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April 2, 2026

Environment and Transportation Committee
Maryland House of Delegates
200 Taylor House Office Building
Annapolis, MD 21

RE: SB 225 Environment – Interjurisdictional Watersheds – Flood Management

Position: Unfavorable

Dear Chair Korman, Vice Chair Guyton, and members of the Committee:

Thank you for the opportunity to submit this testimony on behalf of the Baltimore Regional Housing Partnership (BRHP) respectfully urging an unfavorable report on SB 225.

BRHP is a non-profit organization that expands housing choices for families with low incomes who have historically been excluded from housing in well-resourced neighborhoods, helping them to access and transition successfully to safe, healthy, and economically vibrant communities. As the Regional Administrator for the Baltimore Housing Mobility Program, BRHP has opened pathways to a better future for low-income families for over 10 years. BRHP currently provides over 4,300 low-income families rental assistance in the form of the Housing Choice Voucher and couples that with counseling support for families as they move from areas of concentrated poverty to areas of opportunity in Baltimore City and the five surrounding counties.

Maryland is facing a severe housing shortage. The State has acknowledged that we are tens of thousands of units short of demand and has made accelerating housing production, particularly affordable housing, a clear priority. SB 225 makes that goal harder to achieve.

Affordable housing development depends on predictability across zoning, environmental review, permitting, and financing timelines. SB 225 introduces a new interjurisdictional planning and designation framework with unclear standards, overlapping authority, and significant potential for delay. For subsidized projects, even modest delays can result in lost financing and stalled construction.

SB 225 further increases costs through the likelihood of additional studies, mitigation requirements, and time. Affordable housing cannot simply raise rents to offset these costs, meaning projects either become infeasible or require additional scarce public subsidy.

It remains unclear what problem the bill is intended to solve. Herring Run is the only body of water listed that does not already have a related designation in regulation (see COMAR 26.17.02.07), a designation for which the Maryland Department of the Environment already has a detailed process to determine.

As such, this bill appears to function as an effort to stop the creation of modest, affordable housing that BRHP supports in Towson under the guise of environmental concern. Given the Senator's very public efforts to oppose the construction of new homes for families that qualify for rental assistance, it is difficult to avoid the conclusion that SB 225 is intended to create additional obstacles for a project that has already cleared existing regulatory and environmental review. This sends a chilling signal to nonprofit partners, developers, and lenders across the State.

Taken together, these impacts undermine Maryland's housing production goals. At scale, added cost, delay, and uncertainty compound across jurisdictions and slow the delivery of housing the State has repeatedly said it needs.

For these reasons, **BRHP respectfully urges an unfavorable report on SB 225.**

Thank you for your time and consideration.

Sincerely,

Adria Crutchfield
Executive Director