



**BALTIMORE CITY COUNCIL  
ECONOMIC AND COMMUNITY DEVELOPMENT  
COMMITTEE**

*Mission Statement*

*On behalf of the Citizens of Baltimore City*, the Committee on Economic and Community Development (ECD) is responsible for supporting strong thriving communities. ECD will review proposed zoning and land use changes, tackle issues related to economic development, oversee housing policy, and promote equitable economic opportunity for all Baltimore residents.

**The Honorable Sharon Green Middleton**

**PUBLIC HEARING**

**February 13, 2024**

**2:00 PM**

**CLARENCE "DU" BURNS COUNCIL CHAMBERS**

**23-0448**

**Urban Renewal - Inner Harbor Project I - Amendment 21**



**BILL SYNOPSIS**

**Committee: Economic and Community Development**

**Bill: 23-0448**

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**Urban Renewal - Inner Harbor Project I - Amendment 21**

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**Sponsor:** Councilmember Costello

**Introduced:** October 30, 2024

**Purpose:**

For the purpose of amending the Urban Renewal Plan for Inner Harbor Project I; amending the Development Area Controls for certain development areas; amending the Land Use and Proposed Zoning exhibits to the Plan; waiving certain content and procedural requirements, making the provisions of this Ordinance severable; providing the application of this Ordinance in conjunction with certain other ordinances; and providing for a special effective date.

BY authority of

Article 13 – Housing and Urban Renewal  
Section 2-6  
Baltimore City Code  
(Edition 2000)

**Effective:** On the date it is enacted

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**Agency Reports**

|                                   |                                   |
|-----------------------------------|-----------------------------------|
| City Solicitor                    | Approved for Form and Sufficiency |
| Office of Sustainability          |                                   |
| Baltimore Development Corporation | Support                           |
| Dept Recreation and Parks         | Support                           |
| BMZA                              | No report or comment              |

|                                      |                        |
|--------------------------------------|------------------------|
| Parking Authority                    | Support                |
| Dept of Transportation               | No Objection           |
| Planning Commission                  | Approve with Amendment |
| Dept Housing & Community Development | Support                |
| Dept Public Works                    | Support                |
| CHAP                                 |                        |

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## Analysis

### Background

The Inner Harbor Project I Urban Renewal Plan was originally enacted in 1967. It is currently set to expire in 2040. This amendment if adopted would be the 21<sup>st</sup> time in that 57-year period that the bill has been amended. Note that the Agency or Department referenced in the bill refers to the Department of Housing and Community Development – previously called the Baltimore Urban Renewal and Housing Agency.

### Bill Summary

This amendment if adopted would update the URP’s Development Area Controls and the Land Use and Proposed Zoning Exhibits. Updates would include:

1. The ability to update the lot lines of development areas and to subdivide or combine portions of development areas.
2. Allow outside display of merchandise in development areas 13 & 15a.
3. Remove the 50’ maximum height limitation making the limit subject to the zoning of the parcel in development areas 13 & 15a.
4. Adds the Urban Design and Architecture Advisory Panel to the design review process for areas 13 & 15a.
5. Adds Residential as a use to development areas 13, & 15a.
6. Add Commercial use to development area 14.
7. Permits building construction in area 14 that is allowed by the agency providing:
  - a. It does not exceed 3 stories
  - b. 20,000 gross sq feet aggregate across area 14
  - c. Prohibits vehicular circulation and parking at or above grade
8. In area 15a the agency will be able to expressly permit parking provided it is screened from the public and not at grade level.

In its report, the Parking Authority encourages the developer/owner of any parking created as a result of this legislation to consider shared parking arrangements. A recent survey found 9,000 off-street spaces available on the weekends and evenings in the Inner Harbor. Shared parking

could help focus on the walkability of the site and minimize congestion. The Parking Authority also notes the possible fiscal impact on its programs via increased use of metered parking and PABC-managed off-street parking facilities.

### **Amendments**

The Planning Department is proposing several amendments to the bill including:

1. Remove parking requirement of 3,000 – 4,500 and instead utilize underlying zoning.
2. Strike the content of Section I. Minimum Elevation for Development and replace with reference to Floodplain and Critical Area requirements as per Article 7 - Natural Resources, etc.
3. For Development Area 14 remove proposed language limiting height and gross square footage.
4. Modify Appendix 1 – Waterfront Area Controls to include Lot 15.
5. Modify Exhibit F to include the pedestrian promenade along the entire harbor and public access corridors identified by the development team – as proposed by the applicant.

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### **Additional Information**

**Fiscal Note:** Not Available

**Information Source(s):** Baltimore City Code, Reporting Agencies, Bill 23-0448.

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Analysis by: Anthony Leva Direct Inquiries to: 410-396-1091

Analysis Date: February 1, 2024

**CITY OF BALTIMORE  
COUNCIL BILL 23-0448  
(First Reader)**

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Introduced by: Councilmember Costello and President Mosby

At the request of: MCB HP Baltimore, LLC

Address: c/o Caroline Hecker, Esq.

Rosenberg Martin Greenberg, LLP

25 South Charles St., Suite 21<sup>st</sup> Fl, Baltimore, Maryland 21201

Telephone: (410) 727-6600

Introduced and read first time: October 30, 2023

Assigned to: Economic and Community Development Committee

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REFERRED TO THE FOLLOWING AGENCIES: City Solicitor, Parking Authority for Baltimore City, Department of Housing and Community Development, Planning Commission, Department of Public Works, Commission for Historical and Architectural Preservation, Board of Municipal and Zoning Appeals, Baltimore Development Corporation, Department of Transportation, Department of Recreation and Parks, Office of Sustainability

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A BILL ENTITLED

1 AN ORDINANCE concerning

2 **Urban Renewal – Inner Harbor Project I – Amendment 21**

3 FOR the purpose of amending the Urban Renewal Plan for Inner Harbor Project I; amending the  
4 Development Area Controls for certain development areas; amending the Land Use and  
5 Proposed Zoning exhibits to the Plan; waiving certain content and procedural requirements,  
6 making the provisions of this Ordinance severable; providing the application of this  
7 Ordinance in conjunction with certain other ordinances; and providing for a special effective  
8 date.

