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May 20, 2025

Howard County APFO Review Committee

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3430 Court House Drive

Ellicott City, MD 21043

**RE: Baltimore Regional Housing Partnership Comments in Support of APFO Reform to Advance Affordable Housing**

Dear Howard County APFO Review Committee Members:

Thank you for the opportunity to submit comments on behalf of the Baltimore Regional Housing Partnership (BRHP) in support of reform to the county Adequate Public Facilities Ordinance (APFO) that will ease and incentivize investment in affordable housing construction in Howard County. As the administrators of the Baltimore Housing Mobility Program, BRHP provides over 4,300 low-income families rental assistance in the form of Housing Choice Vouchers coupled with counseling support as they move from areas of concentrated poverty to areas of opportunity in Baltimore City and the five surrounding counties, including Howard County.

Our mandate is to remedy the harm caused by decades of public disinvestment in low-income communities by working to expand housing choices and opportunities for families with limited means who have historically been excluded from housing in resource-rich neighborhoods. Many of the families in our program call Howard County home because of its best-in-state school system, public amenities and proximity to major employers.

**We urge the Howard County APFO Review Committee to recommend to the County Council adoption of an Adequate Public Facilities Ordinance that proactively supports the production of more affordable housing in order to serve the needs of**

**county residents and align with the HoCo By Design General Plan and the county's long-term goals for economic growth.**

Howard County is facing a severe housing affordability crisis driven by a shortage of available housing. Housing costs have become increasingly out of reach for moderate and low-income workers, including educators, healthcare aides, retail employees, and other essential members of the local workforce.

In order to help address this, the [HoCo By Design General Plan](#) sets forth a goal of 31,000 new homes constructed by 2040 – including 340 new affordable homes constructed annually. To meet this target, Howard County must remove regulatory barriers that delay or deter housing development, particularly for affordable housing. Unfortunately, the current structure of APFO has had the opposite effect, particularly in the implementation of the school capacity test.

Amendments to the school capacity test in 2019 to make it more restrictive have had a chilling effect on new development. [According to data from the Department of Planning and Zoning](#), since 2018, all APFO housing development delays have been caused by the required school capacity test rather than by limitations set to housing allocations. The [Howard County Spending Affordability Advisory Report for Fiscal Year 2025](#) further affirms the issue for new development, “With the combined influences of development-policy changes (Adequate Public Facilities Ordinance limitations “APFO”, Impact Fees, etc.), a shortage of developable land, economic uncertainty, and increasing interest rates, housing permitting activities fell to a new low in 2022 of 534 permits – the lowest level of permitting activity in recent history.” **As a result of these restrictions, developers are delivering fewer than 1,000 new homes per year – well below the rate needed to meet the HoCo by Design goal and current demand.**

While some may claim that this lack of new housing is a positive thing if it prevents school overcrowding, policies that restrict new housing development in the name of school capacity are not grounded in actual enrollment drivers. [According to the HCPSS Office of School Planning](#), existing home turnover from renters and resales accounts for the majority (83%) of new HCPSS students, while new home construction contributes just 17%. Meanwhile, enrollment in HCPSS has declined from

its peak in 2019–2020 and is projected to remain below capacity systemwide for the next several years, indicating that ongoing efforts to employ targeted redistricting in addition to targeted school expansion could resolve overcrowding where it exists.

Conversely, according to data in the [2024 Howard County Rental Survey](#), rental housing demand continues to rise. Nearly 30% of Howard County households are renters, and renters are expected to account for 59% of the county's household growth over the next five years. In areas like Columbia, rental growth will account for 100% of net household growth. Yet the supply of new affordable rental units is not keeping pace.

Affordable rental units are woefully underrepresented in the county. The Rental Survey found that Howard County currently has only 56% of the affordable units needed for households with incomes below \$50,000, and only 47% for households below \$60,000 – that amounts to thousands of our friends, family members, and neighbors ignored and underserved in the search for stable housing in the county.

Overall, these facts point to a growing mismatch between affordable housing demand and supply in Howard County, which the APFO, as currently structured, is making harder to fix. We applaud the review committee's recognition of the need to overhaul the current APFO school capacity test, in light of these issues, and we support a reformed APFO that aligns with the HoCo By Design General Plan and proactively advances affordable housing development in the following ways:

1. If the review committee recommends the proposed Unit Premium Payment (UPP) system in lieu of the school capacity test, it should be designed with provisions to actively incentivize affordable housing, such as:
  - Offering lower UPP rates for new rental developments where at least 25% of units are affordable to households at or below 60% AMI.
  - Offering reduced or no premium fees for affordable housing near transit or in designated growth areas, such as Activity Centers identified in HoCo By Design.
  - Requiring lower UPP fees for developments with larger, multi-bedroom affordable units, better suited to meet family needs.

2. Exceptions or lower payment requirements for affordable housing in the APFO should be provided by right without a waiver process to avoid delay, encourage investment and remove unnecessary administrative burdens.

Inclusionary programs like the Moderate-Income Housing Unit Program are an essential baseline, but the county needs policies that reward going beyond these minimums. New residential development grows the tax base, increases income and property tax revenues, and helps sustain high-quality county services. Restricting housing development hurts long-term economic sustainability at the same time it disenfranchises families and reinforces an unfair system of haves and have-nots.

A modernized APFO should be a tool for inclusive growth, not an obstacle to it. We urge you to embrace reforms that make it easier to build affordable homes in Howard County.

Thank you for your time and commitment to a more equitable Howard County.

Sincerely,

Adria Crutchfield  
Executive Director