



March 3, 2025

The Honorable, Guy Guzzone, Chair
Senate Budget and Taxation Committee
Miller Senate Office Building, 3 West
Annapolis, Maryland 21401

Unfavorable: SB 881 – Regional Transportation Authorities

Dear Chair, Guzzone and Committee Members:

The NAIOP Maryland Chapters represent approximately seven hundred companies involved in all aspects of commercial, industrial, and mixed-use real estate. On behalf of our member companies, I am writing in opposition to SB 881.

- The new transportation transfer tax surcharge would “double tax” entities that own real estate. In most jurisdictions commercial real estate is already subject to impact fees, special taxing district assessments and excise taxes that generate transportation funding. Adequate Public Facilities regulations generate in-kind services in the form of upgraded intersections and road improvements as a condition of commercial real estate development approval.
- The relationship between the authorities created in the bill and the current metropolitan planning organizations is unclear.
- The purposes of the authorities do not mention the need to move freight which, given the role of the Port of Baltimore, BWI Thurgood Marshall Airport and the state’s interstate highway networks should be a central purpose.
- The role of existing transportation infrastructure, and future needs have changed due to post-COVID commuting and shopping patterns. Policy makers should incorporate those dynamics and changing use patterns into transportation spending plans before establishing a new tax framework.

For these reasons, NAIOP respectfully requests your unfavorable report on HB 881.

Sincerely,

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

cc: Budget and Taxation Committee Members
Nick Manis – Manis, Canning Assoc.