



BALTIMORE CITY COUNCIL LAND USE & TRANSPORTATION COMMITTEE

Mission Statement

On behalf of the Citizens of Baltimore City, the Land Use & Transportation Committee is committed to shaping a reliable, equitable, and sustainable future for Baltimore's land use and transportation systems. Through operational oversight and legislative action, the committee aims to develop and support lasting solutions grounded in principles of good governance.

The Honorable Ryan Dorsey

CHAIR

PUBLIC HEARING

2/12/2026

9:00 AM

CLARENCE "DU" BURNS COUNCIL CHAMBERS

25-0066

Housing Options and Opportunities

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Staff: Ethan Navarre (Ethan.Navarre@baltimorecity.gov)



Meeting: Bill Hearing

Committee: Land Use & Transportation

Bill # 25-0066

Title: Housing Options & Opportunity

Purpose: FOR the purpose of amending certain provisions of the Baltimore City Zoning Code to promote increased development of low-density multi-family dwellings in certain residential districts; striking residential conversion standards for single-family dwellings into multi-family dwellings; amending certain permitted and conditional uses; amending certain bulk and yard standards; and defining certain terms.

REPORTING AGENCIES

Agency	Report
Department of Law	Approve for form & sufficiency
Department of Planning	Approved with Amendments
Board of Municipal & Zoning Appeals	Recommend Approval
Department of Transportation	Favorable
Department of Housing & Community Development	Favorable
Department of Finance	Does not oppose

BACKGROUND

Housing in Baltimore City

Baltimore is a city where many residents rent. According to the US Census Bureau, the population of Baltimore is approximately 568,271 residents (as of March 2025)¹ According to the Housing Indicator Tool website, approximately 52% (as of 2023) of that population rents their living accommodation.² Renters tend to be younger, as the national average age of a 1st time home buyer is 40 years old.³

As a state, Maryland needs more housing units for renters, particularly for low-income residents – according to the Maryland Housing Needs Assessment, the State is missing 85,000

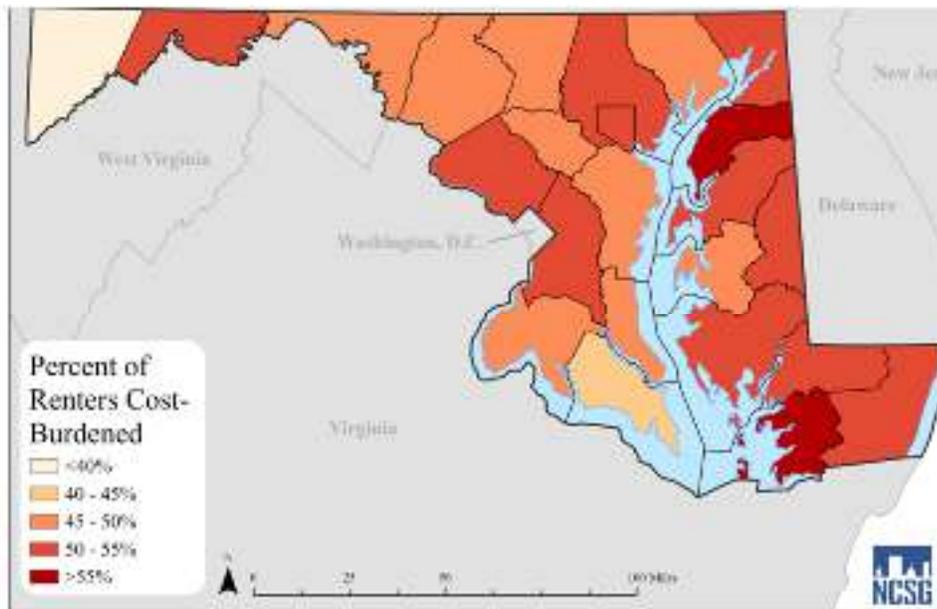
¹ Mayoral Announcement

² Housing Indicator Tool (based on 2023 US Census Data)

³ NPR

rental housing units for renters at 0-30% of AMI, and over 30,000 housing units for renters at 0-50% of AMI.⁴

Rent can account for a substantial portion of an individual's or family's income. According to reporting in the Baltimore Banner, 4 out of 10 Baltimore residents who rent are spending 35% or more of their income on housing. A person is considered cost-burdened if they pay 30% or more of their income on housing.⁵ This is confirmed by the 2025 update to the 2020 Maryland Housing Needs Assessment, which also concluded that a significant number of Baltimore residents who rent are cost-burdened. That same study also found that the average income of renters has declined by 1.1% across the state and that the most cost-burdened groups broke out across racial groups, with Black & Pacific Islander Marylanders being the most cost-burdened groups in the City.⁶



History of conversions

According to the Planning Department's report, the prohibition on converting single-family dwellings into multifamily dwelling units was enacted in 1999 for R6 and less-dense residential areas. It also required approval by the BMZA for conversions in more dense areas of the City. The process has changed over the years, allowing for conversions to happen by ordinance instead of board approval⁷.

⁴ 2025 Maryland Housing Assessment Update

⁵ Baltimore Banner

⁶ 2025 Maryland Housing Assessment Update

⁷ Planning Dept Report

Overview of 25-0066

This bill, if enacted, would:

- Create a new definition for *Dwelling: Multi-family (Low Density)*. Allowed in all residential districts in Table 8-301
 - A dwelling that contains at least 2 but no more than 4 dwelling units (except as provided in the subsection in the zoning code)
 - Includes common facilities for residents, such as laundry rooms
- Table 8-401 describes the bulk and yard requirements for detached and semi-detached dwellings, and 25-0066 would include *Dwelling multifamily low-density* to those requirements, meaning that in areas where a detached or semi-detached dwelling would be permitted, then the multifamily low-density would be as well by right.
 - Under the current provisions of the zoning code, converting a single-family unit is restricted to those residential districts such as R7, & R8 and requires an ordinance.
- Table 8-401 would also include gross floor area requirements for this definition. This may not include any basement area
 - 2 units – 1500 SQ FT
 - 3 units – 2,250 SQ FT
 - 4 units – 3,000 SQ FT
- Table 9-301 would show *dwelling multifamily low-density* as permitted uses for R5-R8 zones for Rowhouse & Multi-Family Residential Districts
- Table 9-401 describes the bulk and yard regulations for Rowhouse & Multi-Family Residential Districts and
 - Describes the lot area for the *dwelling multifamily low-density* use in these areas
 - Gross floor areas (same as the ones for detached or semi-detached dwellings)
- Detached Dwelling - means a dwelling that contains a single dwelling unit and is not attached to any other dwelling.
- Semi-detached Dwelling - means 1 of 2 buildings, each of which contains a single dwelling unit used for residential occupancy, with each building having its own private entrance and being joined to the other by a party or shared wall and not otherwise attached to any other dwelling
- Rowhouse - means 1 of 3 or more buildings, each of which contains a single dwelling unit used for residential occupancy, with each building having its own private entrance and being joined to the others by a party or shared wall.
- Multi-Family Dwelling - means a dwelling that contains 2 or more dwelling units.

Both the Departments of Planning and Finance note that with the passage of other bills such as 25-0065 (Zoning – Eliminating Off Street Parking Regulations), & 25-0064 (Zoning – Bulk & Yard Requirements – Amendments) 25-0065 would allow those wishing to convert their

homes into multifamily properties to do so without many of the needed variances that often accompany a conversion i.e. a bulk & yard variance or an off street parking variance. The Planning Commission, in its memo, notes the need for an amendment to gather data regarding the implementation of Council Bill 25-0066, including:

- The number of structures which have been constructed or converted under this Ordinance
- The number of dwelling units each structure contains
- The gross floor area of each dwelling unit
- The zoning district and neighborhood in which each structure is located,
- The affordability of these units.

ADDITIONAL INFORMATION

Fiscal Note:

The Department of Finance, in its report, notes limited short-term gains in terms of revenue for the City. However, the department also notes that the long-term benefits of the flexibility of housing types that 25-0066 offers would be substantial. Its study looked mostly at properties in disinvested communities on the west side of the City. The Department of Finance expects that the primary driver of short-term revenue would be property taxes, which would be the result of increased value from properties converted due to physical improvements.

As noted in the Department of Finance’s report, it is difficult to draw conclusions about the potential revenue generated long-term from diversifying the housing stock of the City. However, there are numerous benefits – including reducing housing cost, shortening timelines to bring new units online, and making more efficient use of the City’s existing infrastructure.

Beyond these noted potential long-term benefits, if the population of the City were to realize additional gains, there may be additional benefits from a larger population living in the City, supporting businesses, and taking advantage of services in Baltimore. These benefits are not possible to quantify without knowing more about potential incoming residents and what their needs and habits might be.

Information Source(s):

- Council Bill 25-0066 1st reader & agency reports
- 2025 Update – Maryland Housing Needs Assessment
<https://dhcd.maryland.gov/Documents/Research/Housing-Needs-Assessment/Report-2-v0627-SHNA-2025.pdf>

- Baltimore Banner *“Rent is guzzling Baltimore paychecks. The poorest feel it the most.”*
<https://www.thebanner.com/community/housing/baltimore-rent-housing-costs-census-IAPXOCULORGDLMAMULBE3PYLIU/>
 - NPR *“Many would-be buyers are frozen out of the housing market”*.
<https://www.npr.org/2025/11/09/nx-s1-5600733/many-would-be-buyers-are-frozen-out-of-the-housing-market>
 - *Mayor Scott on New Census Projections Showing Stabilizing Population*
<https://mayor.baltimorecity.gov/news/press-releases/2025-03-13-mayor-scott-new-census-projections-showing-stabilizing-population>
 - Housing Indicator Tool (supported by Urban Institute & HAND)
<https://hit.housingand.org/jurisdictions/baltimorecity>
-

Analysis by: Tony Leva
Analysis Date:11/14/2025

Direct Inquiries to: Anthony.Leva@BaltimoreCity.Gov

CITY OF BALTIMORE
COUNCIL BILL 25-0066
(First Reader)

Introduced by: The Council President
Cosponsored by: Councilmembers Dorsey, Gray, and Blanchard
At the request of: The Administration
Introduced and read first time: May 12, 2025
Assigned to: Land Use and Transportation Committee

REFERRED TO THE FOLLOWING AGENCIES: City Solicitor, Department of Finance, Department of Housing and Community Development, Planning Commission, Board of Municipal and Zoning Appeals, Department of Transportation

A BILL ENTITLED

1 AN ORDINANCE concerning

2 **Zoning – Housing Options and Opportunity**

3 FOR the purpose of amending certain provisions of the Baltimore City Zoning Code to promote
4 increased development of low-density multi-family dwellings in certain residential districts;
5 striking residential conversion standards for single-family dwellings into multi-family
6 dwellings; amending certain permitted and conditional uses; amending certain bulk and yard
7 standards; and defining certain terms.

8 BY repealing and reordaining, with amendments

9 Article 32 - Zoning
10 Section 8-201, Table 8-301, Table 8-401, Table 9-301, Table 9-401, and
11 Table 12-301
12 Baltimore City Code
13 (Edition 2000)

14 BY adding

15 Article 32 - Zoning
16 Sections 1-305(r) and 1-309(i)
17 Baltimore City Code
18 (Edition 2000)

19 BY re-numbering current

20 Article 32 - Zoning
21 Sections 1-305(r) through (cc), respectively, to be Sections 1-305(s) through (dd),
22 respectively, Sections 1-309(i) through (v), respectively, to be Sections 1-309(j) through
23 1-309(w), respectively, and Sections 4-405(a)(6) through 4-405(a)(16), respectively, to be
24 Sections 4-405(a)(5) through 4-405(a)(15), respectively
25 Baltimore City Code
26 (Edition 2000)

EXPLANATION: CAPITALS indicate matter added to existing law.
[Brackets] indicate matter deleted from existing law.

Council Bill 25-0066

1 BY repealing
2 Article 32 - Zoning
3 Sections 4-405(a)(5), 9-701 through 9-703, the subtitle designation,
4 “Subtitle 7. Residential Conversions”, and Sections 10-609 and 12-303(i)
5 Baltimore City Code
6 (Edition 2000)

7 **SECTION 1. BE IT ORDAINED BY THE MAYOR AND CITY COUNCIL OF BALTIMORE**, That
8 Sections 9-701 through 9-703, the subtitle designation, “Subtitle 7. Residential Conversions”,
9 and Sections 10-609 and 12-303(i) of Article 32 – Zoning of the Baltimore City Code be
10 repealed.

11 **SECTION 2. BE IT ORDAINED BY THE MAYOR AND CITY COUNCIL OF BALTIMORE**, That the
12 Laws of Baltimore City read as follows:

13 **Baltimore City Code**

14 **Article 32. Zoning**

15 **Title 1. General Provisions**

16 *Subtitle 3. Definitions*

17 **§ 1-305. “Day-care home: Adult” to “Electric substation: Outdoor”.**

18 (R) *DWELLING: MULTI-FAMILY (LOW DENSITY).*

19 (1) *IN GENERAL.*

20 “DWELLING: MULTI-FAMILY (LOW DENSITY)” MEANS A DWELLING THAT
21 CONTAINS AT LEAST 2 BUT NO MORE THAN 4 DWELLING UNITS, EXCEPT AS
22 OTHERWISE PROVIDED IN PARAGRAPH (2) OF THIS SUBSECTION.

23 (2) *INCLUSIONS.*

24 “DWELLING: MULTI-FAMILY (LOW DENSITY)” INCLUDES COMMON FACILITIES FOR
25 RESIDENTS, SUCH AS LAUNDRY ROOMS.

26 **§ 1-309. “Lot line” to “Motel”.**

27 (I) *LOW-DENSITY MULTI-FAMILY DWELLING.*

28 *SEE “DWELLING: MULTI-FAMILY (LOW DENSITY)”.*

Council Bill 25-0066

Title 4. Development Reviews

Subtitle 4. Design Review

§ 4-405. Applicability.

(a) *In general.*

Except as provided in subsection (b) of this section, design review is required for the following types of development:

[(5) when exterior modifications are proposed for residential conversion in the R-7, R-8, R-9, and R-10 Districts;]

...

Title 8. Detached and Semi-Detached Residential Districts

Subtitle 2. District Descriptions

§ 8-201. Common standards.

[(a) *Residential development.*]

In the districts described in this subtitle, residential development is limited to EITHER 1 single-family dwelling unit per lot OR 1 LOW-DENSITY MULTI-FAMILY DWELLING.

[(b) *Residential conversions.*]

[In any of the districts subject to this title, the conversion of a single-family dwelling to a multi-family dwelling is prohibited.]

Council Bill 25-0066

Zoning Tables

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**Table 8-301: Detached and Semi-Detached Residential Districts –
Permitted and Conditional Uses**

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Uses	Districts									Use Standards
	R-1A	R-1B	R-1C	R-1D	R-1E	R-1	R-2	R-3	R-4	
Residential										
...										
DWELLING: MULTI-FAMILY (LOW DENSITY)	P	P	P	P	P	P	P	P	P	
...										

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**Table 8-401: Detached and Semi-Detached Residential Districts –
Bulk and Yard Regulations**

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Categories	Specifications (Per District)								
	R-1A	R-1B	R-1C	R-1D	R-1E	R-1	R-2	R-3	R-4
Minimum Lot Area									
...									
Dwelling: Detached, [or] Semi-Detached, OR MULTI-FAMILY (LOW DENSITY)	2 acres	1 acre	21,780 sq. ft.	14,520 sq. ft.	9,000 sq. ft.	7,300 sq.ft.	5,000 sq. ft.	5,000 sq. ft.	3,000 sq. ft.
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MINIMUM ENCLOSED GROSS FLOOR AREA ³

DWELLING: MULTI-FAMILY (LOW DENSITY)	2-UNIT: 1,500 SQ. FT.								
	3-UNIT: 2,250 SQ. FT.								
	4-UNIT: 3,000 SQ. FT.								
...									

³ GROSS FLOOR AREA MAY NOT INCLUDE ANY BASEMENT AREA.

**Table 9-301: Rowhouse and Multi-Family Residential Districts –
Permitted and Conditional Uses**

Uses	Districts						Use Standards
	R-5	R-6	R-7	R-8	R-9	R-10	
Residential							
...							
DWELLING: MULTI-FAMILY (LOW DENSITY)	P	P	P	P			
...							

**Table 9-401: Rowhouse and Multi-Family Residential Districts –
Bulk and Yard Regulations**

Categories	Specifications (Per District)					
	R-5	R-6	R-7	R-8	R-9	R-10
Minimum Lot Area						
...						
Dwelling: Rowhouse OR MULTI-FAMILY (LOW DENSITY)	2,500 sq. ft.	1,500 sq. ft.	1,100 sq. ft.	750 sq. ft.	750 sq. ft.	500 sq. ft.

Council Bill 25-0066

	R-5	R-6	R-7	R-8	R-9	R-10
1 ...						
2	MINIMUM ENCLOSED GROSS FLOOR AREA ⁸					
3 4 5 6 7 8 9	DWELLING: MULTI-FAMILY (LOW DENSITY)	2-UNIT: 1,500 SQ. FT. 3-UNIT: 2,250 SQ. FT. 4-UNIT: 3,000 SQ. FT.				
10	Maximum Bldg Height					
11 12 13 14 15 16	...					
	Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)	35 or 45 feet ²	35 or 45 feet ²	35 or 45 feet ²	45 or 60 feet ³	3.0 FAR 6.0 FAR
17	Maximum Lot Coverage					
18 19 20 21 22 23	...					
	Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)	40%	45%	70%	80%	40% 80%
24	Maximum Impervious Surface					
25 26 27 28 29 30 31	Dwelling: Detached [or], Semi-Detached, OR MULTI-FAMILY (LOW DENSITY)	60%	60%	60%	60%	60%
32	Minimum Front Yard					
33 34 35 36 37 38	...					
	Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)	25 feet	20 feet	10 feet	None	45 or 65 feet ⁶ None
	...					

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	R-5	R-6	R-7	R-8	R-9	R-10
Minimum Interior-Side Yard						
...						
Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)	15 feet	15 feet	10 feet	10 feet	10 feet	10 feet
...						
Minimum Corner-Side Yard						
...						
Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)	20 feet	20 feet	15 feet	None	25 feet	None
...						
Minimum Rear Yard						
...						
Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)	25 feet	25 feet	25 feet	25 feet	10 feet	10 feet
...						
...						
² For a structure located on an interior lot, the maximum height is 35 feet. For a structure located on a corner lot at which each of the adjoining street rights-of-way are at least 30 feet wide, the maximum height is 45 feet.						
³ For a structure located on an interior lot, the maximum height is 45 feet. For a structure located on a corner lot at which each of the adjoining street rights-of-way are at least 30 feet wide, the Zoning Board may allow a height of up to 60 feet as a conditional use.						
...						
⁶ For a structure that comprises 6 or fewer stories, the minimum front-yard requirement is 45 feet. For a structure that comprises 7 or more stories, the minimum front-yard requirement is 65 feet. However, a structure designed with a courtyard is allowed a reduction of the minimum front-yard requirement, as provided in § 9-403 {"Setback reduction for courtyard design"}.						
...						
⁸ GROSS FLOOR AREA MAY NOT INCLUDE ANY BASEMENT AREA.						

Council Bill 25-0066

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<i>Table 12-301: Office-Residential Districts – Permitted and Conditional Uses</i>		
Uses	Districts	Use Standards
	OR	
Residential		
Bed and Breakfast	CB	
Day-Care Home: Adult or Child	P	Per § 14-310
Dwelling: Detached	P	
Dwelling: Semi-Detached	P	
Dwelling: Multi-Family	P	Per § 14-327
DWELLING: MULTI-FAMILY (LOW DENSITY)	P	
Dwelling: Rowhouse	P	
Fraternity or Sorority House	CO	Per § 14-313
Residential-Care Facility (16 or Fewer Residents)	P	Per § 14-334
Residential-Care Facility (17 or More Residents)	CO	Per § 14-334
Rooming House	CO	

SECTION 3. AND BE IT FURTHER ORDAINED, That this Ordinance takes effect on the 30th day after the date it is enacted.

BALTIMORE CITY COUNCIL

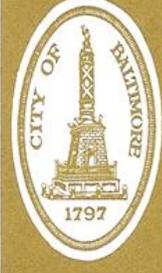


LAND USE & TRANSPORTATION COMMITTEE

25-0066

Housing Options and Opportunities

Agency Reports

FROM	NAME & TITLE	Eric W. Tiso,  Director of Development Oversight and Project Support	CITY of BALTIMORE MEMO	
	AGENCY NAME & ADDRESS	Department of Planning 8 th Floor, 417 East Fayette Street		
	SUBJECT	City Council Bill #25-0066 / Zoning – Housing Options and Opportunity		

DATE: November 4, 2025

TO The Honorable President and
Members of the City Council
City Hall, Room 400
100 North Holliday Street

At its regular meeting of October 30, 2025, the Planning Commission considered City Council Bill #25-0066, for the purpose of amending certain provisions of the Baltimore City Zoning Code to promote increased development of low-density multi-family dwellings in certain residential districts; striking residential conversion standards for single-family dwellings into multi-family dwellings; amending certain permitted and conditional uses; amending certain bulk and yard standards; and defining certain terms.