9 BY authority of

10 Article 13 – Housing and Urban Renewal

11 Section 2-6

12 Baltimore City Code

13 (Edition 2000)

14 **Recitals**

15 The Urban Renewal Plan for Inner Harbor Project 1 was originally approved by the Mayor  
16 and City Council of Baltimore by Ordinance No. 67-1045, as last amended by Ordinance 15-327.

17 An amendment to the Urban Renewal Plan for Inner Harbor Project I is necessary to update  
18 the Development Area Controls for certain development areas and to amend the Land Use and  
19 Proposed Zoning Exhibits to reflect changes to the Plan.

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

**Council Bill 23-0448**

1 Under Article 13, § 2-6 of the Baltimore City Code, no substantial change may be made in  
2 any approved renewal plan unless the change is approved in the same manner as that required for  
3 the approval of the renewal plan.

4 **SECTION 1. BE IT ORDAINED BY THE MAYOR AND CITY COUNCIL OF BALTIMORE,** That the  
5 following changes in the Urban Renewal Plan for Inner Harbor Project I are approved:

6 (1) In the Plan, amend Section III.B to read as follows:

7 III. Land Disposition

8 B. The Areas shown as available for disposition in Exhibits B, “Development  
9 Areas”, and C, “Land Use”, are schematic and approximate, and the Agency  
10 shall have the right, in its discretion, to fix their precise boundaries and size.  
11 The Agency shall also have the right, [in order] to facilitate the most  
12 advantageous development of the Project, to subdivide or combine the  
13 Development Areas OR PORTIONS THEREOF, INCLUDING ADJUSTING THE  
14 ESTABLISHED PARCEL AND LOT LINES OF DEVELOPMENT AREAS UNDER AGENCY  
15 CONTROL, and in so doing to assign or consolidate, as the case may be, the  
16 Standards and Controls applicable to said Development Areas. To carry out  
17 this Plan, the Agency will formulate appropriate disposition policies and  
18 procedures.

19 (2) In the Plan, amend Section V.B. to read as follows:

20 V. Standards and Controls

21 B. Size of Facilities:

22 The minimum and maximum sizes of the various types of facilities in each  
23 Development Area shall be determined by [the Agency, provided that the  
24 facilities defined in section IV.3 as Office, Housing, Transient Housing, and  
25 Retail, in that portion of the Project to be disposed of, shall contain in the  
26 aggregate not less than 2,000,000 square feet of gross building area nor more  
27 than 4,000,000 square feet of gross building area, and provided further, that  
28 the] THE ZONING FOR EACH PARCEL. THE facilities defined in Section IV.3 as  
29 Parking, in that portion of the Project to be disposed of, shall contain in the  
30 aggregate not less than 3,000 spaces nor more than 4,500 spaces. [The Agency  
31 shall set maximum densities of residential development which shall not  
32 exceed 250 dwelling units per net acre.]

33 (3) In the Plan, amend Section V.D. to read as follows:

34 V. Standards and Controls

**Council Bill 23-0448**

D. Servicing:

All servicing shall be off street, and except with respect to Development Areas 13 and 15a and to the properties not to be acquired, shall be within structures and roofed, so as to be screened from public view. Loading docks will be provided and in accordance with the Building Code of Baltimore City. Open-air storage of equipment, merchandise, and materials is prohibited, except in Development Areas 17a and 25. Outside exhibit or display of merchandise is prohibited, EXCEPT IN DEVELOPMENT AREAS 13 AND 15A, AND except where specifically permitted by the Department.

(4) In the Plan, amend V. P. Development Area 13 to read as follows:

V. Standards and Controls

P. Development Area Controls:

Development Area 13

a. General Use: Commercial AND RESIDENTIAL

b. Building Requirements:

i. Maximum Permitted Height: [Elevation 50 feet, except for limited extensions of specialized construction as may be approved by the Agency] SUBJECT TO THE ZONING OF THE UNDERLYING PARCEL.

ii. Vehicular Access: Access will be permitted from the surrounding streets through Development Area 15, in such a manner as may be approved by the Department.

iii. Parking: No Parking permitted except for special uses as may be approved by the Department.

iv. Planning Review: All preliminary and final plans for Development Area 13 shall be subject to review and comment by [an ad hoc Advisory Task Force (hereinafter called Task Force) which shall be established by the Commissioner of the Department of Housing and Community Development to provide citizen input into the design process for the improvements to be constructed within said Development Area. The size and composition of the said Task force shall be determined by the Commissioner at his sole discretion except that the Task force shall include two representatives of the City Council who shall be appointed by the President. The Department shall retain final authority to approve or disapprove all proposed plans for said area.] THE URBAN DESIGN AND ARCHITECTURE ADVISORY PANEL (UDAAP), AS PART OF THE DESIGN REVIEW PROCESS ESTABLISHED BY TITLE 4, SUBTITLE 4 {"DESIGN REVIEW"} OF THE ZONING CODE.

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1 (5) In the Plan, amend V. P. Development Area 14 as follows:

2 V. Standards and Controls

3 P. Development Area Controls:

4 Development Area 14

- 5 a. General Use: Public AND COMMERCIAL
- 6 b. Building Requirements: [No building construction will be permitted at or  
7 above grade level except for that which is related and incidental to the  
8 General Use of this Development Area, and which is approved by the  
9 Agency, provided that vehicular circulation and parking at or above grade  
10 are prohibited.]

11 BUILDING CONSTRUCTION, WHICH IS APPROVED BY THE AGENCY, SHALL BE  
12 PERMITTED, PROVIDED THAT THE BUILDING CONSTRUCTION:

- 13 1. DOES NOT EXCEED 3 STORIES; OR
- 14 2. A TOTAL OF 20,000 GROSS SQUARE FEET IN THE AGGREGATE  
15 ACROSS DEVELOPMENT AREA 14; AND
- 16 3. THAT VEHICULAR CIRCULATION AND PARKING AT OR ABOVE GRADE  
17 ARE PROHIBITED.

