

October 19, 2020

**Re: OPPOSITION TO CB56 – APFO Retesting**

Dear Chairwoman Mercer Rigby and Members of the Howard County Council:

The Howard County Chapter of the Maryland Building Industry Association (MBIA) writes in opposition to Council Bill 56, which would remove the Adequate Public Facilities Ordinance (APFO) exemption for Conditionally Exempt Residential Subdivision Plans.

This legislation could delay residential subdivision plans that are currently exempt from APFO's testing requirements, which would result in deferred or lost tax revenue for the County. Development is an economic driver; it brings jobs, encourages home-buying, contributes to the county's budget, and strengthens the county's tax base. But businesses need predictability and transparency from government in order to be successful and keep costs low for consumers. This bill would change the rules once substantial investments have already been made, which is unfair for developers and runs contrary to the best interests of businesses and the County.

For these reasons, MBIA respectfully requests the Council vote against Council Bill 56-2020. Thank you for your attention to this vital issue and your continued support of the local home building industry. If you have any questions about these comments and would like to discuss MBIA's position further, please do not hesitate to contact me at [abailey@marylandbuilders.org](mailto:abailey@marylandbuilders.org) or (202) 815-4445.

Best regards,



Angelica Bailey, Esq., Vice President of Government Affairs

Cc: Councilman Opel Jones  
Councilmember Deb Jung  
Councilman David Yungmann

County Executive Calvin Ball  
Sameer Sidh, Chief of Staff to the County Executive  
Councilmember Elizabeth Walsh