In its consideration of this Bill, the Planning Commission reviewed the attached staff report, which recommended approval of City Council Bill #25-0066 and adopted the following resolution:

RESOLVED, That the Planning Commission concurs with the recommendation of its departmental staff, adopts the findings and equity analysis outlined in the staff report, with consideration for testimony and facts presented in the meeting, and recommends that City Council Bill #25-0066 be **amended and approved** by the City Council, with the following amendment:

Within three years of the effective date of this Ordinance, and within every three years thereafter, the Director of Planning and Planning Commission shall conduct and present to the Mayor and City Council an evaluation of the effectiveness of this Ordinance and recommend its continuance, modification, or termination. The evaluation report shall include, but need not be limited to, the number of structures which have been constructed or converted under this Ordinance, the number of dwelling units each structure contains, the gross floor area of each dwelling unit, the zoning district and neighborhood in which each structure is located, and affordability of these units. The Department of Housing and Community Development and the Department of Planning shall ensure that such data is collected to permit production and delivery of the required report.

If you have any questions, please contact me at eric.tiso@baltimorecity.gov or by phone at 410-396-8358.

attachment

cc: Ms. Nina Themelis, Mayor's Office
The Honorable John Bullock, Council Rep. to Planning Commission
Mr. Justin Williams, BMZA
Mr. Geoffrey Veale, Zoning Administrator
Ms. Stephanie Murdock, DHCD
Ms. Hilary Ruley, Law Dept.
Mr. Francis Burnszynski, PABC
Mr. Luciano Diaz, DOT
Ms. Nancy Mead, Council Services



Brandon M. Scott
Mayor

PLANNING COMMISSION

Jon Laria, Chair; Eric Stephenson, Vice Chair

STAFF REPORT



Tim Keane
Director

October 30, 2025

LEGISLATION: City Council Bill #25-0066/ Zoning – Housing Options and Opportunity: For the purpose of amending certain provisions of the Baltimore City Zoning Code to promote increased development of low-density multi-family dwellings in certain residential districts; striking residential conversion standards for single-family dwellings into multi-family dwellings; amending certain permitted and conditional uses; amending certain bulk and yard standards; and defining certain terms.

SUMMARY OF REQUEST: This bill is an amendment to Article 32 – *Zoning* that will create and defines “*Dwelling: Multi-Family (Low Density)*” as a new land use, adds that new use to Use Tables 8-301, 9-301, and 12-301, and adds the new use to Bulk and Yard Tables 8-401 and 9-401). Finally, the bill removes conversions of dwellings as a process.

RECOMMENDATION: Approval

STAFF: Eric Tiso

INTRODUCED BY: The Council President (on behalf of the Administration)

OWNER: Multiple

COUNCIL DISTRICT: Citywide

HISTORY

- Elements of this concept were included in CCB #22-0285 - Abundant Housing Act, which was not adopted in the last Council session.
- Companion bills include:
 - CCB #25-0062 – Building Code – Single Exit from Residential Occupancy
 - CCB #25-0063 – Zoning Administrator – Transfer to Department of Planning
 - CCB #25-0064 – Zoning – Bulk and Yard Requirements – Amendments
 - CCB #25-0065 – Zoning – Eliminating Off-Street Parking Requirements

CONFORMITY TO PLANS

The 2024 Comprehensive Master Plan for the City of Baltimore was enacted by Ordinance #24-426, dated December 2, 2024. This bill will support the Plan’s goals for Equitable Housing, by creating the option to create additional dwelling units that are not currently available, and have a higher likelihood of being affordable, relative to existing residential developments.

APPLICANT’S PROPOSAL AND CODE CONTEXT:

The Administration requested introduction of this bill to lower the cost of housing in Baltimore by expanding access to multi-family homes. By creating a new land use category of “*Dwelling: Multi-Family (Low Density)*,” it will be possible to build multi-family housing that the zoning code has previously prohibited in certain districts, thereby expanding housing options in those existing lower-density neighborhoods. This bill has companion bills including CCB #25-0064, and CCB #25-0065 that will potentially impact development options as a result of this bill.

PROPOSED USE:

This bill creates a new land use of “*Dwelling: Multi-Family (Low Density)*” by inserting a new § 1-305(r), and then re-numbering the current § 1-305(r) through (cc), respectively. The new definition is proposed as:

§ 1-305. "Day-care home: Adult" to "Electric substation: Outdoor".

...

(R) *DWELLING: MULTI-FAMILY (LOW DENSITY)*.

(1) *IN GENERAL.*

“DWELLING: MULTI-FAMILY (LOW DENSITY)” MEANS A DWELLING THAT CONTAINS AT LEAST 2 BUT NO MORE THAN 4 DWELLING UNITS, EXCEPT AS OTHERWISE PROVIDED IN PARAGRAPH (2) OF THIS SUBSECTION.

(2) *INCLUSIONS.*

“DWELLING: MULTI-FAMILY (LOW DENSITY)” INCLUDES COMMON FACILITIES FOR RESIDENTS, SUCH AS LAUNDRY ROOMS.

For convenience, the bill adds a new cross-reference to aid the reader in finding this newly created use. The new § 1-309(i) is proposed as:

§ 1-309. “Lot line” to “Motel”.

(I) *LOW-DENSITY MULTI-FAMILY DWELLING.*

SEE “DWELLING: MULTI-FAMILY (LOW DENSITY)”.

The District Descriptions in Title 8, Subtitle 2 are amended as shown below to describe the lowest-density residential districts (R-1A through R-4) as intended for either a single-family dwelling, or for one *Low-Density Multi-Family Dwelling*. This bill also strikes paragraph (b) that currently prohibits conversions of dwellings. Staff notes that multi-family dwellings (i.e. those with more than four dwelling units) are not allowed in these zones, as they’re not included in Table 8-301, so only single-family dwellings or the new *Low-Density Multi-Family Dwellings* will be generally allowed.

§ 8-201. Common standards.

[(a) *Residential development.*]

In the districts described in this subtitle, residential development is limited to EITHER 1 single-family dwelling unit per lot OR 1 LOW-DENSITY MULTI-FAMILY DWELLING.

[(b) *Residential conversions.*]

[In any of the districts subject to this title, the conversion of a single-family dwelling to a multi-family dwelling is prohibited.]

AMENDMENTS TO TABLES:

This bill amends Table 8-301 by adding *Dwelling: Multi-Family (Low Density)* to the table as a permitted use (i.e. by-right) in each of the zones R-1A through R-4. Table 8-401 is amended to

add “, OR MULTI-FAMILY (LOW DENSITY)” to the Dwelling: Detached, or Semi-Detached line, which assigns the same lot area requirement for the new *Dwelling: Multi-Family (Low Density)* as for Dwelling: Detached, or Semi-Detached units. The table is further amended to add a new line entry for “Minimum Enclosed Gross Floor Area” that will set interior floor space requirements for two-, three-, and four-unit dwellings, as the case may be. A new footnote 3 to the table notes that gross floor area calculation for the proposed number of units may not include any basement area.

Similarly, Table 9-301 is amended to add a line for *Dwelling: Multi-Family (Low Density)*, as permitted (*i.e.* by-right) in the R-5 through R-8 zones, but not including the R-9 and R-10 zones. Table 9-401 is amended to add “OR MULTI-FAMILY (LOW DENSITY)” to the Dwelling: Rowhouse line, which assigns the same lot area requirement for the new Dwelling: Multi-Family (Low Density) as for Dwelling: Rowhouse. The table is further amended to add a new line entry for “Minimum Enclosed Gross Floor Area” that will set interior floor space requirements for two-, three-, and four-unit dwellings, for the R-5 through R-8 zones. A new footnote 8 is included that notes that gross floor area calculation for the proposed number of units may not include any basement area. The lines for Maximum building height, Maximum Lot Coverage, Maximum Impervious Surface, and each of the lines for required yards are amended to add “OR MULTI-FAMILY (LOW DENSITY)” to each line, treating them the same as for Dwelling: Multi-Family in the existing table.

Table 12-301 is amended to add a line for Dwelling: Multi-Family (Low Density), as permitted (*i.e.* by-right) in the Office-Residential Districts (OR). Staff notes that a matching amendment to Table 12-302 is not necessary, as the new use will be included with the existing lines for “All Other Uses”.

CONVERSIONS OF DWELLINGS:

A Brief History: The Zoning Code for the City was created in 1931 and has had relatively few major revisions since that time. There was a major reform in 1971 that converted the Zoning Code into a more modern Euclidean-style code. A 1999 reformatting of the Zoning Code was done to change the code’s format, but didn’t affect the contents of the code significantly. Then, most recently in 2017 (TransForm Baltimore), the Zoning Code was completely re-written to include tables, improve readability to the average citizen, included general land uses, and worked to “right size” the bulk and yard requirements to current needs.

- Ordinance #99-425, adopted May 24, 1999 changed the Zoning Code of the time to prohibit the conversion of dwellings in the R-6 and less dense zones, and to require a conditional use approval through the BMZA in the more dense residential zones. The recitals of the Ordinance provided the rationale of that time for why this change was being made:

“The City’s stated purpose in establishing its residential zoning districts is to “meet the housing needs of the city’s present and future population and to promote the stability and desirability of residential areas”.

The conversion of single- and two-family dwellings contributes to the destabilization of a neighborhood, however, by bringing in more people, increasing congestion and raising the demand for parking.

Because the City’s population has been declining, no demand for additional dwellings exists, and the creation of additional dwellings in one neighborhood will create vacancies in other neighborhoods.

Prohibiting the conversion of dwellings in the lower density residential districts will contribute to the stability of those districts and to the stability of all of the City's neighborhoods.”

Staff sees that the Council of that time took notice of the declining population in the City, but it is clear that the belief was that there would be no (or negligible) net in-migration to the City, and so any conversions approved could only have a parasitic effect on the housing market within the City – meaning that those choosing to move into a newly converted unit would not then be moving into a regular single-family dwelling elsewhere in the City, thereby leaving a vacant unit. With the benefit of hindsight, we don't believe those assumptions were necessarily correct. That Ordinance appears to overlook the need for affordable housing, and it doesn't recognize the cost difference between a single-family dwelling compared to a newly converted unit in a multi-family building.

- Ordinance #11-525, adopted November 22, 2011, changed the approval path for conversions in the R-8 zone from the BMZA to an Ordinance process, requiring a legislative authorization instead.
- Ordinance #12-040, adopted June 26, 2012, changed the approval path for conversions in the R-7 zone to an Ordinance process, to match what was done for R-8 zones the year before.
- Ordinance #14-219, adopted May 7, 2014, clarified the Council's intent that conversions should only be permitted where additional dwelling or efficiency units in the R-7 or R-8 districts may be authorized only by a conditional-use ordinance and only as long as the number of dwelling and efficiency units to be allowed conforms with the applicable principal permitted-use bulk regulations for the district in which the building is located. As a practical matter, this did not prohibit conversions that required variances, and the Council continued approving them after this amendment was enacted.
- Upon adoption of a new Article 32 – *Zoning* in 2017, the need for conditional use conversions were included in § 9-701, and only approved by Ordinance in R-7 and R-8 zones, and by the BMZA in R-9 and R-10 zones. The new *Zoning* Code maintained the conversion practice without change, but simplified the language to remove the unnecessary Council's self-limitation on only approving conversions that met the bulk requirements (*i.e.* without variances) that were not followed.

Bill Proposal: This bill seeks to repeal Sections 9-701 through 9-703, the subtitle designation, “Subtitle 7. Residential Conversions”, and Sections 10-609 and 12-303(i) of Article 32 – *Zoning* of the Baltimore City Code. This will remove the requirement for conditional use approval - either by the Board of Municipal and Zoning Appeals (BMZA), or by a legislative authorization for all conversions, making them permitted by-right provided the property can meet other relevant requirements in the code such as bulk and yard requirements. Staff notes that vehicle parking requirements will apply to the fourth dwelling unit unless CCB #25-0065 is adopted. The most recent amendment to Article 32 – *Zoning* exempted vehicle parking for up to three dwelling units earlier this year (*cf.* § 16-601 (b)(1)).

As residential conversions will be removed from Article 32 – *Zoning*, the bill removes a reference to conversions in § 4-405, which describes what applications require Design Review, that will no longer be needed.

§ 4-405. Applicability.

(a) *In general.*

Except as provided in subsection (b) of this section, design review is required for the following types of development:

- (5) when exterior modifications are proposed for residential conversion in the R-7, R-8, R-9, and R-10 Districts;]

Staff notes that § 4-405(a)(1) requires Design Review for new construction of dwellings, so functionally nothing will change.

STATE POLICY FOR ACCESSORY DWELLING UNITS

A recent State law change to the Land Use Article was implemented via SB891 and took effect at the start of October. This bill entitled “Land Use and Real Property – Accessory Dwelling Units – Requirements and Prohibitions” and is intended to encourage Charter Counties (the City of Baltimore is one of those) to accept Accessory Dwelling Units (ADUs) where single-family detached homes are allowed. The relevant portions are as follows:

SUBTITLE 5. ACCESSORY DWELLING UNITS.

4-501.

(A) IN THIS SUBTITLE THE FOLLOWING WORDS HAVE THE MEANINGS INDICATED.

(B) (1) “ACCESSORY DWELLING UNIT” MEANS A SECONDARY DWELLING UNIT THAT IS:

(I) ON THE SAME LOT, PARCEL, OR TRACT AS A PRIMARY SINGLE-FAMILY DETACHED DWELLING UNIT ;
AND

(II) NOT GREATER THAN 75% OF THE SIZE OF AND SUBORDINATE IN USE TO THE PRIMARY SINGLE-FAMILY DETACHED DWELLING UNIT.

(2) “ACCESSORY DWELLING UNIT” INCLUDES A STRUCTURE THAT IS:

(I) SEPARATE FROM THE PRIMARY SINGLE-FAMILY DETACHED DWELLING UNIT; OR

(II) ATTACHED AS AN ADDITION TO THE PRIMARY SINGLE-FAMILY DETACHED DWELLING UNIT.

(C) (1) “DWELLING UNIT” MEANS A SINGLE UNIT PROVIDING COMPLETE LIVING FACILITIES FOR AT LEAST ONE INDIVIDUAL, INCLUDING, AT A MINIMUM, PROVISIONS FOR SANITATION, COOKING, EATING, AND SLEEPING.

(2) “DWELLING UNIT” DOES NOT INCLUDE A UNIT IN A MULTIFAMILY RESIDENTIAL BUILDING.

...

4-502.

THIS SUBTITLE APPLIES ONLY TO THE DEVELOPMENT OF ACCESSORY DWELLING UNITS ON LAND WITH A SINGLE-FAMILY DETACHED DWELLING UNIT AS THE PRIMARY DWELLING UNIT.

4-503.

(A) IT IS THE POLICY OF THE STATE TO PROMOTE AND ENCOURAGE THE CREATION OF ACCESSORY DWELLING UNITS ON LAND WITH A SINGLE-FAMILY DETACHED DWELLING UNIT AS THE PRIMARY DWELLING UNIT IN ORDER TO MEET THE HOUSING NEEDS OF THE CITIZENS OF MARYLAND.

(B) (1) EXCEPT AS PROVIDED IN THIS SUBTITLE AND SUBJECT TO PARAGRAPH (2) OF THIS SUBSECTION, THIS SUBTITLE DOES NOT ALTER OR ABROGATE ANY ZONING POWER OR RELATED AUTHORITY GRANTED TO A LOCAL JURISDICTION UNDER THIS TITLE.

(2) LOCAL JURISDICTIONS SHALL ESTABLISH POLICIES THAT FURTHER THE INTENT OF THIS SUBTITLE.

4-504.

(A) (1) ON OR BEFORE OCTOBER 1, 2026, EACH LEGISLATIVE BODY SHALL ADOPT A LOCAL LAW AUTHORIZING THE DEVELOPMENT OF ACCESSORY DWELLING UNITS IN ACCORDANCE WITH THIS SECTION.

(2) A LEGISLATIVE BODY MAY ADOPT A LOCAL LAW THAT:

(I) ESTABLISHES STANDARDS FOR ACCESSORY DWELLING UNIT SAFETY; AND

- (II) PROHIBITS THE FULL OR PARTIAL CONVERSION OF AN ACCESSORY STRUCTURE AS AN ACCESSORY DWELLING UNIT IF THE ONLY VEHICULAR ACCESS TO THE ACCESSORY STRUCTURE IS FROM AN ALLEY.

...

ANALYSIS OF BILL:

As the purpose of this bill is to allow for greater variety of housing types and increased density options in the lower-density residential zones in the City, this bill will allow for up to four dwelling units to exist anywhere that a single-family dwelling can now exist, provided it meets the gross floor area, bulk, and parking requirements (unless CCB #25-0065 is adopted). As proposed, the bill will essentially out-perform the State’s policy intent, where allowing 2-4 dwelling units on lots where only one unit is now allowed will increase density and options beyond what was expected by the State.

Attached at the end of this report is a GIS study of residential zones by percentage of the City’s land area, as well as percentage share of residential zones for each individual zone.

EQUITY:

Staff understands the concerns expressed in the letters received, where some neighbors may be alarmed at the potential for overcrowding. We do not believe that there will be massive adoption of this potential, but recognize that many property owners may be concerned more about the property immediately adjacent to them rather than future citywide trends. The intent of the bill is to provide additional options for affordable housing in places that do not now allow it through increased density.

NOTIFICATION: This hearing was advertised to approximately 17,000 subscribers to the GovDelivery service.



Tim Keane
Director

Zoning District	Area (Acres)	% of City	% of Residential Land
R-1	1,837.79	3.53%	7.56%
R-1-A	88.83	0.17%	0.37%
R-1-C	1,233.29	2.37%	5.07%
R-1-D	723.28	1.39%	2.97%
R-1-E	1,123.10	2.16%	4.62%
R-2	66.56	0.13%	0.27%
R-3	3,986.17	7.66%	16.40%
R-3/HR	2.06	0.00%	0.01%
R-4	1,607.02	3.09%	6.61%
R-4/D-MU	20.19	0.04%	0.08%
R-4/HR	14.34	0.03%	0.06%
R-5	3,837.51	7.38%	15.79%
R-5/HR	1.21	0.00%	0.00%
R-6	6,155.98	11.84%	25.30%
R-6/HR	1.87	0.00%	0.01%
R-6/R-MU	1.08	0.00%	0.00%
R-7	1,261.04	2.43%	5.19%
R-7/HR	1.18	0.00%	0.00%
R-7/R-MU	1.6	0.00%	0.01%
R-8	2,600.51	5.00%	10.69%
R-9	1,038.13	2.00%	4.27%
R-10	1,232.10	2.37%	5.07%



CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

TO	The Honorable President and Members of the Baltimore City Council
FROM	Veronica P. McBeth, Director, Department of Transportation
CC	Mayor's Office of Government Relations
DATE	November 17, 2025
SUBJECT	25-0066 • Zoning – Housing Options and Opportunity

Position: Favorable

BILL SYNOPSIS

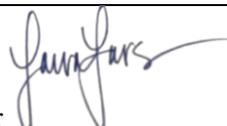
Council Bill 25-0066 defines a low-density multi-family dwelling as a property consisting of two to four residential units. Under current law, converting a single-family house into a multi-family dwelling typically requires an ordinance. The bill would streamline the process for creating multi-family housing in various residential zoning districts by permitting these new low-density multi-family dwellings in most residential zoning districts. The bill also outlines minimum space requirements for the creation of new units, thereby discouraging untenable overcrowding or poor living conditions in this new residential property type.

SUMMARY OF POSITION

DOT has reviewed the proposed legislation and does not anticipate any immediate fiscal or operational impact resulting from the changes. DOT will continue to monitor potential long-term impacts on traffic patterns, congestion, and parking enforcement needs arising from a potential densification of neighborhoods. DOT respectfully requests a favorable report on Council Bill 25-0066.



CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

TO	The Honorable President and Members of the Baltimore City Council
FROM	 Laura Larsen, Budget Director
DATE	September 5 th , 2025
SUBJECT	City Council Bill 25-0066, Zoning – Housing Options and Opportunity

The Honorable President and
Members of the City Council City
Hall, Room 400

Position: Favorable

The Department of Finance is herein reporting on City Council Bill 25-0066, Zoning – Housing Options and Opportunity, the purpose of amending certain provisions of the Baltimore City Zoning Code to promote increased development of low-density multi-family dwellings in certain residential districts; striking residential conversion standards for single-family dwellings into multi-family dwellings; amending certain permitted and conditional uses; amending certain bulk and yard standards; and defining certain terms

Background

Council Bill 25-0066 seeks to address Baltimore’s housing affordability and availability challenges by amending the city’s zoning code. The bill proposes to allow the development of low-density multi-family housing—structures with 2 to 4 units—in a broader range of residential neighborhoods than previously permitted.