18 (6) In the Plan, amend V. P. Development Area 15a to read as follows:

19 V. Standards and Controls

20 P. Development Area Controls:

21 Development Area 15a

- 22 a. General Use: Commercial AND RESIDENTIAL
- 23 b. Building Requirements:
- 24 i. Maximum Permitted Height: [Elevation 50 feet, except for limited  
25 extensions of specialized construction as may be approved by the  
26 Agency] SUBJECT TO THE ZONING OF THE UNDERLYING PARCEL.
- 27 ii. Vehicular Access: Access will be permitted from the surrounding  
28 streets through Development Area 15, in such a manner as may be  
29 approved by the Department.



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1                   iii. Parking: [No Parking permitted except for special uses as may be  
2                   approved by the Department.] OFF-STREET PARKING IS PERMITTED  
3                   WHERE EXPRESSLY APPROVED BY THE DEPARTMENT, PROVIDED THAT  
4                   THE OFF-STREET PARKING IS NOT LOCATED AT GRADE AND IS SCREENED  
5                   FROM PUBLIC VIEW.

6                   iv. Planning Review: All preliminary and final plans for Development  
7                   Area 13 shall be subject to review and comment by [an ad hoc  
8                   Advisory Task Force (hereinafter called Task Force) which shall be  
9                   established by the Commissioner of the Department of Housing and  
10                  Community Development to provide citizen input into the design  
11                  process for the improvements to be constructed within said  
12                  Development Area. The size and composition of the said Task force  
13                  shall be determined by the Commissioner at his sole discretion except  
14                  that the Task force shall include two representatives of the City  
15                  Council who shall be appointed by the President. The Department shall  
16                  retain final authority to approve or disapprove all proposed plans for  
17                  said area.] THE URBAN DESIGN AND ARCHITECTURE ADVISORY PANEL  
18                  (UDAAP), AS PART OF THE DESIGN REVIEW PROCESS ESTABLISHED BY  
19                  TITLE 4, SUBTITLE 4 {"DESIGN REVIEW"} OF THE ZONING CODE.

20                  (7) Revise Exhibit B, "Development Areas" to reflect the changes in the Plan.

21                  (8) Revise Exhibit C, "Land Use" to reflect the changes in the Plan.

22                  (9) Revise Exhibit D, "Proposed Zoning" to reflect the changes in the Plan.

23                  (10) Revise Exhibit E, "Right-of-Way Adjustments" to reflect the changes in the Plan.

24                  **SECTION 2. AND BE IT FURTHER ORDAINED**, That the Urban Renewal Plan for Inner Harbor  
25                  Project I, as amended by this Ordinance and identified as "Urban Renewal Plan, Inner Harbor  
26                  Project I, revised to include Amendment 21, dated October 30, 2023", including Exhibit A,  
27                  "Land Acquisition", dated August 25, 1970, as most recently revised on October 6, 2000;  
28                  Exhibit B, "Development Areas", dated April 24, 1979, as most recently revised on \_\_\_\_\_;  
29                  Exhibit C, "Land Use", dated April 24, 1979, as most recently revised on \_\_\_\_\_; Exhibit D,  
30                  "Proposed Zoning", dated April 24, 1979, as most recently revised on \_\_\_\_\_; Exhibit E,  
31                  "Right of Way Adjustments", dated April 24, 1979, as most recently revised on \_\_\_\_\_; and,  
32                  Exhibit F, "Waterfront Area Controls", dated October 6, 2000, is approved. The Department of  
33                  Planning shall file a copy of the amended Urban Renewal Plan with the Department of  
34                  Legislative Reference as a permanent public record, available for public inspection and  
35                  information.

36                  **SECTION 3. AND BE IT FURTHER ORDAINED**, That if the amended Urban Renewal Plan  
37                  approved by this Ordinance in any way fails to meet the statutory requirements for the content of  
38                  a renewal plan or for the procedures for the preparation, adoption, and approval of a renewal  
39                  plan, those requirements are waived and the amended Urban Renewal Plan approved by this  
40                  Ordinance is exempted from them.

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1       **SECTION 4. AND BE IT FURTHER ORDAINED,** That if any provision of this Ordinance or the  
2 application of this Ordinance to any person or circumstance is held invalid for any reason, the  
3 invalidity does not affect any other provision or any other application of this Ordinance, and for  
4 this purpose the provisions of this Ordinance are declared severable.

5       **SECTION 5. AND BE IT FURTHER ORDAINED,** That if a provision of this Ordinance concerns  
6 the same subject as a provision of any zoning, building, electrical, plumbing, health, fire, or  
7 safety law or regulation, the applicable provisions shall be construed to give effect to each.  
8 However, if the provisions are found to be in irreconcilable conflict, the one that establishes the  
9 higher standard for the protection of the public health and safety prevails. If a provision of this  
10 Ordinance is found to be in conflict with an existing provision of any other law or regulation that  
11 establishes a lower standard for the protection of the public health and safety, the provision of  
12 this Ordinance prevails and the other conflicting provision is repealed to the extent of the  
13 conflict.

14       **SECTION 6. AND BE IT FURTHER ORDAINED,** That this Ordinance takes effect on the date it is  
15 enacted.

**ECONOMIC AND COMMUNITY  
DEVELOPMENT COMMITTEE**

**23-0448  
AGENCY REPORTS**

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CITY OF BALTIMORE

BRANDON M. SCOTT  
Mayor



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

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January 22, 2024

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 23-0448 – Inner Harbor Project I – Amendment 21

Dear President and City Council Members:

The Law Department has reviewed City Council Bill 23-0448 for form and legal sufficiency. The bill would amend the Urban Renewal Plan for Inner Harbor Project I. Specifically, it would update the Development Area Controls for certain development areas and amend the Land Use and Proposed Zoning Exhibits to reflect changes to the Plan. Among other changes, it would: allow for specific development area boundaries to be modified to reflect changes to parcel lines; amend Section V.B. of the Plan to make the minimum and maximum facility sizes in each Development Area determined by the zoning for each parcel; add residential uses to Development Area 13, with maximum height subject to the underlying zoning and preliminary and final development plans subject to review by the Urban Design and Architectural Advisory Panel (“UDAAP”) pursuant to Title 4, Subtitle 4 of the Zoning Code; add commercial uses to Development Area 14, with accompanying building restrictions pertaining to stories, square feet, and vehicular circulation and parking; add residential uses to Development Area 15a, with maximum height subject to the underlying zoning, development plans subject to review by UDAAP, and off-street parking permitted with restrictions; and revise Exhibits B, C, D, and E, to reflect changes in the Plan.

