



March 6, 2026

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

**Unfavorable: SB 836 – Carroll County District Planning Commissions - Authorization**

Dear, Chair Feldman and Committee Members:

On behalf of the NAIOP Maryland Chapters representing seven hundred companies involved in all aspects of commercial, light-industrial, and mixed-use real estate, I am writing to recommend your unfavorable report on SB 836

**Overview of SB 836**

Senate Bill 836 authorizes Carroll County to create district planning commissions – smaller sub county planning bodies with the same powers and duties as the county-wide Planning Commission. The County Commissioners are authorized to divide the county into planning districts and appoint district commission members that would have the same planning and zoning authority as the county planning commission.

**Rationale for NAIOP's Position**

The bill authorizes inconsistent standards across the county and invites hyper-local considerations to undermine comprehensive planning objectives. The bill only requires uniform county-wide administration of zoning *“unless specified otherwise in the district zone regulations.”*

Carroll County is currently using a series of legislated moratoria called development deferrals to halt review of mature development applications for the purpose of materially changing the zoning and development regulations before the projects reach final approval. This recent development represents an unfortunate breakdown and misuse of the county's delegated planning and zoning authority.

SB 836 risks institutionalizing and making permanent this kind of fragmented county planning strategy where development district appointees adopt different zoning philosophies than those of the county-wide planning commission and adopted comprehensive land use plans.

**For these reasons, NAIOP respectfully recommends your unfavorable report on SB 836.**

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.