

# Smarter Growth Alliance For Howard County

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October 19, 2020

The Honorable Howard County Council  
George Howard Building  
3430 Court House Drive  
Ellicott City, MD 21043

**RE: CB56-2020, Remove the Adequate Public Facilities Ordinance's exemption for Conditionally Exempt Residential Subdivision Plans**

Dear Council Members:

The Smarter Growth Alliance for Howard County is an alliance of local and state organizations working together to foster healthy, equitable and sustainable communities through smarter development and transportation decisions and improved protections for the county's natural, historic and cultural resources.

**We strongly support the intention of County Bill 56-2020 to ensure that all new residential housing be required to pass the APFO tests for allocations, public schools, and roads as a condition of approval. We believe the only exceptions from APFO tests should be solely one-time only for adding one unit to a parcel for the use of a family member.**

Howard County is at transitional point in development. There is less land available for future development, and infill and redevelopment, along with rezoning, are the most likely ways that new residential subdivisions will occur. In addition, projections for the Howard County Public School System indicate that there will be a shortfall of school availability at all levels in the next 10 years. In the rural western portion of the County, outside of the Planned Service Area (PSA) boundary for water and sewer, piecemeal development can cause a cumulative increase in traffic on rural roads with prescriptive right-of-ways that are unable to be easily widened or improved.

The development community has argued that resales add many students to our school system. Although this is not the majority source, age-restricted projects should not be exempt from the school test in APFO. Given these projects can be very large, they can certainly have an effect on school enrollment numbers due to elderly residents moving into new facilities and selling their homes, thereby creating more students who cannot be planned for in advance.

*Audubon MD-DC • Audubon Society of Central Maryland • Bicycling Advocates of Howard County  
Chesapeake Bay Foundation • Clean Water Action • Coalition for Smarter Growth • Community Ecology Institute  
Earth Forum of Howard County • HARP • Horizon Foundation • Howard County Citizens Association  
Howard County Conservancy • Howard County Sierra Club • Maryland Conservation Council  
Maryland League of Conservation Voters • Maryland Ornithological Society • Patapsco Heritage Greenway  
Preservation Maryland • Safe Skies Maryland • Savage Community Association • The People's Voice • Transition Howard County*

CB56 would require all residential development, which has the largest impact on both traffic and schools, be required to pass test for adequate road facilities and schools. This would provide data for Planning and Zoning to assess the collective increase in traffic and school fill and better manage future infrastructure requirements.

We have the opportunity to address infill and new innovative ways of restoration and redevelopment of residential subdivisions while considering impacts on traffic and schools as we work to update the General Plan. To help mitigate the issue in the interim, we ask that the Council approve CB56 and the removal of near-term residential exemptions.

Sincerely,

Howard County Citizen's Association  
Stu Kohn  
President

Safe Skies Maryland  
Mark T Southerland  
Legislative Director

Howard County Sierra Club  
Carolyn Parsa  
Chair

Savage Community Association  
Susan Garber  
Board Chair

Maryland Conservation Council  
Paulette Hammond  
President

The People's Voice  
Lisa M. Markovitz  
President

Preservation Maryland  
Elly Cowan  
Director of Advocacy

cc: The Honorable Calvin Ball, County Executive