Any changes in an Urban Renewal plan, such as these changes, must be made by ordinance. City Code, Art. 13, § 2-6(g)(1). Since this is not a technical amendment, it requires the same notice as that required to adopt the original ordinance that created the Plan. City Code, Art. 13, § 2-6(g)(2), (3). Thus, notice of the City Council hearing must be posted in the neighborhood of the area involved at least ten days prior to the hearing. City Code, Art. 13, § 2-6(d)(3)(i). Additionally, notice of the City Council hearing must be published once a week for two consecutive weeks in a newspaper of general circulation in Baltimore City. City Code, Art. 13, § 2-6(d)(3)(ii).

As for substance, the addition of residential uses and off-street parking to certain Development Areas may conflict with Section 9 of Article I of the Charter, which currently does not allow for residential uses or off-street parking within the Inner Harbor Park boundaries. However, the Law Department is aware that Bill 23-0444 is pending and, if passed by the Council and by City voters, would amend the Charter to permit such uses. If that does not happen, these use changes within the Plan would be ineffective.



Provided that the notice requirements outlined above are met, the Law Department may approve City Council Bill 23-0448 for form and legal sufficiency.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeffrey Hochstetler', with a long horizontal flourish extending to the right.

Jeffrey Hochstetler  
Chief Solicitor

cc: Ebony Thompson, Acting City Solicitor  
Nina Themelis, Mayor's Office of Government Relations  
Elena DiPietro, Chief Solicitor, General Counsel Division  
Hilary Ruley, Chief Solicitor  
Ashlea Brown, Chief Solicitor  
Michelle Toth, Assistant Solicitor  
Teresa Cummings, Assistant Solicitor

|      |                       |   |   |  |
|------|-----------------------|---|---|--|
| FROM | NAME & TITLE          | CHRIS RYER, DIRECTOR  | CITY of<br>BALTIMORE<br><br><b>MEMO</b> |  |
|      | AGENCY NAME & ADDRESS | DEPARTMENT OF PLANNING<br>8 <sup>TH</sup> FLOOR, 417 EAST FAYETTE STREET                              |   |  |
|      | SUBJECT               | CITY COUNCIL BILL #23-0448 / URBAN RENEWAL –<br>INNER HARBOR PROJECT I – AMENDMENT 21                 |   |  |

TO

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

DATE: January 3, 2024

At its regular meeting of December 21, 2023, the Planning Commission considered City Council Bill #23-0448, for the purpose of amending the Urban Renewal Plan for Inner Harbor Project I; amending the Development Area Controls for certain development areas; amending the Land Use and Proposed Zoning exhibits to the Plan; waiving certain content and procedural requirements, making the provisions of this Ordinance severable; providing the application of this Ordinance in conjunction with certain other ordinances; and providing for a special effective date.

In its consideration of this Bill, the Planning Commission reviewed the attached staff report, which recommended amendment and approval of City Council Bill #23-0448 and adopted the following resolutions, with nine members being present (nine in favor):

RESOLVED, That the Planning Commission predominantly concurs with the recommendation of its departmental staff and recommends that City Council Bill #23-0448 be **amended and approved** by the City Council, with the exception of amendment #4, which will be resolved at a later date.

If you have any questions, please contact Mr. Eric Tiso, Division Chief, Land Use and Urban Design Division at 410-396-8358.

CR/ewt

attachment

cc: Ms. Nina Themelis, Mayor's Office  
The Honorable Eric Costello, Council Rep. to Planning Commission  
Mr. Colin Tarbert, BDC  
Ms. Rebecca Witt, BMZA  
Mr. Geoffrey Veale, Zoning Administration  
Ms. Stephanie Murdock, DHCD  
Ms. Elena DiPietro, Law Dept.  
Mr. Francis Burnszynski, PABC  
Mr. Liam Davis, DOT  
Ms. Natawna Austin, Council Services



Brandon M. Scott  
Mayor

## PLANNING COMMISSION

Sean D. Davis, Chair; Eric Stephenson, Vice Chair

### STAFF REPORT



Chris Ryer  
Director

November 30, 2023

#### **REQUEST:**

##### City Council Bill #23-0444/ Charter Amendment – Inner Harbor Park (Eleventh District)

For the purpose of amending the provision dedicating for public park uses the portion of the City that lies along the north west and south shores of the Inner Harbor, south of Pratt Street to the water's edge, east of Light Street to the water's edge, and north of Key Highway to the water's edge, from the World Trade Center around the shoreline of the Inner Harbor and including Rash Field to permit multifamily residential development and off-street parking within the dedicated boundaries of Inner Harbor Park; and submitting this amendment to the qualified voters of the City for adoption or rejection. (Councilmember Costello & Council President)

##### City Council Bill #23-0446/ Zoning – C-5-IH Inner Harbor Subdistrict – Amendment (Eleventh District)

For the purpose of amending the description C-5-IH Inner Harbor Subdistrict; and amending the bulk and yard regulations for the Subdistrict.

##### City Council Bill #23-0448/ Urban Renewal – Inner Harbor Project I – Amendment 21 (Eleventh District)

For the purpose of amending the Urban Renewal Plan for Inner Harbor Project I; amending the Development Area Controls for certain development areas; amending the Land Use and Proposed Zoning exhibits to the Plan; waiving certain content and procedural requirements, making the provisions of this Ordinance severable; providing the application of this Ordinance in conjunction with certain other ordinances; and providing for a special effective date.