Council Bill 25-0066 creates a new housing category in the zoning code, expands permitted uses, repeals conversion rules, and establishes development standards for this new category. Specifically, it introduces a new residential use: “Dwelling: Multi-Family (Low Density),” defined as a building containing 2 to 4 units. This new housing type would be permitted by right in nearly all residential zoning districts (R-1 through R-10), as well as in office-residential zones.

The legislation sets development standards for the new housing category, including requirements for bulk, yard size, floor area, height, setbacks, lot coverage, and impervious surfaces. It also eliminates prior restrictions and prohibitions on converting single-family homes into multi-family units and removes certain design review requirements.

Residential unit production trends

The intent of Council Bill 25-0066 is to increase the production of low density multifamily residential buildings, specifically duplexes, triplexes and quadplexes. This is commonly referred to as the “missing middle,” in housing policy. Over the last 10 years, Baltimore has not produced units of the missing middle

in comparison to single family homes and 5+ unit apartment buildings. The table below is drawn from data from the Census Bureau, via the Department of Housing and Urban Development, State of the Cities Data Systems – Building Permits, a database that contains data on permits for residential construction issued by nearly 20,000 jurisdictions collected in the Census Bureau's Building Permits Survey. This table presents this HUD data on residential building permits issued in Baltimore from 2013 to 2024. It breaks down the number of permitted single-family and multi-family housing units by year, providing insight into the city's construction trends over the past decade.

Annual Residential Building Permits in Baltimore by Number of Units, SOCDs¹

Unit Types	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Single Family	220	241	219	267	169	99	130	101	191	118	92	165
2-Unit multifamily	8	4	10	4	0	0	2	0	0	2	2	4
3 & 4-Unit Multifamily	48	4	0	0	0	0	18	0	0	0	0	0
5+ Unit Multifamily	981	572	1,064	672	269	1,448	360	1,520	1,366	1,537	1,749	1,104
All multifamily	1,037	580	1,074	676	269	1,448	380	1,520	1,366	1,539	1,751	1,108
Total Buildings	1,257	821	1,293	943	438	1,547	510	1,621	1,557	1,657	1,843	1,273

Since 2018, most of Baltimore's new housing production has come from large multi-family buildings, while single-family home construction has declined. Meanwhile, 2–4-unit buildings—the “missing middle” housing—have been absent, despite their potential to offer more affordable, moderate-density options.

Council Bill 25-0066 seeks to address this gap by reducing barriers to construct units that fall into the missing middle housing types. While the data shows a trend toward higher-density construction, this legislation ensures that smaller-scale multi-family housing can also contribute to meeting the city's housing needs.

Anne Arundel County

The Anne Arundel County Council passed the Housing Attainability Act of 2024 (Bill 72-24), in September of 2024. The legislation contained a number of provisions including amendments to bulk and yard requirements. The councilmembers who introduced the Housing Attainability Act stated that the goals of this legislation were to allow for more efficient land use to increase attainable housing units across Anne Arundel County, creativity in site layout, and create better opportunities to achieve allowable density. The goal of these reforms is to allow for the construction of triplexes, fourplexes, multiplexes, and townhomes. By adding flexibility of dwelling types into the Code, the reforms allow for development

¹ [State of the Cities Data Systems \(SOCDs\) - Building Permits | HUD USER](#)

sites to be reimagined with a mix of house scale structures. These house scale buildings provide solutions along a spectrum of attainability, or the “missing middle”.

Maryland Housing Needs Assessment

The State of Maryland commissioned the “2020 Maryland Housing Needs Assessment & 10-Year Strategic Plan”, via Maryland Department of Housing and Community Development (MD DHCD). The MD DHCD issued a follow up report in 2025 with updated numbers and revised policy recommendations. The report’s intent is to assess Maryland’s current and future housing needs and outline strategies to address them over the next decade. Its goals include identifying housing challenges, projecting future demand, and recommending policies to ensure all Maryland residents have access to safe, affordable, and appropriate housing. It also aims to guide state and local decision-makers in prioritizing investments, aligning resources, and coordinating efforts to meet diverse housing needs. The report discussed 70 actions designed to address priority needs by region in the state.

By integrating low-density multifamily housing into the base zoning code, Council Bill 25-0066, directly addresses a core barrier to housing choice: the fact that much of Baltimore’s residential land only allows one housing unit per lot. This change means that modestly scaled apartment buildings, duplexes, triplexes, and fourplexes could be built without special approvals—reducing development costs, shortening timelines, and making more efficient use of the city’s existing infrastructure.

In the broader context of Maryland’s housing pressures—where many communities face rising demand but maintain low-intensity zoning—the multifamily zoning reform aligns with other efforts like upzoning, small-lot development, and bulk-and-yard requirement reductions. Together, these changes expand the range of housing types available, increase by-right development opportunities, and help diversify neighborhoods while still ensuring appropriate building scale and design standards. This reform would bring Baltimore closer to a zoning framework that supports growth, affordability, and a mix of housing options in every part of the city.

Fiscal Impacts

Currently, converting a single-family home into a multi-family dwelling is only permitted in the R-7, R-8, R-9, and R-10 zoning districts. In the R-7 and R-8 districts, such conversions require conditional-use approval by ordinance, creating a barrier to small-scale housing diversification.

To estimate the fiscal impact of Council Bill 25-0066, the Department of Finance analyzed a limited sample of 63 properties that received variances from the City Council for residential conversions from single unit to multi-unit dwellings within residential zoning districts.

If Council Bill 25-0066 were enacted, property owners in these cases would most likely no longer need a variance to make similar changes. It is assumed that a portion of these and other property owners would take advantage of the new by-right process.

The primary fiscal impact is expected to be on property taxes, as the assessed value of a property increases with physical improvements. To assess this, the Department of Finance compared the FY2019 and FY2025 assessed values of the 63 properties. A present value adjustment was applied to the FY2025 assessments to account for inflation and assessment increases.

FY 2019 Assessment	FY 2025 Assessment	Present Value calculation
\$5,708,199	\$6,840,734	\$5,542,187

During this same period the average annual assessment grew at a rate of 4.3% (not the triannual assessment which combines three years of assessments) annually. For the control value, the Department

calculated a present value (utilizing the average annual assessment rate increase) of \$5,542,187 for FY2025 assessments, representing a real decrease of approximately \$166,012 (or -2.9%) compared to the FY2019 assessments. The reason for this is mainly due to geographic clustering of the properties in the limited sample. The 63 properties analyzed are primarily clustered on the city's west side, with 46 located in historically disinvested neighborhoods that have a low score in Baltimore's Housing Market Typology.

Due to the by right nature of parts of the law, there will be a reduction in the number of property owners that seek variances. This will have the operational effective of a decreased volume of work. There are other operational efficiencies within the BMZA and Planning that will occur due to the passage of 250064, however it is unlikely that these will result in savings.

The 'Missing Middle' Elsewhere

The University of California, Berkeley's Othering and Belonging Institute maintains a database of American cities that have considered zoning reform over the past 17 years. During this time, 108 cities have reviewed 162 zoning initiatives. The database identifies four broad reform categories:

- **ADU Reform:** Accessory Dwelling Units, Granny Flats, Secondary Units
- **Plex Reform:** Duplexes, Triplexes, Fourplexes, 2-4 unit multi-family housing
- **TOD Reform:** Transit-Oriented Development, Transit-Specific Density Bonuses
- **Other Reform:** Form-Based Codes, Parking Reform, Non-Transit-Based Inclusionary Zoning

Council Bill 25-0066 most closely aligns with Plex Reform, which includes small-scale multi-family housing types. Seventeen cities have introduced plex reform independently, with 15 successfully passing it. An additional 51 cities introduced plex reform alongside other zoning reforms, with 42 of those efforts also being approved.

Conclusion

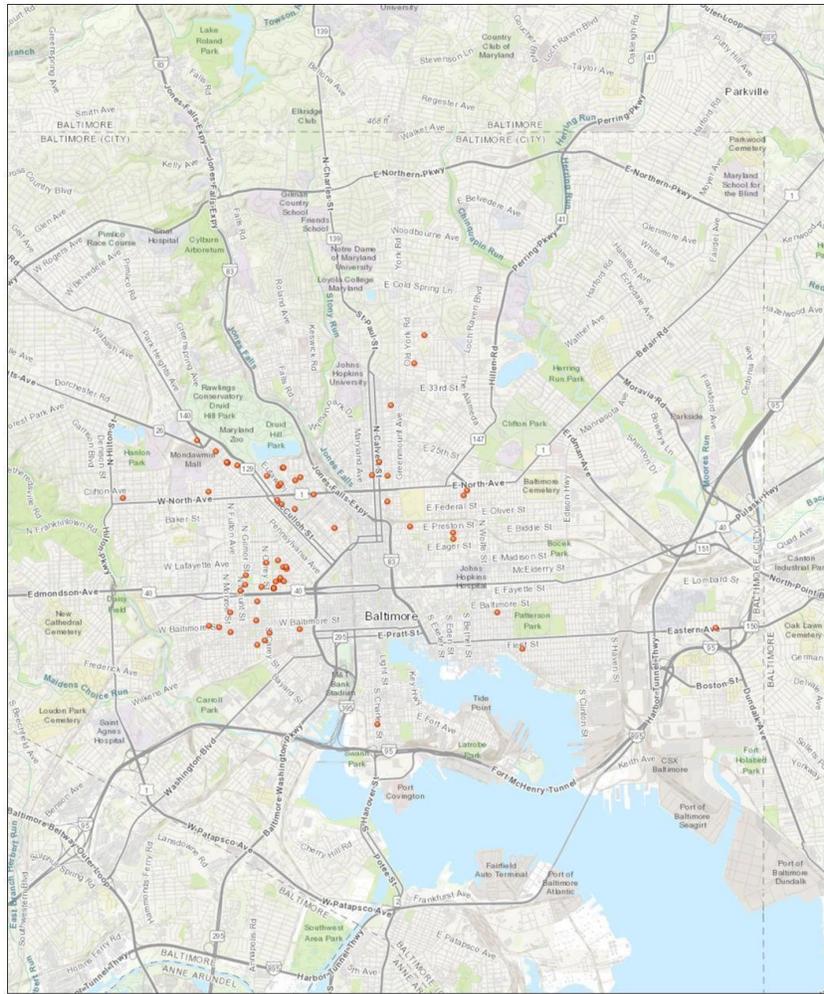
Council Bill 25-0066 presents a targeted and timely approach to address Baltimore's ongoing housing affordability and availability challenges. By legalizing small-scale multi-family housing in more residential neighborhoods, the legislation fills a critical gap in the city's housing stock—what is often referred to as the “missing middle.” Historical permit data shows that 2-4 unit housing has been virtually absent from new residential construction in recent years, even as demand for moderate-density, more affordable housing options continues to grow.

The bill aligns with national trends in zoning reform, as seen in dozens of peer cities that have adopted similar plex reforms. It also streamlines the development process by reducing unnecessary regulatory barriers and expanding by-right development options, which could lead to more equitable and geographically diverse housing production across Baltimore. While the fiscal analysis indicates that shortterm revenue gains may be limited, the long-term benefits of housing diversification, neighborhood reinvestment, and broader housing access are substantial.

For the reasons stated above, the Department of Finance supports City Council Bill 25-0066.

cc: Michael Mocksten
Nina Themelis

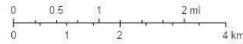
Baltimore City CoDeMap



7/8/2025, 9:54:19 AM

● Residential Conversions geocode

1:72,224



City of Baltimore, Baltimore County Government, VITA, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA, NGA, EPA, USDA

DHCD

City of Baltimore, Baltimore County Government, VITA, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA, NGA, EPA, USDA



**BALTIMORE CITY
BOARD OF MUNICIPAL
AND ZONING APPEALS**

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Victor Clark
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417 E. Fayette St., Ste. 922
Baltimore, MD 21202
(410) 396-4301
zoning.baltimorecity.gov

MEMORANDUM

To: The Honorable Members of the Land Use & Transportation Committee
From: Justin A. Williams, Interim Executive Director
CC: Geoffrey Veale, Zoning Administrator
Date: November 19, 2025
Re: Council Bill No. 25-0066 – Zoning – Housing Options and Opportunity
Position: Recommend Approval

NOTE: This report has been prepared by the staff of the Board of Municipal and Zoning Appeals following discussion with the Board at its general meeting on November 18, 2025. The Board did not have an opportunity to review this final report prior to submission.

The Board of Municipal and Zoning Appeals (BMZA) has reviewed City Council Bill #25-0066 and recommends its approval. This legislation offers Baltimore a practical, proven pathway to address the City’s housing challenges while respecting neighborhood character. The bill removes bureaucratic barriers that currently prevent sensible, quality housing development across the City.

Overview of Proposed Legislation

This bill makes a straightforward but transformative change to the City’s Zoning Code. It allows property owners to convert single-family homes into two, three, or four units without requiring a lengthy conditional use hearing. The legislation accomplishes this by creating a new use category titled “Dwelling: Multi-Family (Low Density)” and making it permitted by right in Residential Districts R-1A through R-8 and Office-Residential Districts.

Currently, the Zoning Code provides no viable pathway for a homeowner who wishes to convert a large rowhouse into a duplex. The Board is prohibited from approving such conversions in most residential districts. Some property owners file applications anyway, only to receive denials based on jurisdictional limitations rather than project merit. Alternatively, property owners can pursue approval via City Council ordinance, but this process requires legal representation, public hearings, and significant expense - barriers that tend to be prohibitive for most individual homeowners and small local developers. This bill corrects this systemic deficiency, allowing conversions administratively provided they meet strict new size and quality standards.

This change will expand housing options for Baltimore families, facilitate the rehabilitation of vacant homes, reduce bureaucratic processes, and provide greater certainty for small property owners seeking to improve their properties.

Eliminating Inefficient Administrative Procedures

The current regulatory system places the Board in an untenable position. The Board regularly hears appeals for modest residential conversions that it is statutorily prohibited from approving. Property owners expend time and financial resources preparing applications. Neighbors

attend hearings. Board members deliberate. The Board must then deny the request, not because the proposed project is poorly designed or because neighbors object, but solely because the Zoning Code deprives the Board of authority to grant approval.

A brief review of the Board’s recent case history illustrates this jurisdictional impediment. In Appeal Nos. **2024-262** (15 E. West St.), **2024-155** (815 E 33rd St), **2024-022** (2709 Jefferson St), and **2020-163** (1612 Ashburton St), the Board was compelled to deny requests for modest multi-family conversions (e.g., 2 units). None of these denials were based on project quality, design deficiencies, or community opposition. They resulted purely from jurisdictional limitations imposed by the existing Zoning Code. The law gave the Board no choice.

More significantly, numerous other property owners never file applications because they are correctly advised that the Board lacks jurisdiction to approve their proposals. These applicants include individuals who wish to rehabilitate vacant homes, create affordable rental units, or generate supplemental income by adding residential units to their properties. However, they abandon these plans because the existing process offers no viable path to approval. This bill corrects that systemic deficiency.

Analysis and Supporting Evidence

The Board supports this legislation because empirical evidence from Baltimore’s own experience and from peer cities nationwide demonstrates that it will meaningfully improve housing affordability, neighborhood stability, and quality of life.

1. Creating Affordable Housing Through Increased Supply

Baltimore requires additional housing options that families can afford. The “missing middle” housing typology, which includes duplexes, triplexes, and fourplexes, fills the gap between expensive single-family homes and large apartment buildings. When cities permit this housing type, market prices stabilize and affordability improves. The following peer cities provide compelling evidence:

- **Portland, Oregon:** After legalizing up to four units on residential lots, new middle housing units sold for \$250,000 to \$300,000 less than new detached single-family homes in the same zones.¹ This price differential represents the difference between homeownership remaining aspirational versus becoming accessible for working families, teachers, nurses, and first-time buyers.
- **Minneapolis, Minnesota:** Following the 2018 “Minneapolis 2040” plan, which eliminated single-family zoning, the city increased its housing stock by 12% between 2017 and 2022. Consequently, rents in Minneapolis grew by just 1%, compared to a 14% increase in the remainder of Minnesota where housing supply remained constrained.² While other communities experienced significant rent inflation that displaced residents, Minneapolis maintained housing accessibility.
- **New Rochelle, New York:** After implementing zoning reforms to streamline approvals and increase density, New Rochelle added approximately 4,500 new units. While national

rents surged by double digits following 2020, median rents in New Rochelle actually declined by 2% between 2020 and 2023 because robust supply effectively absorbed demand.³

These outcomes demonstrate a consistent pattern. When cities remove regulatory barriers to building modest-scale housing, affordability improves. This represents documented evidence from jurisdictions that have implemented policies similar to those proposed in this bill.

2. Facilitating Vacant Property Rehabilitation and Neighborhood Stabilization

Baltimore confronts a persistent challenge with over 12,000 vacant buildings. This crisis diminishes neighborhood quality, undermines property values, and drains public resources. Many of these properties are large, historic rowhouses where renovation as a single-family home is economically infeasible. When a property requires \$200,000 in renovations but the completed single-family home would only appraise for \$150,000, the economics do not support investment. Consequently, the property remains vacant and continues to deteriorate.

This bill fundamentally alters that economic calculus. By permitting two to four units, a developer or homeowner can generate sufficient rental income to justify the renovation investment. A neighborhood liability becomes quality housing stock, often without requiring city subsidy. The Board has observed this dynamic locally. Properties that could not attract investment as single-family homes have been successfully rehabilitated when conversion to multiple units became feasible.

This mechanism is particularly effective in neighborhoods with strong historic character but weaker market fundamentals. The bill does not subsidize gentrification. Rather, it enables organic, small-scale investment that respects existing neighborhood context while returning buildings to productive use.

3. Promoting Stable Communities Through Quality Housing Options

Some stakeholders have expressed concern regarding the perceived instability of renter-occupied housing. However, empirical research challenges the “renter vs. homeowner” dichotomy that suggests only ownership leads to stability.

- **Tenure Length is Key:** Studies indicate that neighborhood stability and social trust are correlated with residential tenure length (how long a resident stays in a community), not whether they own or rent the property. For instance, seminal research in the *Journal of Urban Economics* found that a significant portion of the social capital often attributed to homeownership is actually driven by the duration of residence.⁴ Further research confirms that long-term residents, regardless of tenure status, act as the primary drivers of social cohesion and local support networks.⁵
- **Combating Turnover:** High turnover creates instability. By increasing the supply of quality, code-compliant rental and condo options, we reduce the scarcity that drives displacement and turnover. Secure, high-quality rentals allow residents to stay in their neighborhoods longer, fostering the social connections and civic participation that define stable communities.

4. Improving Housing Quality Through Market Competition

The City's current rental market is constrained by limited supply in areas of opportunity. When tenants have few housing options, landlords have reduced incentive to invest in property improvements. This bill alters that dynamic by legalizing additional housing options, thereby creating market competition that naturally drives quality improvements.

When renters can choose among multiple well-maintained properties, landlords must compete by offering superior conditions, responsive management, and modern amenities. Properties that are not adequately maintained lose tenants to competitors. This market pressure, in combination with regulatory enforcement, drives continuous improvement in housing stock quality over time.

Response to Community Concerns and Existing Regulatory Protections

The Board is aware of concerns raised by community members during the public input process. These concerns warrant direct and thorough response. However, it is critical to view this bill within the context of Baltimore's existing protective policies, which provide a safety net against the concerns raised.

Concern #1: Potential for Speculative Development and Substandard Housing Conversions

Response: The bill contains dimensional requirements that prevent the creation of substandard housing units:

- To convert a property to four units, the structure must contain at least 3,000 square feet of enclosed floor area. Basement space does not count toward this minimum requirement.
- Data presented at the Planning Commission hearing demonstrates the restrictive nature of this standard: Of the 213,600 properties in R-1 through R-8 districts, only ~3.5% possess sufficient floor area to accommodate four units under these dimensional requirements.

The bill's dimensional standards ensure quality outcomes by requiring substantial floor area regardless of the number of units created. Even at the two-unit threshold of 1,500 square feet, the bill mandates significantly more space than would be required for two typical studio apartments or efficiency units. These standards prevent the economically marginal conversions that typically result in substandard housing conditions. Properties that barely meet the minimum thresholds offer limited financial return for the substantial renovation investment required, naturally discouraging low-quality speculative conversions. The bill's standards effectively channel conversion activity toward properties where the existing building size and configuration support quality, family-appropriate dwelling units.

