on SB 266.**

Sincerely,

A handwritten signature in blue ink, appearing to read "T.M. Ballentine".

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

cc: Education, Energy, and the Environment Committee Members  
Nick Manis – Manis, Canning Assoc.