**RECOMMENDATION:** Approval with amendments

**STAFF:** Caitlin Audette

**INTRODUCED BY:** Councilmember Costello and Council President Mosby

**SITE/GENERAL AREA:** Downtown

#### **HISTORY**

##### City Council Bill #23-0444/ Charter Amendment – Inner Harbor Park

This was last amended in 2016 to allow for outdoor eating places in West Shore Park and Rash Field. City residents voted on this measure in November 2016, allowing this change.

##### City Council Bill #23-0446/ Zoning – C-5-IH Inner Harbor Subdistrict – Amendment

The 2016 update to the Zoning Code, TransForm Baltimore – which became active in 2017 – created C-5, the downtown zoning district. This category was intended to accommodate a wide range of uses, including maintaining and improving a pedestrian environment and allowing for new construction to be compatible with existing development. To achieve this goal the C-5 zoning district was divided into seven subdistricts one of which is the C-5-IH Inner Harbor Subdistrict, which is described in the Zoning Code as,

*§ 10-207 (c) Subdistricts.(3) C-5-IH Inner Harbor Subdistrict.*

*(i) The purpose of the C-5-IH Inner Harbor Subdistrict is to establish these standards for structures located adjacent to and facing the Inner Harbor.*

*(ii) The standards recognize that development within this subdistrict is to be oriented to the Inner Harbor waterfront and be predominantly pedestrian-oriented. Development is relatively low-scaled to accommodate the view of the harbor from adjoining subdistricts.*

This language has not been modified since it was adopted.

### **City Council Bill #23-0448/ Urban Renewal – Inner Harbor Project I – Amendment 21**

The Inner Harbor Project I Urban Renewal Plan (URP) was originally approved by the Mayor and City Council on June 15, 1967. Since that time, it has been amended 20 times with the most recent amendment dating to February of 2015. It will expire on December 29, 2040, forty years after Amendment #16.

### **ANALYSIS**

#### **City Council Bill #23-0444/ Charter Amendment – Inner Harbor Park**

##### Proposal

The bill seeks to modify Section 9 of the City Code which currently states the following,

*§ 9. Inner Harbor Park. There is hereby dedicated to public park uses for the benefit of this and future generations of the City of Baltimore and the State of Maryland the portion of the City that lies along the north, west and south shores of the Inner Harbor, south of Pratt Street to the water's edge, east of Light Street to the water's edge and north of Key Highway to the water's edge, from the World Trade Center around the shoreline of the Inner Harbor to and including Rash Field, except that, in order to provide eating places and other commercial uses, areas totaling not more than 3.2 acres plus access thereto, within the dedicated space and north of an easterly extension of the south side of Conway Street shall be set aside for such purposes; and except that in order to provide outdoor eating places for the areas known as West Shore Park and Rash Field, areas totaling not more than 0.5 acres within the dedicated space and south of an easterly extension of the south side of Conway Street shall be set aside for such purposes; and except that an area of not more than 3.4 acres shall be set aside for use by the Maryland Science Center, plus access thereto.*

The request would add multi-family dwellings and off-street parking uses and increase the area allowed for non-park uses from 3.2. acres to 4.5 acres.



### Analysis

No recently adopted plans for the area contemplated residential or mixed-use at the Inner Harbor. However, recent history has shown the need to diversify the harbor's economy and add population density that could support the area's commercial tenants. Allowing mixed-use buildings would limit any purely residential structures, which would arguably be the privatization of public access to portions of the harbor.

Additionally, the intent to close the connection between Light Street and Pratt Street would create additional park land, a move supported by Inner Harbor 2.0, the 2013 plan for the Inner Harbor. The current park and public space within this area totals approximately 13.9 acres, and under the new plan the new total will be approximately 18.7 acres. This includes right-of-way abandoned and contributed as well as McKeldin Plaza becoming an interconnected component of Inner Harbor Park.

Note that off-street parking is regulated by the Zoning Code and the Urban Renewal Plan, which do not allow surface parking lots and require screening and roofs for all parking garages.

### **City Council Bill #23-0446/ Zoning – C-5-IH Inner Harbor Subdistrict – Amendment**

#### Proposal

The amendment proposes three alterations to the subdistrict;

- The addition of, “and mixed-use” to the statement that development be “predominately pedestrian-oriented.”
- Remove the phrase, “development is relatively low-scaled to accommodate the view of the harbor from adjoining subdistricts.”
- Remove the 100’ height maximum building height and have no maximum instead.

#### Analysis

The zoning category remains unique from the other C-5 subdistricts in that it maintains no minimum building height and recognizes that development must be oriented to the waterfront.

The URP remains in place and would provide some limits relating to building height and development type within the area, though it is set to expire in 2040. The URP boundaries do not include a small section of C-5-IH that extends east from the World Trade Center property, encompassing all of Pier 3 and Pier 4, to include the National Aquarium and the Powerplant building. Those piers would no longer have a maximum height limit.

It could be beneficial to replicate the process utilized at other waterfront areas in the city through the creation of a Waterfront Overlay for the Inner Harbor. This would simplify the Zoning Code by allowing the removal of the C-5-IH category and instead using the overlay to provide the nuance necessary for this unique area and which is currently provided in the URP, which is set to expire in 2040.

### **City Council Bill #23-0448/ Urban Renewal – Inner Harbor Project I – Amendment 21**

#### Background

The URP boundaries extend from Hanover and Charles Street to the west, Lombard Street to the north, Gay Street or Pier 3 to the east, and Hughes Street to the south. Within this geography the plan identifies a number of development areas (29 total – number 7 is missing, and additional areas are 15a, 15c, 17a, 20a).

The plan includes seven objectives that are broadly intended to beautify the harbor area, allow for safe pedestrian access to the water, and encourage economic development. Additionally, three renewal actions are identified: clearance and redevelopment, demolition, and public improvements.

The plan identifies six land use types that include: Commercial, Residential, Commercial-Residential, Semi-public, Public, and Commercial/Public. Each land use type allows for specific uses which are defined in the plan. A number of uses are prohibited.