Concern #2: Potential for Displacement and Housing Unaffordability

Response: Baltimore maintains comprehensive protections for residents against displacement and unaffordable tax increases. This zoning change operates in conjunction with, rather than in opposition to, these existing programs:

- **Homestead Tax Credit:** State law caps annual taxable assessment increases at 4% for owner-occupied homes, ensuring long-term homeowners are not displaced due to neighborhood appreciation.⁶
- **Homeowners' Property Tax Credit:** This income-based program limits property taxes to amounts that households can reasonably afford, regardless of assessment changes.⁷
- **Senior Citizen Tax Credit:** Enhanced city credits specifically protect seniors on fixed incomes, enabling them to age in place.⁸
- **Maryland Renters' Tax Credit:** This program recognizes that renters bear property tax burdens through rent payments and provides direct financial relief to eligible renters.⁹
- **Inclusionary Housing Requirements:** Large developments must set aside affordable units, ensuring new growth includes options for lower-income residents.¹⁰
- **Community Land Trusts:** The City's Affordable Housing Trust Fund supports permanent affordability through community-owned land that is removed from speculative markets.¹¹
- **Tenant Opportunity to Purchase:** State law provides tenants with first rights to purchase their buildings when sold, protecting against sudden displacement.¹²
- **Historic Preservation Tax Credits (CHAP):** The 10-year CHAP credit incentivizes high-quality rehabilitation that preserves neighborhood character while making renovation economically viable.¹³

The actual displacement risk derives from maintaining the status quo. When housing scarcity drives up prices and young families cannot locate affordable homes, they depart Baltimore entirely. When vacant properties deteriorate because renovation is not economically feasible, surrounding property values decline and long-term residents suffer harm. This bill addresses these genuine displacement pressures by expanding housing options and enabling vacant property rehabilitation.

Conclusion

City Council Bill #25-0066 represents sound, evidence-based land use policy. It removes bureaucratic barriers that currently compel the Board to deny reasonable housing proposals. It aligns Baltimore with national best practices demonstrated in jurisdictions such as Portland, Minneapolis, and New Rochelle. The legislation operates within the City's existing framework of affordability protections and historic preservation tools.

This bill does not represent radical experimentation. Rather, it implements policies proven effective in peer cities. Other jurisdictions have demonstrated that allowing modest density in residential areas increases affordability, reduces vacancy, and strengthens neighborhoods without sacrificing character or displacing existing residents.

The question before the Committee is not whether to embrace fundamental transformation. It is whether to remove an outdated regulatory barrier that currently prevents organic, small-scale housing development that Baltimore urgently requires.

For any questions regarding this report or to discuss these concerns further, please contact **Justin Williams** at justin.williams@baltimorecity.gov or **(410) 396-4301**.

Endnotes:

1. City of Portland Bureau of Plan. & Sustainability, *Portland Sees Significant Production in Middle Housing Resulting from Recently Adopted Zoning Changes* (Feb. 4, 2025), <https://www.portland.gov/bps/planning/rip2/news/2025/2/4/portland-sees-significant-production-middle-housing-resulting>
2. Alex Horowitz et al., *Minneapolis Land Use Reforms Offer a Blueprint for Housing Affordability*, Pew Charitable Trs. (Jan. 4, 2024), <https://www.pew.org/en/research-and-analysis/articles/2024/01/04/minneapolis-land-use-reforms-offer-a-blueprint-for-housing-affordability>
3. *How More Housing Revitalized a Suburban Downtown*, Pew Charitable Trs. (Nov. 13, 2024), <https://www.pew.org/en/research-and-analysis/articles/2024/11/13/how-more-housing-revitalized-a-suburban-downtown>
4. Denise DiPasquale & Edward L. Glaeser, *Incentives and Social Capital: Are Homeowners Better Citizens?*, 45 J. Urb. Econ. 354 (1999).
5. Danya E. Keene et al., *Length of Residence and Social Integration: The Contingent Effects of Neighborhood Poverty*, 24 Health & Place 1 (2013); *see also*, Judith L. Perrigo, et al., *Community Social Cohesion During a Large Public Housing and Neighborhood Redevelopment: A Mixed Methods Study*. SOCIETIES 15.5 (2025): 140 (finding trust correlates with tenure length).
6. Md. Code Ann, Tax-Prop. § 9-105; Baltimore City Code, Art. 28, § 10-1.
7. Md. Code Ann, Tax-Prop. § 9-104.
8. Baltimore City Code, Art. 28, § 10-20 (City Supplement to Homeowners' Tax Credit Program).
9. Md. Code Ann, Tax-Prop. § 9-102.
10. Baltimore City Code, Art. 13, Subtitle 2B (Inclusionary Housing Program).
11. *See e.g.*, Balt. City Dep't of Hous. & Cmty. Dev., *Community Land Trust Program Homeownership NOFA* (Aug. 15, 2025).
12. *See* Maryland Renters' Rights and Stabilization Act (effective Oct. 1, 2024), preempting The Baltimore City Tenant Opportunity to Purchase Act.
13. Baltimore City Code, Art. 28, § 10-8.



CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

TO	The Honorable President and Members of the Baltimore City Council
FROM	Alice Kennedy, Commissioner, Housing and Community Development
CC	Mayor's Office of Government Relations
DATE	November 19, 2025
SUBJECT	25-0066 Zoning – Housing Options and Opportunity

Position: Favorable

BILL SYNOPSIS

The Department of Housing and Community Development (DHCD) has reviewed City Council Bill 25-0066 Zoning – Housing Options and Opportunity for the purpose of amending certain provisions of the Baltimore City Zoning Code to promote increased development of low-density multi-family dwellings in certain residential districts; striking residential conversion standards for single-family dwellings into multi-family dwellings; amending certain permitted and conditional uses; amending certain bulk and yard standards; and defining certain terms.

If enacted, City Council Bill 25-0066 would establish a new land use category; *Dwelling: Multi-Family (Low Density)* and permit its use, by right, in residential districts R-1-A through R-8. This new permitted use would allow for multi-family dwellings of up to 4 units when all other requirements, such as minimum enclosed gross floor area, have been met. This Bill would also permit, by right, conversions of already existing single-family homes into multi-family homes of up to 4 units, with the applicable number of units determined by the interior square footage of the building. If approved, this Bill will take effect on the 30th day following its enactment.

BACKGROUND

Housing instability is a major problem for Baltimore City residents, many of whom are cost-burdened and potentially subject to eviction and foreclosure. An estimated 54% of City residents cannot comfortably afford the average \$1500 1-bedroom apartment and 30% of homeowner households also experience housing cost burdens. These financial challenges contribute to Baltimore having an eviction rate 1.7 times higher than the Maryland average and 2.3 times higher than the national average. The gap between wages and the cost of housing is particularly stark for some of our most essential workers. For example, according to data provided by the US Bureau of Labor Statistics, half of Baltimore's retail and food service workers cannot afford a 1-

bedroom apartment within the City. That figure drops to 40% for secretaries or administrators and only 35% of maintenance and repair workers can handle those costs without being unduly burdened. Similar figures are shared with other critical workforce areas. When adjusted for the average \$1700 2-bedroom apartment, even fewer can manage.

It is important to note that these figures rely on HUD data that includes not just Baltimore City, but the six surrounding counties that make up the Baltimore-Towson-Columbia Metropolitan Statistical Area: Baltimore, Anne Arundel, Carroll, Harford, Howard, and Queen Anne's Counties. Drawing from that much broader region results in an 80% Area Median Household Income of \$104,200, which is the amount required to qualify for “Affordable” housing. In comparison, Baltimore City’s actual Area Median Household Income is just \$59,579. This results in nearly 3 out of 4 Baltimore City households being unable to afford even HUD-designated low-income housing.

SUMMARY OF POSITION

City Council Bill 25-0066 *Zoning – Housing Options and Opportunity* seeks to increase the supply of affordable housing in Baltimore City by ending single-family zoning and permitting the conversion of single-family homes into multi-family homes of up to 4 units in residential zoning districts R-1-A through R-8. Currently, multi-family housing is permitted in districts R-5 through R-10, with this Bill expanding that option to the lower density R-1-A through R-4 districts. Conditional Use Conversions of existing single-family homes into multi-unit homes is currently permitted in districts R-7 through R-10, with R-7 and R-8 requiring a City Council ordinance. These restrictions on conversions first began in 1999 with Ordinance #99-425, which changed the Zoning Code of the time to outright prohibit the conversion of single-family homes in the R-6 and less dense zones, and to require a conditional use approval through the Board of Municipal and Zoning Appeals in the denser residential zones. Successive City Council Ordinances continued to place further restrictions on such conversions until the comprehensive City-wide rezoning of 2017.

Removing these barriers to both new, lower density multi-family housing and the conversion of appropriately sized, existing single-family homes into multi-family housing could provide Baltimore with more naturally occurring affordable housing options. This would be made possible through increased density and the development of the often discussed “missing middle” of housing types that fall between detached single-family homes and larger apartment buildings with at least 5 (and often many more) units. This “missing middle,” exemplified by the *Multi-Family (Low Density)* category that this Bill creates, could offer greater affordability while maintaining both walkability and a more intimate setting than what can be offered by the highest density designations. This flexibility could also support greater homeownership and homeowner retention. For example, having a second, rental income generating unit can help an applicant qualify for a mortgage. Retention could be increased by giving homeowners the option of renovating and renting out space that is no longer needed. Greater possibilities for elder parents or grandparents to “age in place” with dignity and near family would also be made available.

Similar reform efforts are beginning to gain momentum across the Country. Announced in 2018 and fully implemented in 2020, Minneapolis Minnesota became the first major American City to

eliminate exclusively single-family zoning. When considered with other reform efforts, such as their elimination of parking minimums, data collected by Pew showed that from 2017 to 2022 Minneapolis increased its housing stock by 12% while rents grew by just 1%. Over the same period, the rest of Minnesota added only 4% to its housing stock while rents went up by 14%. Both Minneapolis and the rest of the state experienced population and household growth but despite increased demand, Minneapolis was able to limit rent growth by building more housing.

DHCD applauds the efforts of this administration to establish policies that support the creation of greater housing availability and affordability throughout the City. On its own, this Bill has the potential to help alleviate the significant shortage of attainable housing options suited for Baltimore's residents. When synergistically applied with the other, recently signed Bills within Mayor Scott's legislative housing package (such as the elimination of parking minimums, bulk and yard updates, and permitting "single stair" housing options) their combined efficacy could have an even greater effect to that end, mutually supporting their individual reform efforts. Furthermore, allowing more multi-family construction and conversions of already existing homes in a greater diversity of communities could help supply our workforce with the housing that they need and at a price point that works for them and their families.

DHCD already supports nearly all Conditional Use Conversions that come before the Council as part of the current Ordinance based approval process required within the R-7 and R-8 districts. We encourage such efforts so long as they are in the public interest and have not been deemed detrimental to public health, safety, or welfare. This Bill would help facilitate those projects without the time, money, and bureaucratic navigation required by the current system. Removing such barriers could increase the likelihood of returning presently vacant structures back to productive use and offering new housing options to communities throughout the City. These potential benefits would be felt in areas our agency already focuses on such as our Community Development Zones and Impact investment areas. For these reasons and more, DHCD requests a favorable report on City Council Bill 25-0066 *Zoning – Housing Options and Opportunity*.

FISCAL IMPACT

As drafted, this Bill would have minimal fiscal or administrative impact on DHCD.

AMENDMENTS

DHCD does not seek any amendments to this Bill at this time.

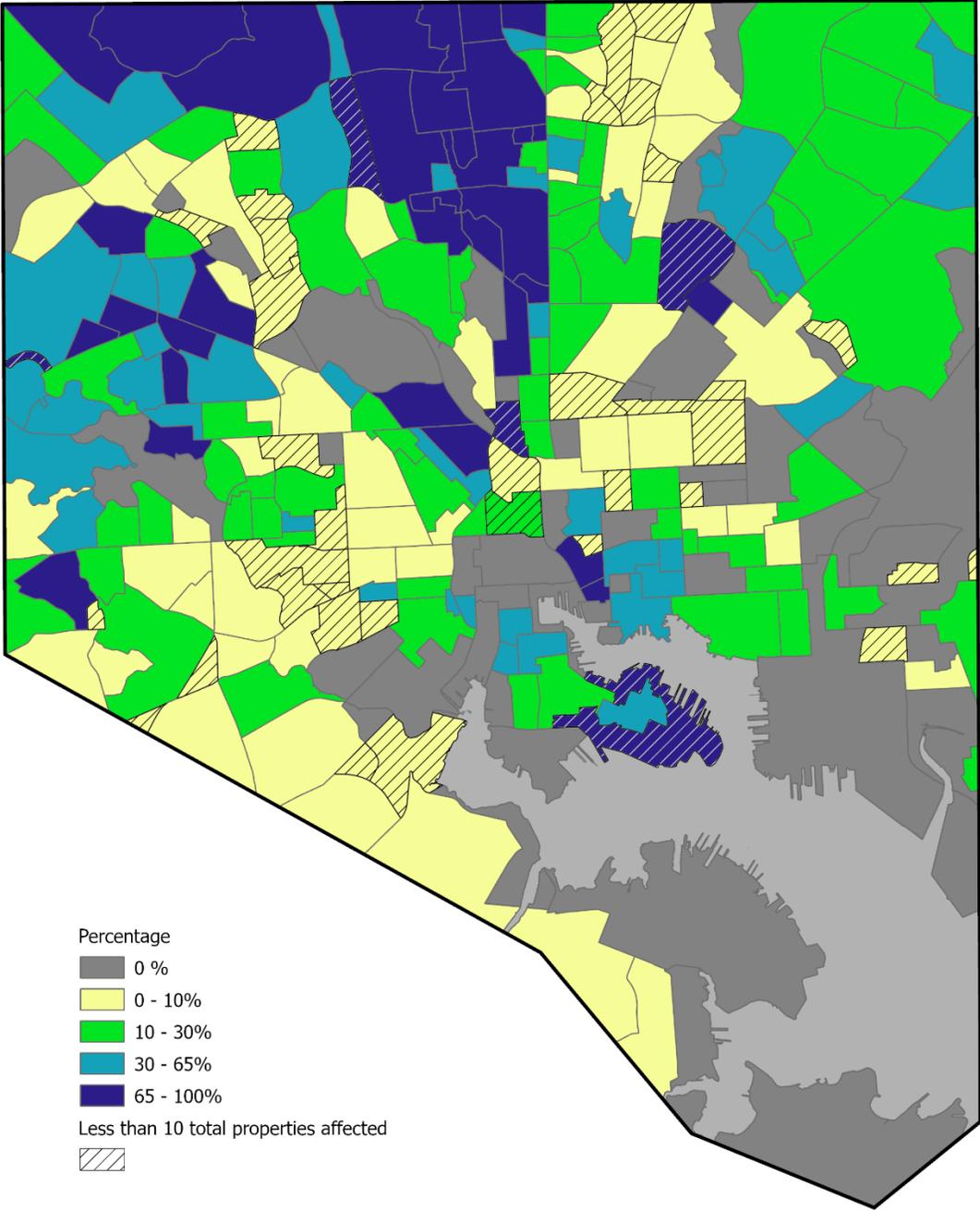
APPENDIX

DHCD has included below three maps of Baltimore City. These maps are broken down into recognized neighborhoods and show what percentage of their housing stock (in the R-1-A through R-8 designation) could potentially be applicable for 2, 3, and 4-unit conversions, based on qualifying minimum enclosed gross floor area. We have also included diagonal line shading to indicate neighborhoods wherein less than 10 individual homes would likely be impacted by the changes proposed within this legislation.

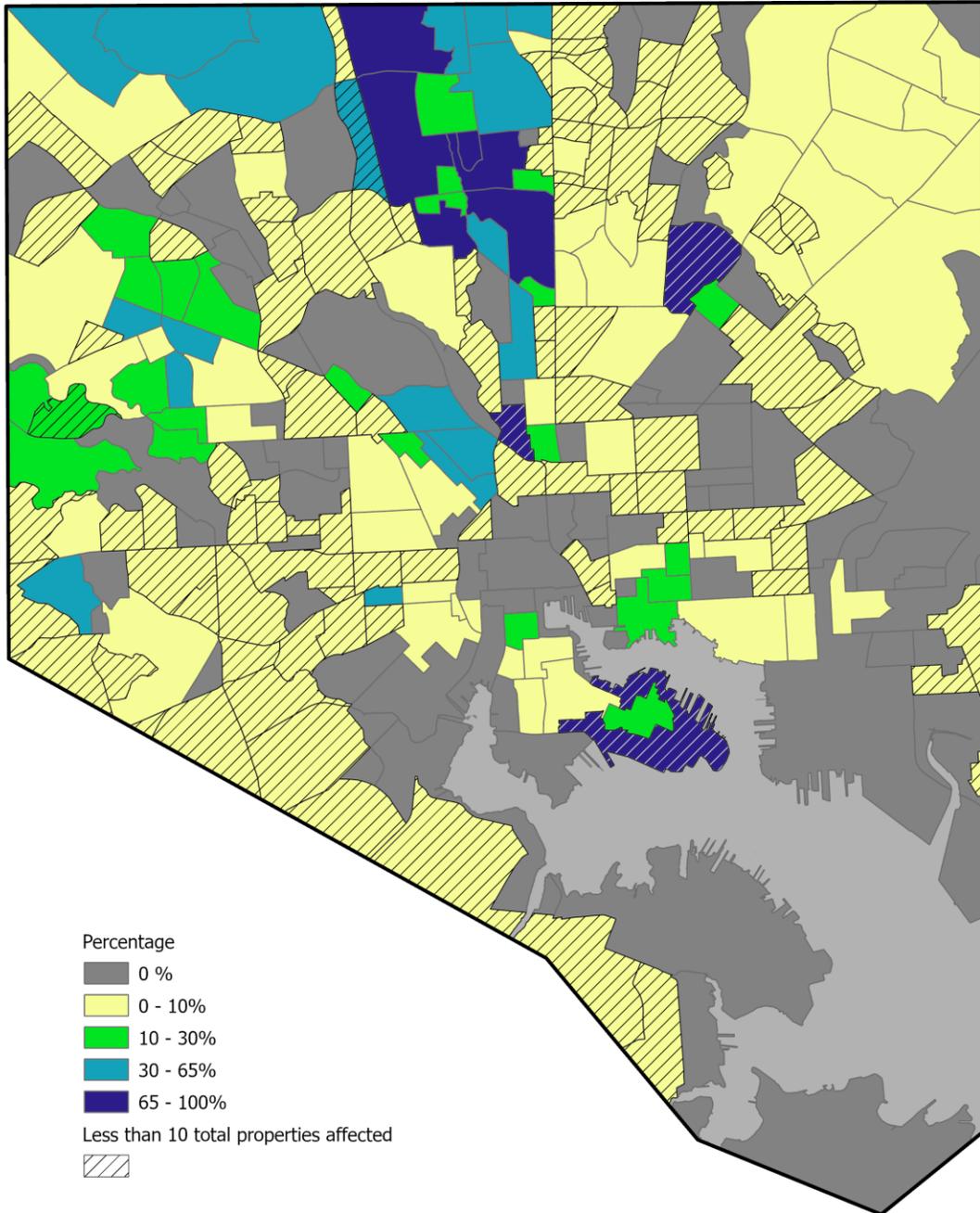
Note on data: There are geographic concentrations of properties where we do not get square footage from SDAT. DHCD used the following steps to generate estimates for missing square footage:

1. Gathered all properties in Zones R-1-A through R-8 with a DHCD use code that means a single-family dwelling.
2. For properties from #1 where structure area in SDAT data was null or zero, we then calculated the median value for all properties with data on the same block that also meet the criteria in #1 *OR* that have use codes designating them as multi-family residential but have a dwelling unit value of only 2 (strong likelihood of being a normal sized rowhouse that was subdivided and not a purpose built apartment that might be larger).
3. For properties that still have no area after #2 because nothing else on their block does either, we calculated median size for whole neighborhood but otherwise remained with same stipulations as in #2.
4. 2 entire neighborhoods were identified where properties still had no area after #3 (Langston Hughes and Darley Park). After consulting with a Neighborhood Development Officer, we used the median for the Pimlico Good Neighbors neighborhood for Langston Hughes, and the median for the 3100 block of Ravenwood Avenue in Four By Four for Darley Park due to comparable housing stock.

