



January 19, 2026

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

Support w Amendment: SB 197 – Alteration of Comprehensive Plan Elements

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 197 with amendments.

SB 197 alters the required elements of comprehensive land use plans of charter counties. It introduces new elements and revises others to focus the plans on six subject areas: Land, Transportation, Economy, Equity, Resilience, and Ecology. The bill also requires that the plan be based on or informed by current and future conditions as well as the content of existing state level plans related to the plan elements.

NAIOP believes it is appropriate to reconsider and revise the comprehensive plan elements to make them more relevant and responsive to the land use needs and challenges of today. We also believe taking steps to underpin local land use plans with more data and technical analysis will improve the final product, ultimately benefitting residents of charter counties and the state.

While we support the intent and general direction of the legislation, we have scheduled meetings with the Department of Planning to learn more about specific elements and implementation. We look forward to working with the Committee, Department and other stakeholders as SB 197 is being considered by the Senate.

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.