The plan identifies Standards and Controls – below are brief descriptions of relevant categories.

**B. Size of Facilities –**

- Uses identified as Office, Housing, Transient Housing, and Retail must be between 2,000,000 square feet and 4,000,000 square feet of gross building area,
- Parking must be between 3,000 and 4,500 spaces, and
- Residential development shall not exceed 250 dwelling units.

**C. Parking –**

- States that parking (except those in Development Areas 9A-9B, 17, and 17a) must be enclosed within structures and roofed and screened from the public, allowing for limited areas for loading and unloading.
- Some development areas have specific parking requirements.

**D. Servicing –**

- Requires that all servicing be located off-street except for the development areas that house the current Harborplace Pavilions.
- Limits outside exhibit or display of merchandise.

**E. Access –**

- Pedestrian – Requires that public pedestrian access be provided by developers (including the Mayor and City Council)
- Vehicular – defined by Development Area
- Boat – Access provided to those development areas adjacent to the water, though they must meet all other permitting requirements.

**H. Development Rights –** States that limited development rights may be granted to developers, and that encroachments on the public right-of-way and public open space are subject to the approval of the Board of Estimates.

**I. Minimum Elevation for Development –** This is no longer relevant as it references outdated flood insurance studies and does not reflect current requirements.

**J. Aesthetic Controls and Reviews –** States that plans and specifications, signs and exterior lighting be submitted for review.

K. Setbacks – States that no buildings may be built in setback areas.

M. Completion – Requires that developers agree to commence and complete construction within reasonable periods of time.

P. Development Area Controls – The plan identifies 29 development areas each of which have specific restrictions that can include setback requirements, use requirements, and maximum building height, among other restrictions.

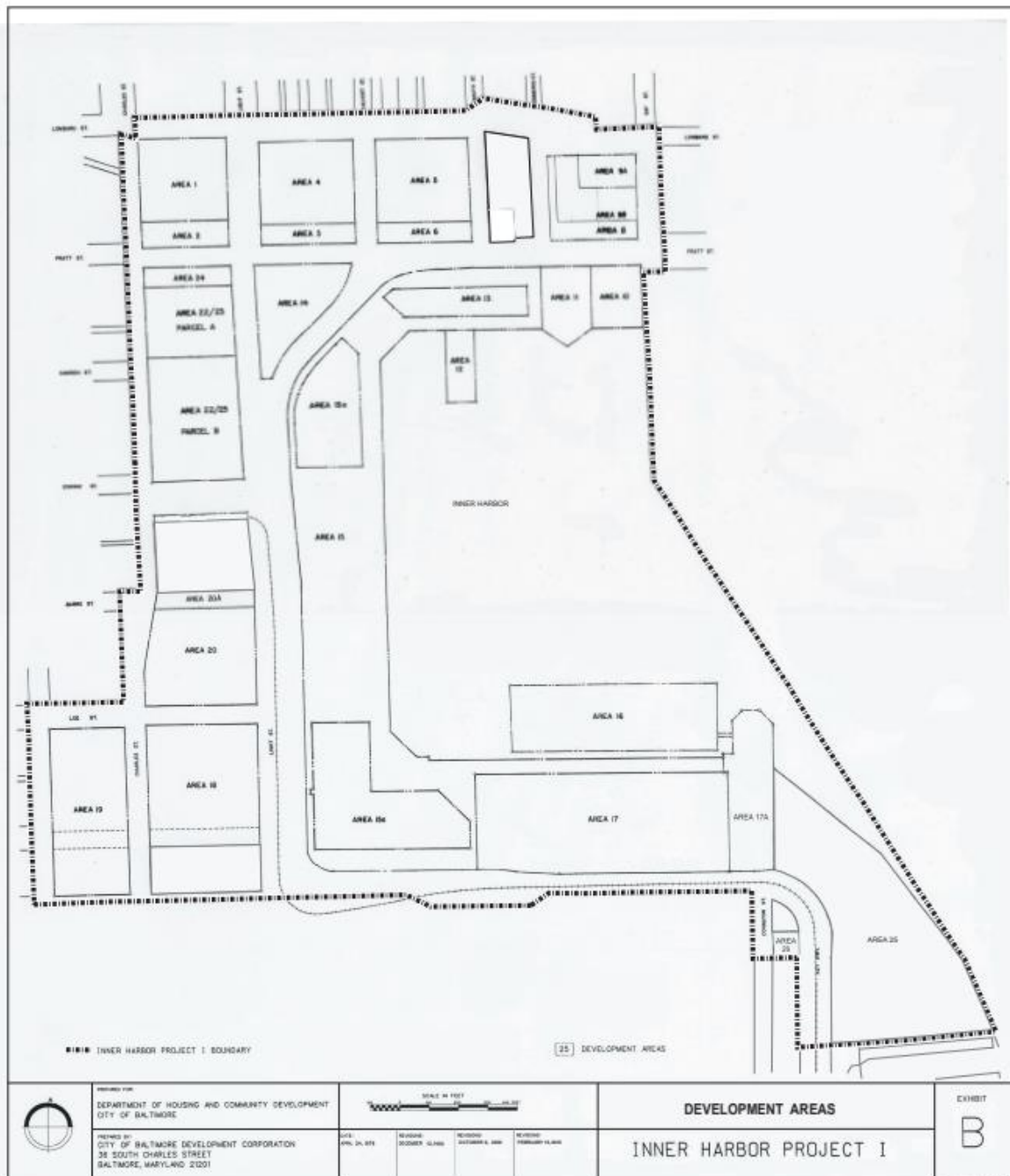


Figure 1: Inner Harbor Project I Urban Renewal Plan - Exhibit B: Development Areas

The Plan also includes Appendix 1: Waterfront Area Controls, which provides specific guidance on Pedestrian Access, Promenade Standards, and Public Access Corridors.