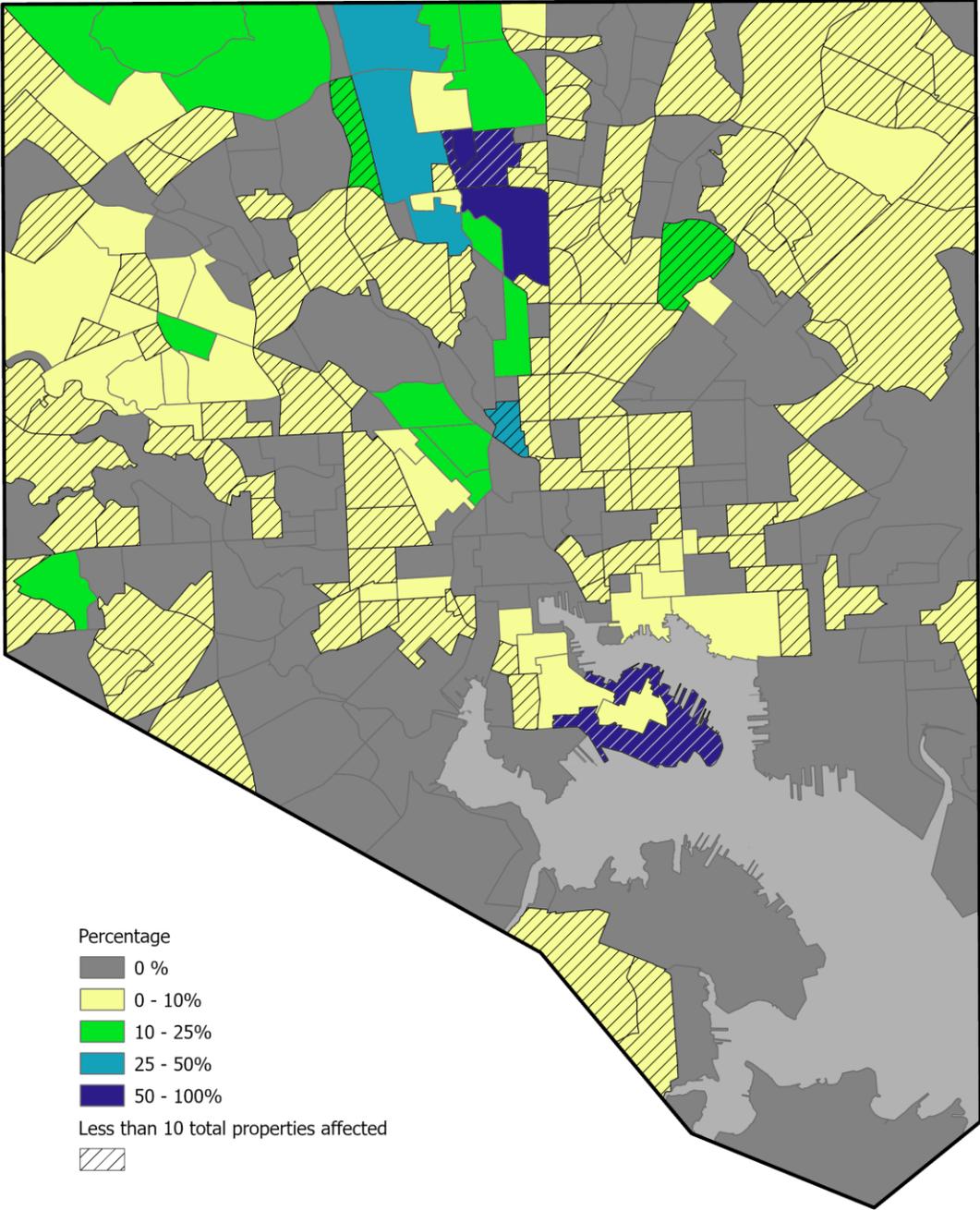
Percent of current single family residential dwellings that will be eligible for conversion to 2 units in R-1 to R-8 zones, by neighborhood



Percent of current single family residential dwellings that will be eligible for conversion to 3 units in R-1 to R-8 zones, by neighborhood



Percent of current single family residential dwellings that will be eligible for conversion to 4 units in R-1 to R-8 zones, by neighborhood



CITY OF BALTIMORE

BRANDON M. SCOTT
Mayor



DEPARTMENT OF LAW
EBONY THOMPSON
CITY SOLICITOR
100 N. HOLLIDAY STREET
SUITE 101, CITY HALL
BALTIMORE, MD 21202

November 12, 2025

The Honorable President and Members
of the Baltimore City Council
Attn: Executive Secretary
Room 409, City Hall
100 N. Holliday Street
Baltimore, Maryland 21202

Re: City Council Bill 25-0066 – Zoning – Housing Options and Opportunity

Dear President and City Council Members:

The Law Department has reviewed City Council Bill 25-0066 for form and legal sufficiency. The bill would create a new multi-family dwelling category as “Dwelling: Multi-Family (Low Density)”, meaning a dwelling containing no fewer than two and no more than four dwelling units. The bill would permit these multi-family dwellings by right in the current detached and semi-detached single-family residential districts (R-1 through R-4) and remove the prohibition on converting single-family dwellings into multi-family dwellings in those districts.

The bill would also permit these multi-family dwellings by right in certain rowhouse and multi-family residential districts (R-5 through R-8), as well as in the office residential district (OR). Additionally, the bill would repeal restrictions on residential conversions in the R-7 through R-10 districts, commercial districts, and office residential districts, including eliminating design review when exterior modifications are proposed for residential conversions in the R-7 through R-10 districts. Finally, the bill would add the new multi-family dwelling category to various bulk and yard regulations in the relevant zoning tables and establish minimum enclosed gross floor area regulations for those dwellings.

The City’s planning and zoning powers have been delegated to it by the General Assembly. *See, e.g., Cnty. Council of Prince George's Cnty. v. Robin Dale Land LLC*, 491 Md. 105, 116 (2025); *County Council of Prince George's County v. Zimmer Dev. Co.*, 444 Md. 490, 504 (2015) (“Under Maryland's constitutional scheme, a local government's authority to regulate land use may emanate only from enabling legislation of the General Assembly.”). In relevant part, the General Assembly has granted the City the power to regulate “the location and use of buildings, signs, structures, and land” in order to promote the health, safety, and general welfare of the community. Md. Code, Land Use (“LU”) § 10-202(6).

Typically, in Maryland, “Euclidean zoning laws are applied to properties located in zoning districts through three legislative zoning processes: 1) original zoning; 2) comprehensive rezoning; and 3) piecemeal rezoning.” *Robin Dale Land LLC*, 491 Md. at 117-18 (internal quotation marks

and citation removed). “An essential feature of a comprehensive rezoning is that it typically results in some affected properties being upzoned or downzoned—that is, placed in a different zone that permits entirely different land uses, *or the same types of uses but at higher or lower intensities.*” *Id.* at 118 (emphasis added). “[I]t is unsurprising that substantive changes in zoning reclassifications occur during a comprehensive rezoning because the process is preceded by a period of study involving a substantial area, which considers current and future land use needs and the public interest.” *Id.*

This bill, in effect, upzones the R-1 through R-4 residential districts by increasing the permitted density. Although the bill does not rezone these districts *per se*, it nonetheless enacts a text amendment to the zoning code that substantially increases the intensity of the permitted uses within them—from single-family dwellings to multi-family dwellings with up to four units. This type of substantial change to the underlying districts resembles those that might result from a comprehensive rezoning, but no such rezoning has occurred here. *See, e.g., Mayor & Council of Rockville v. Rylyns Enters., Inc.*, 372 Md. 514, 535 (2002) (setting forth the requirements of comprehensive rezoning, including: that it cover a substantial area; be the product of careful study; accord with present and planned future conditions, consistent with the public interest; and regulate all permitted land uses in a substantial portion of the political subdivision, though it need not result in substantial rezoning).

If challenged, it is possible a court could view this kind of text amendment as effecting a change to underlying zoning districts that is more appropriate for comprehensive rezoning, including its more substantial notice requirements. *See* City Code, Art. 32, § 5-601(b)(3) (requiring notice by posting in conspicuous places within and around the subject area or district(s), as well as by first-class mailing to each property owner in the subject district(s)). However, there does not appear to be any authority directly on point that would clearly prohibit a text change like this, so the bill is not facially illegal.

Procedural Requirements

The City Council must consider the following when evaluating changes to the text of the City’s Zoning Code:

- (1) the amendment’s consistency with the City’s Comprehensive Master Plan;
- (2) whether the amendment would promote the public health, safety, and welfare;
- (3) the amendment’s consistency with the intent and general regulations of this Code;
- (4) whether the amendment would correct an error or omission, clarify existing requirements, or effect a change in policy; and
- (5) the extent to which the amendment would create nonconformities.

City Code, Art. 32, § 5-508(c).

Any bill that authorizes a change in the text of the Zoning Code is a “legislative authorization,” which requires that certain procedures be followed in the bill’s passage, including a public hearing. City Code, Art. 32, §§ 5-501; 5-507; 5-601(a). Certain notice requirements apply to the bill. Baltimore City Code, Art. 32, §§ 5-601(b)(1), (c), (e). The bill must be referred to

certain City agencies, which are obligated to review the bill in a specified manner. City Code, Art. 32, §§ 5-504, 5-506. Finally, certain limitations on the City Council's ability to amend the bill apply. City Code, Art. 32, § 5-507(c).

Assuming all procedural requirements are followed, the Law Department can approve the bill for form and legal sufficiency. However, the sponsors may wish to consider the following for purposes of clarity and consistency:

- On page 2, beginning in line 21 with the word "except" and continuing to the end of line 25: It is unclear why "common facilities for residents" needs to be added as an inclusion to the definition, or why that inclusion in paragraph (2) is called an exception to paragraph (1).
- Consider updating the relevant descriptions of detached and semi-detached residential districts in Subtitle 2 of Title 8 of Article 32. Currently, those districts refer only to buildings that contain single dwelling units, but if this bill passes, those districts will now permit low density multi-family dwellings.

Sincerely,



Jeffrey Hochstetler
Chief Solicitor

cc: Ebony Thompson, Acting City Solicitor
Ty'lor Schnella, Mayor's Office of Government Relations
Hilary Ruley, Chief Solicitor, General Counsel Division
Ashlea Brown, Chief Solicitor
Michelle Toth, Assistant Solicitor
Desireé Luckey, Assistant Solicitor

BALTIMORE CITY COUNCIL



LAND USE & TRANSPORTATION COMMITTEE

25-0066

Housing Options and Opportunities

Additional Materials

**AMENDMENTS TO COUNCIL BILL 25-0066
(1st Reader Copy)**

By: Mayor’s Office of Government Relations
{To be offered to the Land Use and Transportation Committee}

Amendment No. 1

On page 1, in line 10, strike “Section” and substitute “Sections”; and, on that same page, in line 16, strike “1-305(r) and 1-309(i)” and substitute “1-305(r), 1-309(i), 3-202(o), and 3-206”; and, on page 2, after line 28, insert:

“Title 3. Outline of Code Administration

Subtitle 2. Administrative Agencies and Officials

§ 3-202. Board of Municipal and Zoning Appeals

(O) ANNUAL REPORT.

(1) IN GENERAL.

THE BOARD SHALL SUBMIT AN ANNUAL REPORT TO THE MAYOR AND CITY COUNCIL ON THE BOARD’S ACTIVITIES.

(2) REQUIRED CONTENT.

THE REPORT REQUIRED IN PARAGRAPH (1) OF THIS SUBSECTION SHALL INCLUDE:

(I) THE TOTAL NUMBER OF APPROVALS OF CONDITIONAL USE CONVERSIONS FOR ALL MULTI-FAMILY DWELLINGS OF MORE THAN 2 UNITS IN THE PREVIOUS CALENDAR YEAR;

(II) THE TOTAL NUMBER OF APPROVALS FOR A CONDITIONAL USE OF A MULTI-FAMILY DWELLING IN A NEW BUILDING IN THE PREVIOUS CALENDAR YEAR;

(III) THE TOTAL NUMBER OF DENIALS OF CONDITIONAL USE CONVERSIONS FOR ALL MULTI-FAMILY DWELLINGS OF MORE THAN 2 UNITS IN THE PREVIOUS CALENDAR YEAR AND THE REASON FOR EACH DENIAL; AND

(IV) THE TOTAL NUMBER OF DENIALS FOR A CONDITIONAL USE OF A MULTI-FAMILY DWELLING IN A NEW BUILDING IN THE PREVIOUS CALENDAR YEAR AND THE REASON FOR EACH DENIAL.

§ 3-206. TRIENNIAL REPORT.

(A) REPORT REQUIRED.

THE PLANNING COMMISSION AND THE DIRECTOR OF PLANNING SHALL REPORT NO LESS THAN TRIENNIALLY TO THE MAYOR AND CITY COUNCIL ON LOW-DENSITY MULTI-FAMILY DWELLING USES.

(B) CONTENTS OF REPORT.

THE REPORT REQUIRED UNDER THIS SECTION SHALL INCLUDE:

- (1) THE NUMBER OF BUILDINGS CONSTRUCTED FOR THE PURPOSE OF A LOW-DENSITY MULTI-FAMILY DWELLING USE DURING THE REPORTING PERIOD;
- (2) THE NUMBER OF BUILDINGS APPROVED FOR A CONDITIONAL USE CONVERSION TO A LOW-DENSITY MULTI-FAMILY DWELLING USE DURING THE REPORTING PERIOD;
- (3) THE NUMBER OF UNITS IN EACH BUILDING CONSTRUCTED AS, OR CONVERTED TO, A LOW-DENSITY MULTI-FAMILY DWELLING USE DURING THE REPORTING PERIOD;
- (4) THE GROSS FLOOR AREA OF EACH UNIT CREATED AS A RESULT OF CONSTRUCTION OR CONVERSION TO A LOW-DENSITY MULTI-FAMILY DWELLING USE DURING THE REPORTING PERIOD;
- (5) THE ZONING DISTRICT, COUNCIL DISTRICT, AND NEIGHBORHOOD WHERE EACH LOW-DENSITY MULTI-FAMILY DWELLING UNIT CREATED DURING THE REPORTING PERIOD IS LOCATED; AND
- (6) A RECOMMENDATION ON WHETHER TO CONTINUE OR MODIFY THE STATUS OF LOW-DENSITY MULTI-FAMILY DWELLINGS AS A PERMITTED OR CONDITIONAL USE.

(C) DATA COLLECTION AND PRESERVATION.

THE DIRECTOR OF PLANNING AND THE COMMISSIONER OF HOUSING AND COMMUNITY DEVELOPMENT SHALL ENSURE THAT ALL DATA NECESSARY FOR THE REPORT REQUIRED UNDER THIS SECTION OF THIS SECTION ARE COLLECTED AND PRESERVED.”.

Amendment No. 2

On page 1, in line 10, strike “Section 8-201,” and substitute “Sections 8-201 and 15-501(b),”; and, on that same page, in lines 10 and 11, strike “and Table 12-301” and substitute “Table 12-301, and Table 15-601”; and, on that same page, in line 16, strike “1-305(r) and 1-309(i)” and substitute “1-302(b), 1-305(r), 1-309(i), and 15-502”; and, on that same page in line 21, after the first instance of “Sections”, insert “1-302(b) through (w), respectively, to be Sections 1-302(c) through (x), respectively, Sections,”; and, on that same page, in line 23, strike “and”; and, on that same page, in line 24, strike “respectively” and substitute “respectively, and Sections 15-502 through 15-518, respectively, to be Sections 15-503 through 15-519, respectively”; and, on page 2, after line 16, insert:

“§ 1-302. “Abut” to “Awning”.

(B) ACCESSORY DWELLING UNIT.

(1) IN GENERAL.

“ACCESSORY DWELLING UNIT” MEANS A DWELLING UNIT THAT IS:

- (I) LOCATED ON THE SAME LOT AS A PRINCIPAL DWELLING;
- (II) SUBORDINATE IN USE TO THE PRINCIPAL DWELLING; AND
- (III) NO GREATER THAN 75% OF THE FLOOR AREA OF THE PRINCIPAL DWELLING.

(2) INCLUSIONS.

“ACCESSORY DWELLING UNIT” INCLUDES A DWELLING UNIT THAT IS:

- (I) A SEPARATE STRUCTURE FROM THE PRINCIPAL DWELLING; OR
- (II) ATTACHED TO THE PRINCIPAL DWELLING.”;

and, on page 3, after line 18, insert:

“Title 15. Site Development Standards

Subtitle 5. Accessory Structures and Uses

§ 15-501. General regulations.

(b) Maximum coverage of required rear yard.

[The] UNLESS OTHERWISE PERMITTED OR RESTRICTED BY THIS SUBTITLE, THE total area of all accessory structures may not occupy more than 50% of the area of a required rear yard.

§ 15-502. DWELLING UNIT.

(A) MAXIMUM HEIGHT.

THE MAXIMUM HEIGHT OF AN ACCESSORY DWELLING UNIT IS THE LESSER OF:

- (1) THE MAXIMUM BUILDING HEIGHT ALLOWED BY THE ZONING DISTRICT OF THE LOT; OR
- (2) THE ACTUAL HEIGHT OF THE PRINCIPAL DWELLING ON THE LOT.

(B) OTHER BULK AND YARD REQUIREMENTS.

AN ACCESSORY DWELLING UNIT MAY OCCUPY THE AREA OF REAR YARD AND PERVIOUS SURFACE REQUIRED IN THE ZONING DISTRICT.”;

and, on page 8, after line 15, insert:

<i>Table 15-601: Permitted Encroachments into Required Yards</i>			
<u>Permitted Encroachments</u>	<u>Front Yard/ Corner-Side Yard</u>	<u>Interior-Side Yard</u>	<u>Rear Yard</u>
<u>...</u>			
<u>ACCESSORY DWELLING UNIT</u>			<u>X</u>
<u>...</u>			

Amendment No. 3

On page 4, in line 7, in columns 2 through 10, respectively, in each instance, strike “P” and substitute “P³, CB⁴”; and, on that same page, after line 9, insert:

...

³ APPLIES TO A DWELLING WITH 2 DWELLING UNITS.

⁴ APPLIES TO A DWELLING WITH 3 OR 4 DWELLING UNITS.

and, on page 5, in line 19, in columns 2 through 5, respectively, in each instance, strike “P” and substitute “P³, CB⁴”; and, on that same page, after line 21, insert:

...

³ APPLIES TO A DWELLING WITH 2 DWELLING UNITS.

⁴ APPLIES TO A DWELLING WITH 3 OR 4 DWELLING UNITS.

and, on page 8, in line 10, in column 2, strike “P” and substitute “P¹, CB²”; and, on that same page, after line 15, insert:

¹ APPLIES TO A DWELLING WITH 2 DWELLING UNITS.

² APPLIES TO A DWELLING WITH 3 OR 4 DWELLING UNITS.

Amendment No. 4

On page 6, in line 2, strike “⁸” and substitute “¹⁰”; and, on that same page, in line 19, in columns 2 and 3, respectively, strike “40%” and “45%”, respectively, and substitute “50%” and “60%”, respectively; and, on that same page, in that same line, in column 5, after “80%” insert “or 100%⁴”; and, on page 7, strike lines 3 through 6 in their entirety and substitute:

<u>Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)</u>	<u>10 feet or none⁸</u>	<u>10 feet or none⁸</u>	<u>5 feet or none⁸</u>	<u>5 feet or none⁸</u>	<u>5 feet or none⁸</u>	<u>5 feet or none⁸</u>
---	--	--	---------------------------------------	---------------------------------------	---------------------------------------	---------------------------------------

and, on that same page, strike lines 10 through 13 in their entirety and substitute:

<u>Dwelling: Multi-Family</u> <u>OR MULTI-FAMILY</u> <u>(LOW DENSITY)</u>	<u>10 feet</u>	<u>10 feet</u>	<u>5 feet</u>	<u>None</u>	<u>15 feet</u>	<u>None</u>
---	----------------	----------------	---------------	-------------	----------------	-------------

and, on that same page, strike lines 17 through 20 in their entireties and substitute:

<u>Dwelling: Multi-Family</u> <u>OR MULTI-FAMILY</u> <u>(LOW DENSITY)</u>	<u>25 feet</u>	<u>25 feet</u>	<u>25 feet</u>	<u>16 feet</u> <u>or none⁹</u>	<u>10 feet</u>	<u>10 feet</u>
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and, on that same page, in line 34, strike “8” and substitute “10”.

**AMENDMENTS TO COUNCIL BILL 25-0066
(1st Reader Copy)**

By: Councilmember Parker
{To be offered to the Land Use and Transportation Committee}

Amendment No. 1

On page 4, in line 8, in columns 2, 3, 4, 5, 6, 7, 8, 9 and 10, in each instance, strike “P” and substitute “P³, CB⁴”; and, on that same page, after line 9, insert:

...

³ APPLIES TO A PROPERTY WITH 2 DWELLING UNITS.

⁴ APPLIES TO A PROPERTY WITH 3 OR 4 DWELLING UNITS.

and, on page 5, in line 19, in columns 2, 3, 4, and 5, in each instance strike “P” and substitute “P³, CB⁴”; and, on that same page, after line 21, insert:

...

³ APPLIES TO A PROPERTY WITH 2 DWELLING UNITS.

⁴ APPLIES TO A PROPERTY WITH 3 OR 4 DWELLING UNITS.

