

# Smarter Growth Alliance For Howard County

---

---

January 19, 2021

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

**RE: CB7-2021 – In TOD (Transit-Oriented Development) zone – increase building height maximum from 100' to 180'.**

Dear Council Members:

The Smarter Growth Alliance for Howard County (SGAHC) 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.

**While we believe that CB7 seeks to address the County's desire for transit-oriented development (TOD), the legislation as written raises a number of serious questions and concerns. As such, SGAHC opposes CB7 until those issues are addressed appropriately.**

*Is there adequate fire equipment to service this high structure that would exceed any current Howard County building height? If not, SGACC requests that the legislation include a provision that any such developments should be required to provide any new equipment or staffing needed for fire safety.*

*How will this affect the TOD zone criteria elsewhere?*

*Would the parking structure of any resulting building be located within the building space, or would it increase impervious surface outside?*

*How are residents in any resulting projects accessing the MARC? Are sidewalks or bike lanes going to be required to make MARC fully accessible? Proximity to transit does not necessarily make new development transit oriented. While higher residential density projects in areas near a MARC Station are a goal for smart growth, we would like to assure this is the actual case for every future project that would be subject to the new height limit and to verify that accessibility to the MARC is addressed. We would request that transit accessibility be a part of any development proposals resulting from this legislation.*

*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 • 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*

Howard County is currently working diligently on an update to the General Plan. Is now the time to legislate an increase height allowances of this magnitude, an 80% change? Indeed, at the minimum, there is the need to address implications on the Route 32 traffic and work plans. Additionally, the effect that nearly doubling of density in a very localized area is going to have on school capacity needs to be taken into serious consideration since the notion that apartments do not produce students is unsound.

SGAHC believes that this legislation should not be rushed through and suggest that the proposed height restriction increase surrounding MARC stations be addressed and vetted in the upcoming General Plan and Complete Streets reviews, so there is an opportunity for more public input and to allow for concerns such as those we have enumerated to be addressed. Indeed, as it is written, this legislation would prevent usual public input processes by not requiring a pre-submission community meeting due to its source from a ZRA, despite clearly affecting a distinct, limited area and number of projects.

We greatly appreciate your attention to these concerns, and we look forward to working with the County to address these issues in any way we can. Thank you.

Sincerely,

Bicycling Advocates of Howard County

Jack Guarneri

President

Clean Water Action

Emily Ranson

Maryland Director

Howard County Citizen's Association

Stu Kohn

President

Howard County Sierra Club

Carolyn Parsa

Chair

Preservation Maryland

Elly Cowan

Director of Advocacy

Savage Community Association

Susan Garber

Board Chair

The People's Voice

Lisa M. Markovitz

President

cc: The Honorable Calvin Ball, County Executive