### Proposal

The amendment makes a variety of changes to the URP, including changes to Development Area 13 (north pavilion), Development Area 14 (McKeldin Plaza) and Development Area 15a (south pavilion). These proposed changes are outlined below;

- Land Disposition:
  - Modify language to allow for adjusting parcel and lot lines under agency control. This would allow for the specific development area boundaries to be modified to reflect changes to parcel lines.
- Size of Facilities:
  - Remove limits regarding development size and replace with the underlying zoning for each parcel.
  - Remove limits for dwellings per acre.
- Servicing:
  - Allow for outside exhibit of display of merchandise in Development Areas 13 and 15A.
- Development Area 13 (north Harborplace Pavilion)
  - Add residential use.
  - Remove maximum building height and replace with per underlying zoning.
  - Remove reference to ad hoc Advisory Task Force that would allow for citizen input into the design process and replace with the Urban Design and Architecture Advisory Panel as per Title 4, Subtitle 4 of the Zoning Code.
- Development Area 14 (McKeldin Plaza)
  - Add commercial use.
  - Remove limit on building construction and replace with allowing building construction that is approved by the agency as long as it does not exceed 3 stories, or a total of 20,000 gsf, and that vehicular circulation and parking at or above grade is prohibited.
- Development Area 15a (south Harborplace Pavilion)
  - Add residential use.
  - Remove maximum building height and replace with per underlying zoning.
  - Remove parking prohibition and replace with, “Off-street parking is permitted where expressly approved by the department, provided that the off-street parking is not located at grade and is screened from public view.”
  - Remove reference to ad hoc Advisory Task Force that would allow for citizen input into the design process and replace with the Urban Design and Architecture Advisory Panel as per Title 4, Subtitle 4 of the Zoning Code.

## Analysis

Each aspect of the proposed alterations are analyzed individually below.

- Land Disposition: This proposed change would allow for the specific development area boundaries to be modified to reflect changes to parcel lines, a necessary change as the Inner Harbor changes as the current areas mimic the existing outdated buildings.
- Size of Facilities: The proposed change to replace development limits with the underlying zoning is in keeping with standard practice of the Department of Planning, to reduce confusion during development.
- Servicing: The proposed change is in keeping with the intent of the Inner Harbor as a lively, active area. Furthermore, under the current zoning code outdoor display is allowable, with some rules, for any retail goods establishment (*cf.* Zoning §15-509).
- Development Area 13 (north Harborplace Pavilion):
  - The proposed change to add residential is supplemented by Exhibit C – Land Use, which identifies that Development Area 13 would be commercial/residential. The introduction of mixed-use maintains the current level of access to the space which, is public through the commercial designation.
  - The removal of the height limit does not impact the promenade which is protected from development. The removal of the limit would also match the zoning directly across both Pratt and Light Streets.
  - The creation of a separate task force within a URP is generally discouraged as history has shown that these bodies are not sustainable in the long term. Instead it would be good to clarify the public process that the proposal must abide by and when public testimony and input is required.
- Development Area 14 (McKeldin Plaza):
  - The addition of commercial is supplemented by Exhibit C – Land Use, which identifies that Development Area 14 would be commercial/public. This expands the park space as the limit on building size lessens the impact.
  - Removing the limit on building construction and requiring that building construction be approved by the agency as long as it does not exceed 3 stories, or a total of 20,000 gsf, does not give the area the flexibility needed for unknown future development. The limit on commercial use within Inner Harbor Park, which per the boundaries would include McKeldin Plaza once the spur road is removed, provides limits on potential development area.
- Development Area 15a (south Harborplace Pavilion):
  - The proposed change to add residential is supplemented by Exhibit C – Land Use, which identifies that Development Area 15a would be commercial/residential. The introduction of mixed-use maintains the current level of access to the space which, is public through the commercial designation.
  - The removal of the height limit does not impact the promenade which is protected from development. The removal of the limit would also match the zoning directly across both Pratt and Light Streets.

- The expansion of parking would not be of surface parking which is prohibited. All parking must be shielded. This alteration would not negatively impact the public space.
- The creation of a separate task force within a URP is generally discouraged as history has shown that these bodies are not sustainable in the long term. Instead it would be good to clarify the public process that the proposal must abide by and when public testimony and input is required.

**Equity:**

- Impact:
  - The harbor is impactful to residents of all of Baltimore as well as the wider region, tourists, and others. As such, there are a large number of stakeholders both known and unknown who will be impacted by the proposed amendments. While these amendments are not specific to the proposed development, in the short term they enable that development and potentially other unforeseen development. In the long term, the items discussed today would allow for denser development than has existed at the Harbor since it was a functional commercial harbor.
  - The Inner Harbor has long been a unique location in the city, attracting a diverse population from all across the city, as well as tourists. This special place has not been without its issues, and in recent years it has struggled to respond to the needs of youth who often need a third place between school and home - and have long used the Harbor and its retail options as such. This proposal would not impact the patterns of inequity toward youth. Additionally, affordable housing is a long pressing issue in the city. While the addition of mixed-use at this location would likely not include affordable housing, more housing in general results in housing affordability long term.
- Engagement:
  - The development team has discussed these bills at several meetings where the development was presented including the November 3<sup>rd</sup> public forum at Coppin State and the November 6<sup>th</sup> public forum at the Federation for the Blind. A FAQ section is included on their website and discussed in most of their design meetings.
- Internal Operations:
  - These bills will have minimal impact to staff operations.

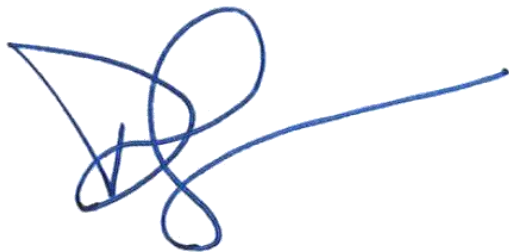
**Notification:** Notice of this item was emailed to over 100 individuals as well as representatives from Downtown Partnership of Baltimore, Market Center CDC, City Center Residents Association, Downtown Residents Advocacy Network and others. Notice of this item was also published via GovDelivery to over 18,500 subscribers.