Amendment No. 2

On page 1, in line 10, after “8-201,” insert “14-327,”; and, on that same page, in line 16, strike “1-305(r) and 1-309(i)” and substitute “1-304(g), 1-305(r), and 1-309(i)”; and, on that same page, in line 21, after the first instance of “Sections” insert “1-304(g) through (z), respectively, to be Sections 1-304(h) through (aa), respectively, Sections”; and, on page 2, after line 6, insert:

“SECTION 1. BE IT ORDAINED BY THE MAYOR AND CITY COUNCIL OF BALTIMORE, That, of Article 32 - Zoning of the Baltimore City Code, Sections 1-304(g) through (z), respectively, be renumbered to be Sections 1-304(h) through (aa), respectively, Sections 1-305(r) through (cc), respectively, be renumbered to be Sections 1-305(s) through (dd), respectively, Sections 1-309(i) through (v), respectively, be renumbered to be Sections 1-309(j) through 1-309(w), respectively, and Sections 4-405(a)(6) through 4-405(a)(16), respectively, be renumbered to be Sections 4-405(a)(5) through 4-405(a)(15), respectively.”;

and, on that same page, in line 7, strike “SECTION 1. BE IT ORDAINED BY THE MAYOR AND CITY COUNCIL OF BALTIMORE,” and substitute “SECTION 2. AND BE IT FURTHER ORDAINED.”; and, on that same page, in line 11 strike “SECTION 2. BE IT ORDAINED BY THE MAYOR AND CITY COUNCIL OF BALTIMORE,” and substitute “SECTION 3. AND BE IT FURTHER ORDAINED.”; and, on page 8, in line 16, strike “3.” and substitute “4.”; and, on page 2, after line 16, insert:

“§ 1-304. “Chimney” to “Day-care center: Child”.

(G) COMMUNITY-ACCESSIBLE TRANSIT.

(1) IN GENERAL.

“COMMUNITY-ACCESSIBLE TRANSIT” MEANS A PUBLIC TRANSIT VEHICLE THAT ABIDES BY ROUTE SERVICE INTERVALS THAT ARE NO LONGER THAN 15 MINUTES DURING PEAK COMMUTING HOURS.

(2) INCLUSIONS.

“COMMUNITY-ACCESSIBLE TRANSIT” INCLUDES:

(I) A BUS ROUTE; AND

(II) A PASSENGER RAILWAY ROUTE USED BY THE MARYLAND TRANSIT ADMINISTRATION FOR MARYLAND AREA REGIONAL COMMUTER TRAIN SERVICE, LIGHT RAILLINK, AND METRO SUBWAY LINK.”;

and, on page 3, after line 18, insert:

“Title 14. Use Standards

Subtitle 3. Use Standards

§ 14-327. Multi-family [dwellings – Accessory non-residential uses.] DWELLINGS.

(a) Accessory non-residential [uses allowed.] USES.

(1) IN GENERAL.

A multi-family dwelling containing 50 or more dwelling units in the R-8, R-9, R-10, and OR-2 Districts may contain the following non-residential uses:

(I) [(1)] Offices.

(II) [(2)] Personal service establishments.

(III) [(3)] Retail goods establishments – no alcoholic beverage sales.

(IV) [(4)] Restaurants.

(2) [(b)] Uses limited to building interior.

These uses must be conducted entirely inside the building.

(3) [(c)] Aggregate area of uses.

The aggregate area of these uses may not exceed the following:

(I) [(1)] in the R-8 and R-9 Districts, 5% of the gross floor area of the building; and

(II) [(2)] in the R-10 and OR-2 Districts, the greater of:

(A) [(i)] 10% of the gross floor area of the building; or

(B) [(ii)] if all these uses are located exclusively on the ground floor of the building, the floor area of the entire ground floor.

(4) [(d)] Signs.

Signs must comply with Title 17 {“Signs”} of this Code.

(B) MULTI-FAMILY (LOW DENSITY).

A MULTI-FAMILY (LOW DENSITY) USE MAY BE PERMITTED ONLY IF THE PROPERTY IS LOCATED WITHIN 1,000 FEET FROM COMMUNITY-ACCESSIBLE TRANSIT.”.

and, on page 4, in line 8, in column 11, insert “PER § 14-327”.

Amendment No. 3

On page 1, in line 10, after “8-201,” insert “14-327,”; and, on page 3, after line 18, insert:

“Title 14. Use Standards

Subtitle 3. Use Standards

§ 14-327. Multi-family [dwellings – Accessory non-residential uses.] DWELLINGS.

(a) Accessory non-residential [uses allowed.] USES.

(1) IN GENERAL.

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(I) [(1)] Offices.

(II) [(2)] Personal service establishments.

(III) [(3)] Retail goods establishments – no alcoholic beverage sales.

(IV) [(4)] Restaurants.

(2) [(b)] Uses limited to building interior.

These uses must be conducted entirely inside the building.

(3) [(c)] Aggregate area of uses.

The aggregate area of these uses may not exceed the following:

(I) [(1)] in the R-8 and R-9 Districts, 5% of the gross floor area of the building; and

(II) [(2)] in the R-10 and OR-2 Districts, the greater of:

(A) [(i)] 10% of the gross floor area of the building; or

(B) [(ii)] if all these uses are located exclusively on the ground floor of the building, the floor area of the entire ground floor.

(4) [(d)] Signs.

Signs must comply with Title 17 {"Signs"} of this Code.

(B) MULTI-FAMILY (LOW DENSITY).

A MULTI-FAMILY (LOW DENSITY) USE MAY BE PERMITTED ONLY IF THE PROPERTY IS OWNER-OCCUPIED.”.

and, on page 4, in line 8, in column 11, insert “PER § 14-327”.

Amendment No. 4

On page 6, in line 2, strike “⁸” and substitute “¹⁰”; and, on that same page, in line 19, in columns 2 and 3, respectively, strike “40%” and “45%”, respectively, and substitute “50%” and “60%”, respectively; and, on that same page, in that same line, in column 5, after “80%” insert “or 100%⁴”; and, on page 7, strike lines 3 through 6 in their entirety and substitute:

<u>Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)</u>	<u>10 feet or none⁸</u>	<u>10 feet or none⁸</u>	<u>5 feet or none⁸</u>	<u>5 feet or none⁸</u>	<u>5 feet or none⁸</u>	<u>5 feet or none⁸</u>
---	--	--	---------------------------------------	---------------------------------------	---------------------------------------	---------------------------------------

and, on that same page, strike lines 10 through 13 in their entirety and substitute:

<u>Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)</u>	<u>10 feet</u>	<u>10 feet</u>	<u>5 feet</u>	<u>None</u>	<u>15 feet</u>	<u>None</u>
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and, on that same page, strike lines 17 through 20 in their entirety and substitute:

<u>Dwelling: Multi-Family</u> <u>OR MULTI-FAMILY</u> <u>(LOW DENSITY)</u>	<u>25 feet</u>	<u>25 feet</u>	<u>25 feet</u>	<u>16 feet</u> <u>or none⁹</u>	<u>10 feet</u>	<u>10 feet</u>
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and, on that same page, in line 34, strike “8” and substitute “10”.

**AMENDMENTS TO COUNCIL BILL 25-0066
(1st Reader Copy)**

By: Councilmember Parker
{To be offered to the Land Use and Transportation Committee}

Amendment No. 1

On page 4, in line 8, in columns 2, 3, 4, 5, 6, 7, 8, 9 and 10, in each instance, strike “P” and substitute “P³, CB⁴”; and, on that same page, after line 9, insert:

...
³ APPLIES TO A PROPERTY WITH 2 DWELLING UNITS.
⁴ APPLIES TO A PROPERTY WITH 3 OR 4 DWELLING UNITS.

and, on page 5, in line 19, in columns 2, 3, 4, and 5, in each instance strike “P” and substitute “P³, CB⁴”; and, on that same page, after line 21, insert:

...
³ APPLIES TO A PROPERTY WITH 2 DWELLING UNITS.
⁴ APPLIES TO A PROPERTY WITH 3 OR 4 DWELLING UNITS.

Amendment No. 2

On page 6, in line 2, strike “⁸” and substitute “¹⁰”; and, on that same page, in line 19, in columns 2 and 3, respectively, strike “40%” and “45%”, respectively, and substitute “50%” and “60%”, respectively; and, on that same page, in that same line, in column 5, after “80%” insert “or 100%⁴”; and, on page 7, strike lines 3 through 6 in their entireties and substitute:

<u>Dwelling: Multi-Family OR MULTI-FAMILY (LOW DENSITY)</u>	<u>10 feet or none⁸</u>	<u>10 feet or none⁸</u>	<u>5 feet or none⁸</u>	<u>5 feet or none⁸</u>	<u>5 feet or none⁸</u>	<u>5 feet or none⁸</u>
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and, on that same page, in line 34, strike “8” and substitute “10”.

**AMENDMENTS TO COUNCIL BILL 25-0066
(1st Reader Copy)**

By: Councilmember Parker
{To be offered to the Land Use and Transportation Committee}

Amendment No. 1

On page 1, in line 10, strike “Section 8-201” and substitute “Sections 8-201 and 9-701”; and, on page 2, strike in their entirety lines 3 and 4 and substitute “Sections 4-405(a)(5), 10-609, and 12-303(i)”; and, on that same page, after line 6, insert:

“BY repealing and re-ordaining, without amendments,
Article 32 - Zoning
Sections 9-702 and 9-703
Baltimore City Code
(Edition 2000)”;

and, on that same page, in strike beginning with “Sections” in line 8 down through and including the first instance of “and” in line 9; and, on page 3, after line 18, insert:

“Title 9. Rowhouse and Multi-Family Residential Districts

Subtitle 7. Residential Conversions

§ 9-701. Where allowed.

In the [Residence] RESIDENTIAL Districts, the conversion of a single-family dwelling to a multi-family dwelling is allowed only in the R-7, R-8, R-9, and R-10 Districts, subject to:

- (1) the requirements of this subtitle; and
- (2) in the R-7 and R-8 Districts, conditional-use approval by [Ordinance of the Mayor and City Council.] THE BOARD OF MUNICIPAL AND ZONING APPEALS.

§ 9-702. Design review.

(a) In general.

Design review approval is required if exterior modifications are proposed.

(b) Construction drawings and plans.

As part of the submittal for design review, construction drawings and plans that describe the proposed conversion in detail are required.

§ 9-703. Conversion standards.

(a) In general.

All conversions must meet the standards set forth in this section.

(b) Bulk and yard regulations.

The dwelling must continue to conform to the applicable bulk and yard regulations, including lot area per dwelling unit, for the district in which the building is located.

(c) Occupancy regulations.

No residential conversion may violate any dwelling unit occupancy regulations or restrictions of the City Code.

(d) Residential character.

Following the conversion, the exterior of the dwelling must retain its existing residential character.”;

and, on page 5, after line 18, insert:

Dwelling: Multi-Family	P	P	P ³	P ³	P	P	Per § 14-327
------------------------	---	---	----------------	----------------	---	---	--------------

and, on that same page, after line 21, insert:

³ Per § 9-701, conversion of a existing structure is conditional on the approval of the Board of <u>Municipal and Zoning Appeals.</u>
--

Amendment No. 2

On page 5, in line 19, in columns 4 and 5, in each instance strike “P”.

BALTIMORE CITY COUNCIL



LAND USE & TRANSPORTATION COMMITTEE

25-0066

Housing Options and Opportunities

PUBLIC TESTIMONY

Leva, Anthony F (City Council)

From: Tanisha N. Jones <tanishanjones@coralacre.com>
Sent: Wednesday, February 11, 2026 9:00 PM
To: Testimony; City Council President; Parker, Mark (City Council); McCray, Danielle (City Council); rdorsey; Conway, Mark (City Council); Schleifer, Isaac (City Council); Middleton, Sharon (City Council); Torrence, James (City Council); Gray, Paris (City Council); Bullock, John (City Council); Porter, Phylcia R.L. (City Council); Blanchard, Zachary (City Council); Jones, Jermaine (City Council); Glover, Antonio (City Council); Ramos, Odette (City Council); Scott, Brandon (Mayor); Brandon M Scott; Henry, Ashelle (Mayor's Office); Leva, Anthony F (City Council)
Subject: My 0066 position

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My position on 0066 is still the same. There has been nothing the City Council and the Mayor have done to increase housing affordability, protect legacy residents, and combat wage stagnation in this bill. Plus, I was informed that multiple amendments were released this evening. Unless you are a super reader and have supernatural comprehension skills - there is no way you can vet these amendments before the Land Use committee tomorrow. And it is undemocratic to release these amendments so late and not take additional public testimony.

Plus there are the procedural and equity issues with this bill and most of the housing package.

Please add this letter this letter to the bill file.

Thank you, Tanisha | Super Voter | Registered Democrat | Socialist | District 3

Leva, Anthony F (City Council)

From: Darden Ann Bennett <dardenann@hotmail.com>
Sent: Tuesday, December 2, 2025 2:01 PM
To: Testimony
Subject: 25-0066 written testimony of Darden Ann Bennett

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From: Darden Ann Bennett <dardenann@hotmail.com>
Sent: Tuesday, December 2, 2025 10:17 AM
To: Darden Ann Bennett <dardenann@hotmail.com>
Subject: 250066 draft

My name is Darden Ann Bennett, a white professional, who lives in the 2 District on Ridgeview Avenue in Glenham Belhar for 40 years. As a lifelong city resident, I am dedicated to, and love Baltimore. My family lived in Harlem Park for generations since before 1870. My father from Harlem Park, later moved to Rosemon East, where I grew up and got an excellent education in the Baltimore City public schools.

First, would like to thank and praise my representative, Councilwoman Danielle McCray for her commitment, professionalism, competency, and work in public service serving the 2nd district, and voting no against the overlay bill. I applaud her challenging, and hopefully voting NO to 25-0066! She has my vote!

Thank you, Councilwoman Middleton, for challenging this bill, processes, and listening to constituents! Please keep up the good work!

For the sake of brevity, I'll simply state I am vehemently opposed to 25-0066. I am in agreement with all of the opinions voiced by the large opposition group at Mondays hearing. I dismiss the small pro legislation groups testimony, which showed ignorance, incompetence, and intolerance of fairness, in the aspect of public service, which requires listening and acting upon constituents concerns and comments. The citizens who testified and were dismissed by the gentleman who testified "pro" as "elderly" have life experience, and wisdom. Council persons supporting this bill are blind to the fact that this bill is stirring a venomous feeling of racial unfairness among the black community, talk of toxic white males, while touting it is eliminating obstacles, for the black community. Bill 25-0066 needs to be at the very minimum halted. It should

never pass. It is legislation that will destroy the remaining life Baltimore, a dying city, has, and be regaled in future history as a critical failure Baltimore.

Please the YouTube video (not short) Baltimore Maryland Hoods / 4th Most dangerous city in America by City2CityUSA. Look at the dead neighborhoods. My feeling is to reclaim these neighborhoods, bring life to them which includes housing. It is already successfully being done. See the Baltimore Sun, November 29 page 2 article by Jacques Kelly titled Economic boost for West North Avenue. I applaud and am overjoyed by the success this project is having. In 2015, I purchased one of a few "Fannie Mae" dilapidated vacants in the 1000 block of Bennett Place, and renovated it over a period of years from from savings, trying in my own small way to restore and breathe future life into my family's legacy Harlem Park neighborhood. Fortunately, others in the 1000 block did the same, and today the block has been saved to become a nice block! Let's bring this type of housing to Baltimore! NOT 25-0066!

Thank you.

Sincerely,

Darden Ann Bennett
6111 Ridgeview Avenue
Baltimore, Maryland 21206-2448
443-388-1184

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Leva, Anthony F (City Council)

From: Jessica Dailey <jessica.dailey@compass.com>
Sent: Tuesday, December 2, 2025 12:18 PM
To: Testimony
Subject: Submit for testimony - Opposition to CCB 25-0066

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Council Members,

I'm writing to strongly oppose CCB 25-0066. I've been selling real estate in Baltimore City for the past 20 years, and I'm also a long-time resident and a landlord here. I've seen firsthand what happens when rowhomes are subdivided into multiple units without proper oversight, accountability, or long-term investment.

Even licensed apartments are not being maintained properly in many cases. Allowing even more conversions—up to four units per rowhouse—will only intensify those problems. This change would dramatically alter the character and stability of many neighborhoods, and it opens the door for more absentee landlords who treat Baltimore as an investment play, not a community they're responsible to.

Baltimore doesn't need more poorly maintained multi-unit conversions; we need stronger enforcement, higher standards, and owners who actually live in or care for their properties. This bill moves us in the opposite direction.

For these reasons, I urge you to reject CCB 25-0066.

Thank you for your attention to this historically important matter.

-Jessica Dailey

Real Estate Agent @Compass

Owner of CookHouse & On The Hill Cafe

Baltimore City Resident

JESSICA DAILEY

Realtor® CRS GRI ABR

m: 443-838-8204 o: 410-886-7342

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LET'S SCHEDULE A MEETING!

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Leva, Anthony F (City Council)

From: Rosalie Eck <rosalie.eck@gmail.com>
Sent: Thursday, December 18, 2025 3:13 PM
To: Testimony
Subject: Our Concerns Were Ignored | SB-25-14430 & SB-25-14361

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To the Committee responsible for hearing testimony on this bill:

My name is **Rosalie Eck**, and I am a resident of **Charles Village 21218** and I work in **Hampden 21211**.

I am writing to express serious concern and disappointment over the City Council's decision to advance **SB-25-14430** and **SB-25-14361**, despite clear, widespread opposition voiced by Baltimore residents at yesterday's hearing.

Community members did not simply "participate." We warned of real harms and asked the Council to slow down. I see my neighbors working to share our message of concern in signage, with rallies, petitions and organizing.

I attended the rally outside City Hall on Monday while community members attempted to deliver their petition to Council President Zeke Cohen and have our concerns heard.

However, our concerns were ignored, and the decision to move forward makes it difficult to believe that the City Council and its President is acting in the best interests of the people who live here.

When legislation affecting land use, environmental health, and neighborhood stability moves ahead against strong public opposition, it sends a clear message that community voices are not being respected.

I urge you to:

- Halt further advancement of **SB-25-14430 and SB-25-14361**
- Commit to additional, meaningful public engagement
- Demonstrate that resident concerns influence outcomes, not just the record

Baltimore residents deserve leadership that listens, responds, and prioritizes the well-being of the communities it serves.

Sincerely,

Rosalie Eck

Charles Village, 21218



Leva, Anthony F (City Council)

From: Gerald Fields <gfields321@yahoo.com>
Sent: Tuesday, February 10, 2026 11:57 AM
To: Testimony
Subject: Bill 25-0066

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Good Day,
I am writing this email in opposition of the bill being proposed 25-0066, a zoning bill that would allow single families homes to be redesignated as multifamily homes without any prior approval or request.
The impacts that this will have a far greater than most are able to recognize.
One of the main concerns is that it will put an unnecessary strain on the already burdened and poorly funded school systems.
This bill has the potential to add a substantial amount of children to any school district without the tax revenue increasing proportionately.
The school systems are woefully understaffed and under resourced, and adding addition residents to any area that is already struggling to supply and provide for the current school children would be extremely detrimental.
This is just one issue but a major one.
Other concerns are parking, lack of available parking.
Trash removal and areas to place trash
Safety concerns understaffed police force
Fire concerns, understaffed fire department

all of these things need to be addressed prior to trying to fast track a bill such as this in order to appease developers and other financial institutions that would benefit from the bill that would destroy neighborhoods.

There is a way to address this and that is by looking at all the parameters and requiring some additional changes on the part of the developer or owner of the properties, to provide available parking and to have a tax increase assessed also.

Respectfully Submitted,

Gerald Fields

Leva, Anthony F (City Council)

From: Peter Griffith <pcgriffith@mac.com>
Sent: Friday, December 26, 2025 12:27 PM
To: Testimony
Subject: Fwd: Our Concerns Were Ignored | SB-25-14430 & SB-25-14361

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I would like to submit my testimony below to be heard by the committee responsible for this bill's movement.

Begin forwarded message:

From: "Cohen, Zeke (City Council)" <Zeke.Cohen@baltimorecity.gov>
Subject: Re: Our Concerns Were Ignored | SB-25-14430 & SB-25-14361
Date: December 22, 2025 at 10:06:55 EST
To: Peter Griffith <pcgriffith@mac.com>

Good morning,

Thank you for reaching out. If you would like to submit your testimony to be heard by the committee responsible for this bill's movement. Please do so here: testimony@baltimorecity.gov .

Best,
Hailey Kancherla

Office of the Baltimore City Council President Zeke Cohen
Baltimore City Council
100 Holliday Street, Room 400
Baltimore, MD 21202
Office: (410) 396-4804

From: Peter Griffith <pcgriffith@mac.com>
Sent: Thursday, December 18, 2025 3:04 PM
To: Cohen, Zeke (City Council) <Zeke.Cohen@baltimorecity.gov>
Subject: Our Concerns Were Ignored | SB-25-14430 & SB-25-14361

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Dear Council President Cohen,

My name is Peter Griffith, I am a resident of Mt. Washington (21209), and I was a supporter of your candidacy for council president. I have also previously contacted your office expressing my opposition to these bills.

I am writing to express serious concern and disappointment over the City Council's decision to advance SB-25-14430 and SB-25-14361, despite clear, widespread opposition voiced by Baltimore residents at yesterday's hearing.

Community members did not simply "participate". We warned of real harms and asked the Council to slow down. Our concerns were ignored, and the decision to move forward makes it difficult to believe that the City Council President is acting in the best interests of the people who live here.

When legislation affecting land use, environmental health, and neighborhood stability moves ahead against strong public opposition, it sends a clear message that community voices are not being respected.

I urge you to:

Halt further advancement of SB-25-14430 and SB-25-14361
Commit to additional, meaningful public engagement
Demonstrate that resident concerns influence outcomes, not just the record
Baltimore residents deserve leadership that listens, responds, and prioritizes the well-being of the communities it serves.

Sincerely,
Peter Griffith
Mt. Washington

Leva, Anthony F (City Council)

From: No_on_zoning_bill_25-0066 <noonzoningbill25006@gmail.com>
Sent: Tuesday, January 6, 2026 12:54 PM
To: Cheryl Hinton
Cc: Middleton, Sharon (City Council); Cohen, Zeke (City Council); Testimony
Subject: Re: I oppose Bill 25-0066

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No_on_zoning_bill_25-0066 reacted via [Gmail](#)

On Mon, Jan 5, 2026 at 6:15 PM Cheryl Hinton <lovespieces@gmail.com> wrote:

I have been a homeowner in Baltimore for over 30 years. I am not just a taxpayer; I am a 30-year investor in this city. I am emailing today because I am appalled by the direction of this legislation.

This bill is a betrayal of every resident who stayed in Baltimore when things were at their worst. It is a gift-wrapped package for outside investors and absentee landlords—including the City itself—at the direct expense of the people who actually live here. Every year, you hike our property taxes without a single shred of grace or relief for long-term homeowners. You sit here and 'wonder' why homeownership is in a death spiral? This is the reason.

Let's be honest about what this does: It destroys the few stable communities we have left. By favoring transient, short-term occupancy over homeownership, you are gutting the civic fabric of our neighborhoods. While wealthy areas remain financially isolated and protected, this bill systematically dismantles the home equity and stability of our middle-class Black neighborhoods.

I have nothing against renters, but there is a fundamental difference between a neighbor and a transient occupant renting a portion of a house. One is vested in the long-term safety and success of the street; the other is passing through. You are trading our community anchors for a revolving door of profit.

You are effectively engineering the death of the middle class in Baltimore. I demand that you stop prioritizing predatory interests over the residents who have stood by this city for decades. Do not pass this bill. Protect the people who actually call Baltimore home.

Thank you.

I VOTE,

Cheryl C. Hinton, your constituent

Leva, Anthony F (City Council)

From: Robin <rkaufman93@gmail.com>
Sent: Thursday, December 18, 2025 1:22 PM
To: Testimony
Subject: Bill 25-0066

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I oppose this bill as written. It would be a significant negative for historical neighborhoods such as Cedarcroft, would greatly affect our home values, and would be a major diminishment to Cedarcroft's historical integrity. I do not want flippers in my neighborhood. *It would also put the bulk of the burden on middle class black families on their way to creating generational wealth. No flippers in their neighborhoods either!*

*Robin Kaufman
415 Cedarcroft Rd
Baltimore 21212
443-848-6376*

Sent from my iPhone

Leva, Anthony F (City Council)

From: Carol Muhammad <carol1muhammad@yahoo.com>
Sent: Thursday, January 1, 2026 11:42 AM
To: Scott, Brandon (Mayor); Scott, Brandon (Mayor); Testimony; noonzoningbill25006@gmail.com
Subject: Saying No to Bill 25-0066!

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Greetings!

Many of my neighbors and other participants of the Howard Park Civic Community Association have discussed this proposed bill and have decided that we are very clearly opposed to it for the following reasons:

1. Repeats past policy mistakes that previously harmed communities!
2. It undermines homeownership, favoring rapid density over neighborhood stability!
3. It weakens Baltimore's healthy neighborhoods' fabric!
4. Undermines years of citizens and the city's investment in homeownership!
5. Incentivizes absentee ownership and not community growth!
6. Expands investor activity without strengthening enforcement!
7. Provides No protections for renters!
8. Does not target vacant housing or promote new construction!
9. Creates policy risk without data, analysis, or comprehensive fiscal review!

We have agreed in principle that our inner city communities should not have to sacrifice for cultural shifts in population into our neighborhood that disregard zoning requirements and ill-affect the quality of our lives.

We are planning to follow-up closely in opposition to this proposed bill. Thank you for every consideration.

Carol Muhammad PMHNP-BC RN

Member of the HPCA

Leva, Anthony F (City Council)

From: nancy <broadns@verizon.net>
Sent: Monday, December 22, 2025 10:13 AM
To: Georgia Corso
Cc: NANCY BROADFOOT; Charles Eddington; cwaldt@verizon.net; Annet Couwenberg; Keith Weaver; Charla Doble; Fran Gerlach; Sue Kessel; Bill Berry; District3; Cohen, Zeke (City Council); Rachel Weaver; Jody Landers; Testimony; Brandon M Scott
Subject: over 700,000. Vacant

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Why NOT start here,,instead of breaking down single family homes- in stable neighborhoods. This property is why people move from the City.

Maryland launches new effort to improve vacant property assessments in Baltimore City

By
Christian Olaniran

Updated on: December 20, 2025 / 7:41 PM EST / CBS Baltimore

[Add CBS News on Google](#)

The state of Maryland launched an initiative Wednesday aimed at improving the accuracy of vacant land assessments in Baltimore City, the State Department of Assessments and Taxation (SDAT) announced. The move comes in response to community feedback about the valuation of vacant homes.

"Baltimore is a city where property values can shift significantly block by block," SDAT Executive Director Bob Yeager said. "That's why we use neighborhood-based market groupings, which capture a more accurate reflection of local conditions and avoid one-size-fits-all solutions. We're prioritizing a full review of vacant land in each reassessment cycle."

What does the initiative include?

The department will methodically identify all properties that have not been developed in the Group 2 reassessment area of Baltimore City. Group 2 refers to a set of residential and commercial properties that are appraised on a three-year cycle by SDAT.

The 2023 reassessment covered 779,573 Group 2 properties, based on sales data from the previous three years.

Integrity checks of sales and property records will be performed to improve data accuracy as part of the initiative, the department said.

As a resident of Historic Cedarcroft, I strongly oppose legislation that would allow the single family homes in Cedarcroft to be subdivided. It would obviously ruin to the historic nature of the neighborhood, threaten historic designation with the National Register of Historic Places, increase parking (already at a premium, as many homes in the 135 unit neighborhood were built without off street parking). The legislation would also violate the neighborhood covenants and restrictions, which specify that homes shall not be subdivided.

The legislation opens the door to speculative developers who will outbid regular home buyers, and who will then subdivide homes with no consideration of neighborhood designation or character and charge high rents for the privilege of living in a historic district (which will not help the affordable home problem). This is bad legislation that will not solve Baltimore housing shortage, but which stands a very good chance of ruining the city's many beautiful, historic, and iconic neighborhoods and driving rents up.

December 23, 2025

To the Baltimore City Council,

I am writing in opposition of the proposed Bill 25-0066 titled 'Zoning Housing Options and Opportunity.' My family moved to Baltimore City two years ago and purchased a home here 6 months ago. We relocated to Baltimore City from the DC suburbs for a number of reasons, but one of the most attractive factors of moving to Baltimore was the possibility of homeownership due to the affordability and the quantity of charming, historic neighborhoods with ample available affordable housing.

The proposed Bill only hurts current and future home owners in Baltimore, especially in the historical neighborhoods. This Bill will only help developers make an initial large monetary gain, as the long-term economy suffers. The work force, and consequently the economy, of Baltimore will diminish if the City is not attractive for families to reside in for the long-term.

If most of the neighboring single family houses were bought by developers and flipped to multi-family renters, my family would have been less enticed to purchase in the area. I am confident many new families looking to relocate to new, vibrant cities feel the same way. This zoning rule will further force homebuyers out of the City and slowly turn it into an unappealing place for families and long-term community members. Many other community organizations are executing efforts in this city to drive out absentee landlords of commercial real estate, as they quickly devolve into smoke shops, liquor stores, and dollar generals. Why would we expect anything different from residential real estate developers?

Sincerely,
Matt Paesch

PARKING
15-MINUTE LIMIT
6 AM - 9 PM
←
PASSENGER LOADING ZONE
NO PARKING DURING
STREET CLEANING HOURS

NO PARKING
THURSDAY
12 NOON - 2 PM
← STREET CLEANING →
TOW-AWAY ZONE

**THIS SIGN IS POSTED. IT'S CLEAR.
YET EVERY THURSDAY, CARS REMAIN.
THE STREET SWEEPER CAN'T CLEAN,
SO RESIDENTS END UP DOING
THE CITY'S JOB.
BEFORE WE TALK ABOUT CITYWIDE UP-ZONING
LET'S FIX BASIC SERVICES FIRST**

FACT SHEET: Key Concerns & Unanswered Questions About Bill 25-0066

(For attachment to Council correspondence and public distribution)

Updated: December 2025

1. The Bill Advanced Without a Required Equity Analysis

Baltimore City law (Article 1, §39-1) mandates a racial equity review for major legislation. Bill 25-0066 was introduced and advanced without this analysis, despite its citywide impact on:

- Housing access
- Neighborhood demographics
- Displacement risk
- Property values
- Investor incentives

A moratorium is necessary to ensure legal compliance and responsible policymaking.

2. Conflicting Narratives About Redlining and Equity

Supporters of the bill publicly claim that eliminating single-family zoning will “undo” the effects of redlining. However, at the December 1 hearing, Councilmember Parker directly rejected this argument, asserting that:

- Redlining was driven by federal lending policies
- Zoning reform alone cannot remedy structural racism
- The bill contains no affirmative equity tools
- Removing restrictions without safeguards may worsen inequities

Video references:

- Councilmember Parker Hearing Clip: <https://www.youtube.com/watch?v=LdMgRUE6qa0&t=6250s>
- Councilman Blanchard WBAL Interview: <https://www.youtube.com/watch?v=pn05YMD9ckw>

3. No Anti-Displacement Protections in the Bill

Nothing in 25-0066 protects:

- Seniors
- Renters
- Legacy Black homeowners
- Households already facing gentrification pressure
- Families at risk of eviction

There are no affordability requirements, rent protections, tax protections, or limits on speculative bulk investor acquisition.

4. Serious Enforcement Gaps Remain Unaddressed

Baltimore City is already overwhelmed by:

- Illegal conversions
- Sanitation failures
- Vacant and unsafe properties

- Insufficient housing inspectors
- Code enforcement backlogs

The bill dramatically increases the number of units allowed by right—yet provides no plan to strengthen enforcement or protect residents from unsafe conditions.

5. The Bill Enables Large-Scale Speculative Investor Activity

During the WBAL interview, concerns were raised about:

- Out-of-state landlords
- Corporate investors
- High-turnover rental operations
- Short-term extraction with no community investment

The interview offered no safeguards against these risks.

Speculative bulk-buying disproportionately targets:

- Black neighborhoods
- Low-income blocks
- Under-resourced communities

6. Key Questions That Remain Unanswered

Residents—and the WBAL interviewer—have repeatedly requested, but not received, answers to:

- How will displacement of renters and seniors be prevented?
- What enforcement capacity exists to police unsafe conversions?
- How will sanitation, parking, traffic, and infrastructure be supported?
- Where is the modeling showing neighborhood-level impact?
- How will affordability be guaranteed when no affordability requirements exist?
- What protections will limit speculative out-of-state investor takeover?
- Why was the bill advanced before the legally required equity analysis was completed?

7. Misalignment Between Public Messaging and the Bill's Actual Effects

Claims made publicly include:

- “This will increase homeownership.”
- “This creates more family-friendly housing options.”
- “This is an equity bill.”

However:

- The bill contains no tools to increase homeownership
- Most added units will be rentals, not ownership
- No affordability requirements exist
- No equity mechanisms exist
- Investors—not families—are best positioned to capitalize financially

8. Why a Moratorium Is Necessary

A moratorium would allow time to:

- Complete the required equity analysis

- Develop anti-displacement protections
- Conduct neighborhood-specific modeling
- Create an enforcement plan
- Establish affordability requirements
- Engage communities in meaningful dialogue
- Ensure transparent and fact-based policymaking

Baltimore cannot afford irreversible mistakes on a citywide zoning overhaul.

Recommendation

The City Council must pause Bill 25-0066 until the City provides:

- A completed and published racial equity analysis
- A displacement-prevention strategy
- A code enforcement staffing and capacity plan
- Accurate public information
- Clear and data-supported responses to community questions

Prepared By:

Charles Williams II

Baltimore City Resident & Community Advocate

The board met on Monday, and we are trying to take swift action to voice our protest to the bill, as it would allow developers/flippers/new home buyers to purchase a house anywhere in the city and redevelop it with up to four separate family units within the one home. This is part of a larger housing bill developed by the mayor's office and councilman Ryan Dorsey. We strongly believe this specific portion of the bill would be a significant negative for historical neighborhoods such as Cedarcroft, would greatly affect our home values, and would be a major diminishment to Cedarcroft's historical integrity.



**THIS SIGN IS POSTED. IT'S CLEAR
YET EVERY THURSDAY, CARS REMAIN
THE SWEEPER CAN'T CLEAN
AND RESIDENTS END UP
DOING THE CITY'S JOB.
BEFORE WE TALK ABOUT CITYWIDE UP-ZONING
LET'S FIX THE BASIC SERVICES ALREADY
FAILING OUR NEIGHBORHOODS**

Leva, Anthony F (City Council)

From: doneill1952 <doneill1952@comcast.net>
Sent: Monday, December 1, 2025 5:06 PM
To: janetallen2011
Cc: Joan Floyd; Kelli Bigelow; Mereida Goodman; Dorsey, Ryan (City Council); Middleton, Sharon (City Council); Gray, Paris (City Council); Porter, Phylicia R.L. (City Council); Bullock, John (City Council); Blanchard, Zachary (City Council); Parker, Mark (City Council); Testimony; Cohen, Zeke (City Council); Brandon M Scott; Schnella, Ty'lor (Mayor's Office); Laurence Campbell; joyce smith; Karen Braden; Arlington West; Arlisa Anderson; Darryn Mobley; Catherine Pugh; Sharon Bradford; George Collins; Jennifer V. Huggins; Nichole' Gatewood; Linda Batts; Mary Hyghes; bettyblandthomas@comcast.net; jodylanders3@gmail.com; thecarecommunityassociation@yahoo.com; reney royster; Cynthia Gross; Tanisha N. Jones; soniaeddy@gmail.com; Coldstream Homestead Montebello; tonwellz@aol.com; Alexius Wilson; Lawrence Bell; Peggy Rice; James and Connie Riley; Keondra Prier; knbeagle@gmail.com; biffordt@gmail.com; dnyweide@yahoo.com; Carolyn Carey; chazwilliamz@gmail.com; ritacrews@verizon.net; info.ica21239@gmail.com; whnathansr@yahoo.com; FredaFanning@gmail.com; LaTayia Wright
Subject: Re: City Council Bill 25-0066_ Letter

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Me. I preregistered and they said no.

Your neighbor, D Roch, also. Plus many more.

Deb
Sent from my iPhone

On Dec 1, 2025, at 4:29 PM, janetallen2011 <janetallen2011@comcast.net> wrote:

Janet Allen

Sent via the Samsung Galaxy S20 FE 5G, an AT&T 5G smartphone

----- Original message -----

From: Joan Floyd <joanfloyd@hotmail.com>

Date: 12/1/25 3:10 PM (GMT-05:00)

To: Kelli Bigelow <kbigelow2011@gmail.com>, Mereida Goodman <mgoodman@go-northwesthrc.org>

Cc: "Dorsey, Ryan (City Council)" <rd@baltimorecity.gov>, sharon.middleton@baltimorecity.gov, paris gray <paris.gray@baltimorecity.gov>, "Porter, Phylcia R.L. (City Council)" <phylcia.porter@baltimorecity.gov>, "Bullock, John (City Council)" <john.bullock@baltimorecity.gov>, "Blanchard, Zachary (City Council)" <zachary.blanchard@baltimorecity.gov>, Mark Parker <mark.parker@baltimorecity.gov>, Testimony <testimony@baltimorecity.gov>, "Cohen, Zeke (City Council)" <zeke.cohen@baltimorecity.gov>, mayor@baltimorecity.gov, "Schnella, Ty'lor (Mayor's Office)" <tylor.schnella@baltimorecity.gov>, Laurence Campbell <lfcrick123@yahoo.com>, JOYCE SMITH <smithjrp@aol.com>, Karen Braden <kbraden410@gmail.com>, Arlington West <westarlington@gmail.com>, Arlisa Anderson <arlisa.anderson@gmail.com>, Darryn Mobley <darryn.mobley@yahoo.com>, Catherine Pugh <cepughco@gmail.com>, Sharon Bradford <forestpkassociation@gmail.com>, George Collins <ETC207@yahoo.com>, "Jennifer V. Huggins" <hugs4j@gmail.com>, Nichole' Gatewood <ngatewood@gmail.com>, Linda Batts <samuel1008@verizon.net>, Mary Hyghes <mhughes90@aol.com>, bettyblandthomas@comcast.net, Neighbors for Single Family Zoning <jodylanders3@gmail.com>, "thecarecommunityassociation@yahoo.com" <thecarecommunityassociation@yahoo.com>, renay royster <royster410@yahoo.com>, Cynthia Gross <gross1901@gmail.com>, "Tanisha N. Jones" <tanisha.n.jones@gmail.com>, "soniaeddy@gmail.com" <soniaeddy@gmail.com>, Coldstream Homestead Montebello <chmc.corp@gmail.com>, janetallen2011 <janetallen2011@comcast.net>, tonwellz@aol.com, Alexius Wilson <alexius.bwilson@gmail.com>, Lawrence Bell <lawrencebell@me.com>, Peggy Rice <p_rice33@yahoo.com>, "James (Jimmy) and Connie Riley" <conril8@yahoo.com>, Keondra Prier <president@reservoirhillassociation.org>, knbeagle@gmail.com, doneill1952@comcast.net, biffordt@gmail.com, dnyweide@yahoo.com, Carolyn Carey <caclion70@gmail.com>, chazwilliamz@gmail.com, ritacrews@verizon.net, info.ica21239@gmail.com, whnathansr@yahoo.com, FredaFanning@gmail.com, LaTayia Wright <lwright@go-northwesthrc.org>

Subject: Re: City Council Bill 25-0066_ Letter

Who was online and was denied the opportunity to speak?

From: kelli bigelow <kbigelow2011@gmail.com>

Sent: Monday, December 1, 2025 8:40 AM

To: Mereida Goodman <mgoodman@go-northwesthrc.org>

Cc: Dorsey, Ryan (City Council) <rd@baltimorecity.gov>; sharon.middleton@baltimorecity.gov <sharon.middleton@baltimorecity.gov>; paris gray <paris.gray@baltimorecity.gov>; Porter, Phylcia R.L. (City Council) <phylcia.porter@baltimorecity.gov>; Bullock, John (City Council) <john.bullock@baltimorecity.gov>; Blanchard, Zachary (City Council) <zachary.blanchard@baltimorecity.gov>; Mark Parker <mark.parker@baltimorecity.gov>; Testimony <testimony@baltimorecity.gov>; Cohen, Zeke (City Council) <zeke.cohen@baltimorecity.gov>; mayor@baltimorecity.gov <mayor@baltimorecity.gov>; Schnella, Ty'lor (Mayor's Office) <tylor.schnella@baltimorecity.gov>; Joan Floyd <joanfloyd@hotmail.com>; Laurence Campbell <lfcrick123@yahoo.com>; JOYCE SMITH <smithjrp@aol.com>; Karen Braden <kbraden410@gmail.com>; Arlington West <westarlington@gmail.com>; Arlisa Anderson <arlisa.anderson@gmail.com>; Darryn Mobley <darryn.mobley@yahoo.com>; Catherine Pugh <cepughco@gmail.com>; Sharon Bradford <forestpkassociation@gmail.com>; George Collins <ETC207@yahoo.com>; Jennifer V. Huggins

<hugs4j@gmail.com>; Nichole' Gatewood <ngatewood@gmail.com>; Linda Batts <samuel1008@verizon.net>; Mary Hyghes <mhughes90@aol.com>; bettyblandthomas@comcast.net <bettyblandthomas@comcast.net>; Neighbors for Single Family Zoning <jodylanders3@gmail.com>; thecarecommunityassociation@yahoo.com <thecarecommunityassociation@yahoo.com>; renay royster <royster410@yahoo.com>; Cynthia Gross <gross1901@gmail.com>; Tanisha N. Jones <tanisha.n.jones@gmail.com>; soniaeddy@gmail.com <soniaeddy@gmail.com>; Coldstream Homestead Montebello <chmc.corp@gmail.com>; janetallen2011 <janetallen2011@comcast.net>; tonwellz@aol.com <tonwellz@aol.com>; Alexius Wilson <alexius.bwilson@gmail.com>; Lawrence Bell <lawrencebell@me.com>; Peggy Rice <p_rice33@yahoo.com>; James (Jimmy) and Connie Riley <conril8@yahoo.com>; Keondra Prier <president@reservoirhillassociation.org>; knbeagle@gmail.com <knbeagle@gmail.com>; doneill1952@comcast.net <doneill1952@comcast.net>; biffordt@gmail.com <biffordt@gmail.com>; dnyweide@yahoo.com <dnyweide@yahoo.com>; Carolyn Carey <caclion70@gmail.com>; chazwilliamz@gmail.com <chazwilliamz@gmail.com>; ritacrews@verizon.net <ritacrews@verizon.net>; info.ica21239@gmail.com <info.ica21239@gmail.com>; whnathansr@yahoo.com <whnathansr@yahoo.com>; FredaFanning@gmail.com <FredaFanning@gmail.com>; LaTayia Wright <lwright@go-northwesthrc.org>

Subject: Re: City Council Bill 25-0066_ Letter

Good Morning Members of the Land Use and Transportation Committee

I am Kelli Bigelow , VP of Liberty Square Community Association, Homeowner, and an at home Business owner. I am vehemently opposed to this inequitable bill that disenfranchises Baltimores Black Majority and neighborhoods. My formal testimonial is attached, and I am asking that my testimony be accepted and formally entered into the record.

Leva, Anthony F (City Council)

From: Charles Williams <chazwilliamz@gmail.com>
Sent: Thursday, December 11, 2025 7:09 PM
To: Cohen, Zeke (City Council); Middleton, Sharon (City Council); Torrence, James (City Council); Porter, Phylcia R.L. (City Council); Schleifer, Isaac (City Council); Conway, Mark (City Council); Gray, Paris (City Council); Bullock, John (City Council); Glover, Antonio (City Council); Ramos, Odette (City Council); McCray, Danielle (City Council); Parker, Mark (City Council); Blanchard, Zachary (City Council); rdorsey; Jones, Jermaine (City Council); antonio.hayes@senate.state.md.us; Cortese, Christina (City Council); Savarese, Brandy (City Council); Maureen Regan -GOV-; Brandon M Scott; Testimony; Marlon Delegate; Marlon.Amprey@hose.state.md.us; Frank.Conaway@house.state.md.us; phillip.branch@baltimorecity.gov; Melissa.Wells@house.state.md.us; mail@stattorney.org; jbentley@stattorney.org; Emily Witty; Sean Stinnett; spotlightmaryland@sbgvtv.com; Kennedy, Alice (DHCD); Samuel Rosenberg; Mary Hyghes
Cc: Malcolm Lewis; William Blackwell; Brenda Allison; Joel Kurz; Jules Dunham Howie; Eric Brown; Atiba Nkrumah; Fred Tillman
Subject: Service Failures Supporting a Moratorium on 25-0066
Attachments: IMG_8669.png; IMG_8674.png; DD0F6661-3D39-4AD6-BBB1-EAD1CF609D44.png; IMG_8671.MOV

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Good evening Council Members and Members of the Maryland Delegation,

I write to provide a clear, real-world illustration of why residents across Baltimore are urgently requesting that the City conduct comprehensive studies—operational, infrastructural, fiscal, and equity-based—before advancing Bill 25-0066. Sometimes seeing is believing, and the attached images offer a concrete example of the very service failures that will be magnified if large-scale density changes are adopted without proper planning.

On my block, a plainly posted “No Parking Thursday 12 p.m.–2 p.m.” street-cleaning sign is ignored every single week. As a result, the sweeper is unable to access the curb, the roadway remains uncleaned, and the responsibility falls on residents—many of whom are already stretched thin. This is not anecdotal or occasional; it is a weekly pattern that has been documented repeatedly.

Below is a partial list of service request numbers filed since September regarding this exact issue:

25-00832497; 25-00834431; 25-00851114; 25-00876598; 25-00907826;

25-00789220; 25-00973346; 25-01022598; 25-01041579; 25-01031735.

Despite these repeated filings, enforcement has not improved, and conditions remain unchanged.

This example demonstrates a broader systemic concern: the City is currently unable to reliably deliver or enforce basic municipal services, even when requirements are clear, signage is posted, and the problem is predictable. This block-level example reveals a deeper reality: if the City cannot manage routine enforcement today, it would be reckless to add density without first conducting the comprehensive, transparent impact studies that responsible planning requires. The service gap is not isolated to one neighborhood; it disproportionately impacts historically marginalized and under-resourced communities citywide—communities that Bill 25-0066 would further burden by increasing density without corresponding investment or capacity-building.

For those of us who live this reality week after week, these are not abstract policy debates. They directly erode our quality of life—our sense of safety, cleanliness, stability, and trust in government—and they signal what will happen on a much larger scale if additional density is layered onto already overextended systems.

In the absence of comprehensive, transparent impact studies, the Council risks advancing a policy that amplifies existing inequities. Had the proper analyses been completed—consistent with best planning practices—it would be evident that Baltimore’s infrastructure, sanitation systems, parking enforcement capacity, and inspection resources are already overextended. Adding density without reinforcing these systems would not simply be challenging; it would produce measurable harm to the very residents the bill claims to help and further diminish quality of life in communities that have already borne more than their share of neglect.

This is why meaningful impact assessments are not optional—they are essential. Residents are not resisting change; we are asking for responsible governance grounded in data, capacity evaluation, and equity analysis.

Baltimore cannot afford to legislate based on aspiration while the lived experience of communities reflects deterioration, neglect, and administrative strain. This weekly, well-documented failure is a micro-level example of a macro-level truth: the City is not yet positioned to manage additional density without first restoring core services.

Accordingly, we respectfully request that a moratorium be put in place on Bill 25-0066 due to the lack of comprehensive, transparent impact studies. Only after those studies are completed, publicly shared, and meaningfully incorporated into the policymaking process should any further action on this bill be considered—so that policy is shaped by evidence, not assumptions, and so that the quality of life of existing residents is protected rather than sacrificed.

Thank you for your attention to this matter and for your commitment to equitable and effective public policy.

Respectfully,

Charles Williams

Marble Hill Community Advocate



Council Bill 25-0066 — Housing Options and Opportunities Act

January 7, 2026

POSITION: Do Not Support

Council Bill 25-0066, part of Mayor Brandon Scott’s housing strategy, would allow 2–4 units in a single structure larger than 1,500 square feet. The theory is that converting a 3,000 sq. ft. home into multiple smaller units lowers per-unit costs and increases affordability and access.

Baltimore clearly needs more affordable housing. Today, **57% of renters pay more than 30% of their income toward housing, and 33% pay more than half**. On its face, increasing density appears to be a solution.

However, while this bill removes racist single-family zoning policies on paper (*de jure*), it does **not address the lived realities in neighborhoods long targeted by slumlords, speculators, and predatory flippers (de facto)**. Cost savings from development are rarely passed on to renters or buyers. Historically, Black families in neighborhoods like Edmondson Village were steered into homes that had been bought cheaply and resold at inflated prices. Today, homes acquired through tax sale or “We Buy Houses” schemes are often flipped with unpermitted or poor-quality work and listed far above prior values.

The same dynamic affects renters. Many landlords routinely appeal tax assessments, claiming low market values, even though assessments should be based on rental income. When landlords win assessment reductions, **there is no evidence rents go down**. Without affordability requirements, density alone will not reduce displacement or stabilize communities.

If the goal is affordability, accessibility, and neighborhood stability, those outcomes must be **built into the bill**. I urge Council to strengthen the Act with the following measures:

1. **Allow two-unit conversions with minimal lot size and square-footage restrictions**
To support intergenerational living, “granny flats” or family units should receive targeted **tax exemption**.
2. **Tie additional units to affordability:**
 - 3rd unit: reserved for households at **60–80% AMI**
 - 4th unit: reserved for households at **≤60% AMI**
Rents should be capped at **30% of AMI** to support mixed-income neighborhoods.

3. **Require tenant notification of the Maryland Renters' Tax Credit** for all new leases after conversion from single-unit to multi-unit housing.
4. **Launch the Charm City Roots program for housing reclamation**, supporting legacy families and heirs' property owners with rehab grants, zero-interest loans, and tax credits so they can convert large family homes themselves.
(The SOS Fund has already submitted a pilot proposal to the Department of Housing.)
5. **Reform DCHD permitting and inspections** to ensure timely, rigorous, and transparent oversight. Opposition to conversions is often rooted in valid concerns about unsafe and poorly inspected construction, particularly in Black neighborhoods.
6. **Protect low-income buyers from post-sale reassessments.**
Converted properties purchased by households at or below **80% AMI** should receive **automatic Homestead protections**, capping annual assessment growth at 4%.

Ending single-family zoning is necessary, but it is not sufficient. What replaces it must be **reparative**, not extractive. Without strong affordability, tax, and anti-displacement protections, this bill risks accelerating gentrification rather than stabilizing the very neighborhoods harmed by past housing policy.

Density without justice is not housing equity. Baltimore deserves better.

For the above reasons,
The SOS Fund urges the city council not to move this bill forward as written.

Testimony
In Opposition of Rezoning Proposal
25-0066

Dear City Council members,

I am a resident of the Baltimore City neighborhood of Cedarcroft. The houses here are historic and the neighborhood owes much of its charm to its single family homes designed in similar styles in the 1920s and owned by one owner. This is what attracted most of the residents in Cedarcroft to the neighborhood. This is why our residents pay what we paid for our homes and pay the property tax amounts we pay to the city.

The proposal to allow for indiscriminate multi-family housing, including carving up existing residences into up to four separate dwellings will diminish, possibly destroy the character of our neighborhood. This will have significant implications to the livability of the neighborhood and its property values. I live close to the one property in the neighborhood that is multi-family and it is a constant source of problems. The house is rented by college students who take up an inordinate amount of street parking, park on the yard of the property and take poor care of the property.

Residents here are dedicated to preserving this historic neighborhood and to improving Baltimore City. I understand there is a dearth of affordable homes for residents of the city. There are other solutions that are not as indiscriminate and have far lower downsides than broadly allowing historic neighborhood homes to be carved up and sold.

I opposed proposal 25-0066 because I stand for maintaining Baltimore's historic neighborhoods, not cutting them up in a manner that benefits only the real estate developers and house flippers to the detriment of the neighborhood. I urge you to oppose this proposed bill as well, or at least to oppose the portion of that allows for these treasures to be sub-divided.

Sincerely,

John Abell

Resident of Baltimore since 1972

Testimony
In Opposition of Rezoning Proposal
25-0066

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John Abell

Resident of Baltimore since 1972

October 16, 2025

Dear Baltimore City Council:

I am writing to express my concerns about 20250064 and 20250065. I do not fully oppose these bills but in my professional opinion, as an affordable housing and community development advocate, these bills are just simply not radical enough to attract new population, build housing, make housing affordable again, and retain long-term legacy. In fact, based upon my professional and personal experience, I think these bills, coupled with the other bills in the housing package and the Harford Road Overlay District bill, are the antithesis of what I hope you are attempting to accomplish. Unless, the speculation is accurate and some on City Council are in the hands of developers or just simply naïve. I give some solutions at the end of this letter, see page 5.

So here are my thoughts:

City Council Bill 25-0064 Zoning – Bulk and Yard Requirements Amendments: Introduced by Councilmember Gray; Cosponsored by: President Cohen, and Councilmembers Dorsey, Middleton, Torrence, Blanchard, Bullock, and Porter.

- The bill Increases the lot coverage and reduces yard requirements in all residential zoning districts.
- The changes will reduce the amount of open and green space in all zones by increasing the maximum percentage of lot coverage allowed by 28-40 percent, depending on the existing zoning district, and by reducing the required interior side and corner yard footage in all zones.
 - There is a disproportionate impact upon some already existing high dense neighborhoods, particularly our neighbors in R-6 and R-7, along with R-1A through R-1E.¹
- Bigger buildings and less yard space will increase the heat island effects experienced in many neighborhoods. Councilmember Dorsey wanted District 3 to reduce its carbon footprint. Without environmental reviews and better ground water infrastructure, it will negatively impact neighborhoods with high water tables.²
- In R-1 districts the required side yard is reduced from 20 to 15 feet, which is a 25% reduction in space and in R-3 zones from 10 feet to 5 feet, which is a 50% reduction in yard space.
- In R-8 zones the rear yard can be completely eliminated under certain conditions.
- Reduces the required lot size required for multi-family dwellings in R-5 through R-8 zones.
- Allows for increased density without taking into account the impact on public utilities and services.

¹ Council Bill 25-0064 (first reader)

² *Wall Street Journal*, Charleston Floods Are Getting Worse. For These Residents, It's Worth the Risk, September 11, 2025

- Less open and green space will negatively impact air quality and public health. Nationwide this disproportionately impacts lower income and predominantly Black neighborhoods.³
- Will negatively impact the visual and aesthetic appeal of the and sense of privacy within the neighborhood.
- Bill 0064 uses a mechanism called “FAR”, which is floor area ratio - to calculate building height. FAR is not defined in the bill.

City Council Bill [25-0065](#) Zoning – Eliminating Off-Street Parking Requirements:

Introduced by Councilmember Blanchard; Cosponsored by: President Cohen, and Councilmembers Dorsey, and Gray.

- Eliminates a required minimum number of off-street parking spaces for all uses and instead sets a maximum number of spaces allowed. The current code requires at least one parking space per dwelling unit.
- Will greatly increase the competition for on-street parking
- Will place added burden on existing residents and add to parking and street congestion.
- Will relieve developers of the cost of providing adequate off-street parking, while placing added burdens on neighboring residents.
- The law does not take into account the vehicular density or congestion that already exists in a neighborhood.
- There is no proof that the cost savings of not providing off-street parking will be passed along to the renters/residents! Developers, management agents, and real estate software such as RealPage will set rents and sale prices based upon what the market can command unless these parties are non-profits and/or incentivized by City mandates and covenants to make housing more affordable.
- While we recognize that Baltimore City’s population decline is leading us back to population levels not seen since 1900-1910, our public transit and school busing services and walkability must be improved before increasing density back to 1950 levels.⁴
- Together, 0064, 0065, and 0066, will negatively impact pre-existing high-density neighborhoods for many in such neighborhoods.
- Parking can be a quality-of-life issue, as memorialized by the members of the city’s Residential Permit Parking Advisory Board (RPPAB) in regards to City Council Bill 22-0285, the Abundant Housing Act.
- Parking lots can play an important role in harnessing and protecting nature through infrastructure such as native plants, swales, berms, retention ponds, and daylit streams. Especially, as the City will allow neighborhoods to become denser with larger buildings,

³ “Weathered: Earth’s Extremes” Episode 3: “The Heat is On”

⁴ U.S. Census Bureau and Federal Reserve Bank of St. Louis

taller buildings, and less private green space. The West Baltimore MARC station is a prime example of such efforts to harness and protect nature in the parking lot environment.

- Parking Authority of Baltimore City (PABC) is in support of 0065 and notes in its testimony that the bill implements “incremental” change. PABC’s executive director cites that in 2022 PABC undertook a limited survey of affordable housing developments built in the past decade and noted that parking minimums were overbuilt by at least half. It would have been preferable for PABC to provide additional details, such as number of developments surveyed, location, and walking scores. In addition, PABC notes that they surveyed affordable housing developments, where residents may be less likely to have cars. In addition, there is no guarantee that 0062-0066 will create affordable housing developments. PABC spends much of its written testimony discussing off street parking/parking minimums changes in the city’s various commercial districts. Lastly, PABC states: “All of these point the city toward a future that is greener, cleaner and more sustainable by reducing or eliminating parking minimums.” This statement ignores that 0062-0066 is a housing package and can work in tandem with each other. 0064 allows for additional building coverage per lot and taller buildings in all residential communities, thereby reducing private greenspace. In addition, these bills do nothing to incentive homegrown residential and commercial development in our neighborhoods that have experienced sustained high vacancy rates and divestment.
- This bill, along with its predecessor, the Abundant Housing Act, failed to acknowledge that in the past 10 years that there were at least two gun violence parking disputes in District 3. At least one such dispute resulted in a homicide.
- While we can concede that parking minimums can be adjusted, we do not believe that there is a one-size-fits-all solution that will increase housing, affordable housing, and community attractiveness for all 300+ of the city’s neighborhoods.

Some additional thoughts on 0064 and 0065:

- Council has not disclosed their sources of information that informed them to create such bills. This lack of transparency is troubling.
- These bills do nothing to grow commercial districts other than the hope population growth will sustain and possibly grow business corridors. There is no incentive provided to grow commercial corridors. Food deserts may remain food deserts.
- There is no research provided that these bills will reduce housing costs. The bills more than likely will effectuate a growth of multifamily rentals rather than homeownership market. There are no incentives or subsidies provided to make housing costs truly affordable, based income. There is no research provided that developers or landlords will pass down construction costs savings to residents rather than charging what the market will command.
- If these bills effectuate multifamily housing growth, which is necessary, some communities may see their homeownership rates decline. Per the Baltimore Banner,

Black homeownership rates are plummeting and Black residents are making informed decisions to relocate. The Baltimore Brew recently noted that those protesting 0064 and 0065 before the Land Use and Transportation committee are not your stereotypical NIMBYs but rather largely Black women homeowners from predominantly Black communities.

- In addition, Baltimore's income growth has stagnated. In 2000 our median household income was just over \$51,000, adjusted for inflation. 20 years later our median household income is a little bit more than \$58,000. This is per the 2025 Maryland Housing Needs Assessment Update published by Maryland's Department of Housing and Community Development. The Baltimore Regional Housing Partnership provided this study in support of these bills. If incomes are not growing and 0062-0066 have no mechanism to make housing truly affordable then who stands to benefit from these bills?
- During a recent Planning Commission meeting, some members of Council and the Planning Commission laughed at the importance of the environmental benefits of trees and mocked neighbors concerned about this importance.
- The Planning office compared this initiative to efforts in "comparable" cities like Denver, Seattle, and Virginia Beach. We fail to see the commonalities of Baltimore City to these cities.
- The Planning Commission appears to lack impartiality when it comes to its efforts to assess and effectively challenge these bills, as a city commission is largely chartered to do.
- Bay text credits for increasing pervious surfaces exist. Baltimore city residents pay to remediate Bay pollution, and some residents have recently experienced a 50% increase to their water and sewage bills. We fail to see how these bills will promote the efforts to clean the Bay. And without proper sewage infrastructure, but increased population and density, our efforts and money may literally continue to go down the drain.
- There are no incentives or covenants to mandate housing affordability. And these bills do not preserve existing rental or homeownership stock
- When we talk about neighborhood character, most of us are not dog whistling. We simply want to see our neighborhoods retain their attractiveness and continue to add new residents. While we acknowledge more can be done to rebuild our population, which is important, add viable housing, and truly increase housing affordability, we do not want to sacrifice existing community benefits to accomplish these goals. For instance, several neighborhoods in district 3 are considered historic by either the City, State, and Department of Interior.
- Per a Baltimore Banner May 2025 article, the Mayor promised to engage the community this time regarding 0062-0066. So far, the City has not fulfilled this promise. The Planning Commission has held one listening session during the workday. Otherwise, all community engagement has come in the form of workday hearings on the bills or community associations reaching out to public officials.
- Has the City fixed the permit system yet?

- Because modifying the housing market with disregard to down river impacts more than likely negatively impacts housing affordability for existing and potential new residents, we request:
 - A slow down on vetting and voting these bills until there is true community engagement as the Mayor promised
 - Disclosure of organizations that have lobbied the City to make these changes
 - Disclosure of periodicals, research, organizations, academics, and other sources of information that have informed the City on their decision making, as the City makes a habit of claiming facts without citations
 - Disclosure of any Maryland, Federal, or another jurisdiction's regulations/ordinances/laws that have influenced the City to make these decisions
 - An analysis of community needs to truly attract population growth and make housing affordable: public transit, walkability to amenities, and income growth to start and how the City is addressing these quality of life needs
 - An analysis of existing mechanisms to truly make housing affordable such as HUD's project-based subsidy porting rules, regulations, and appropriations, implementation of income restricted covenants, incentivizing the building, operation, and preservation of various housing types for low to moderate income households
 - An independent analysis on high vacancy neighborhoods (over 7% to 10% vacancy rate) of current programs and funding sources and needed programs and funding sources to put these communities back into full viability and habitability
 - A study with implementation goals to decrease the outflow of Black households
 - A study with implementation goals to ward off gentrification
 - A study to examine current economic factors (job losses, paltry job gains, inflation, income stagnation, loss of federal and federal dependent jobs, and disproportionate impact of the loss of income in Black households since the administration change, and cost of living increases) in relation to how these bills can make housing affordable for current and future Baltimore City residents
 - City incentives to help develop the needed number of rental and homeownership units that are currently and forecasted to be be backlogged over the next 40 years

Respectfully,

Tanisha N. Jones | Super Voter | District 3