**Recommendation:** Approve with amendments, and further recommend exploring the creation of a Waterfront Overlay for the Inner Harbor based on the other Waterfront Overlay areas within the city. This would allow for the eventual elimination of the C-5-IH zoning category as well as the eventual repeal of the URP.

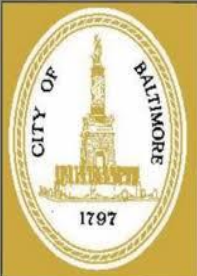
**Amendments:**

**City Council Bill #23-0448/ Urban Renewal – Inner Harbor Project I – Amendment 21**

- Remove parking requirement of 3,000 – 4,500 and instead utilize underlying zoning.
- Strike the content of Section I. Minimum Elevation for Development and replace with reference to Floodplain and Critical Area requirements as per Article 7 - *Natural Resources*, etc.
- For Development Area 14 remove proposed language limiting height and gross square footage.
- For Development Areas 13 and 15a remove reference to UDAAP and instead replace the ad hoc Advisory Task Force with requirement that all preliminary and final development plans must complete all required planning reviews including but not limited to Planning Commission, Design Review, Site Plan Review Committee, and environmental reviews.
- Modify Appendix 1 – Waterfront Area Controls to include Lot 15.
- Modify Exhibit F to include the pedestrian promenade along the entire harbor and public access corridors identified by the development team – as proposed by applicant.

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

**Chris Ryer  
Director**

|             |                                  |  |   |   |
|-------------|----------------------------------|--|---|---|
| <b>FROM</b> | <b>NAME &amp; TITLE</b>          | Richard J. Luna, Interim Director                                | CITY of<br>BALTIMORE<br><br><i>MEMO</i> |  |
|             | <b>AGENCY NAME &amp; ADDRESS</b> | Department of Public Works<br>600 Abel Wolman Municipal Building |   |   |
|             | <b>SUBJECT</b>                   | City Council Bill 23-0448  |   |   |

February 2, 2024

**TO:** Economic and Community Development Committee

I am herein reporting on City Council Bill 23-0448 introduced by Councilman Costello and Council President Mosby on behalf MCB HP of Baltimore, LLC.

The purpose of the Bill is to amend the Urban Renewal Plan for Inner Harbor Project I, including the Development Area controls for certain areas; the Land Use and Proposed Zoning exhibits; waive certain content and procedural requirements; make the provisions of this Ordinance severable; provide for the application of this Ordinance in conjunction with certain other ordinances; and provide for a special effective date.

The Urban Renewal Plan for Inner Harbor Project I was established by Ordinance 67-1045 and was last amended by Ordinance 15-327. The Urban Renewal Plan is bounded on the west by Hanover and Charles Street, on the north by Lombard Street, on the east by Gay Street/Pier 3, and on the south by Hughes Street, and includes multiple development areas. The intent of the Plan is to enhance the Inner Harbor area as an open and attractive space for all to enjoy the waterfront, while encouraging new economic development opportunities within the defined area of the Plan. Land uses were limited to Commercial, Residential, Commercial/Residential, Public, Semi-public, and Commercial/Public. As with most urban renewal plans, some uses were prohibited. The Plan provides for standards, controls, and reviews for such issues as screening of parking and loading areas, public access from landside and waterside, and required setbacks and maximum building heights. The Plan also provides specific restrictions for the 29 development areas and does allow for limited development rights to be granted to developers.

In general, City Council Bill 23-0448 is proposing changes to the Urban Renewal Plan to allow for a reimagining and refreshing of this important gathering place. If approved, the legislation would do the following:

- The development limits that are currently in the Plan would be replaced with the underlying zoning controls; a process that has been followed with many older urban renewal plans that pre-date the 2017 Zoning Code.



- The development area parcel lines could be adjusted to accommodate new development, as many of these current boundaries reflect the shape of existing older buildings and their required setbacks.
- Development Area 13 (the north Harborplace Pavilion) would have residential use added to the current commercial use, creating the potential for a mixed-use structure. Height limitations would be controlled by the underlying zoning (these limits would be the same as the height limits directly across Pratt and Light Streets). The promenade would continue to be protected from development.
- Development Area 14 (McKeldin Plaza) would have commercial use added, creating a commercial/public use area, with limits on the commercial space dictated by the overall Inner Harbor controls. A larger park area would be made possible with the elimination of the spur road from Light Street onto Pratt Street.
- Development Area 15a (the south Harborplace Pavilion), like Development Area 13, would have residential use added to the current commercial use, creating the potential for a mixed-use structure. The height limitations would be controlled by the underlying zoning (the same as the height limits directly across Pratt and Light Streets). Parking could be expanded, but the development of surface parking would be prohibited.

The Department of Public Works is one of several agencies that routinely reviews development plans, utility connections, and building permits. It is anticipated that the reviews that could be generated by this proposed change to the Urban Renewal Plan would not place an undue fiscal or staffing burden on the agency.

The Department of Public Works supports passage of City Council Bill 23-0448 for the opportunities it provides to revive the Inner Harbor for the enjoyment and benefit of residents, businesses, and visitors.

Sincerely,



Richard J. Luna  
Interim Director

RJL:MMC



## MEMORANDUM

To: The Honorable President and Members of the Baltimore City Council  
c/o Natawna Austin, Executive Secretary

From: Alice Kennedy, Housing Commissioner

Date: February 13, 2024

**Re: City Council Bill 23-0448 Urban Renewal - Inner Harbor Project I - Amendment 21**

### Introduction

The Department of Housing and Community Development (DHCD) has reviewed City Council Bill 23-0448 for the purpose of amending the Urban Renewal Plan for Inner Harbor Project I; amending the Development Area Controls for certain development areas; amending the Land Use and Proposed Zoning exhibits to the Plan; waiving certain content and procedural requirements, making the provisions of this Ordinance severable; providing the application of this Ordinance in conjunction with certain other ordinances; and providing for a special effective date.

If enacted, this bill would make a variety of changes to the Urban Renewal Plan (URP) for the Inner Harbor by modifying Land Disposition, Size of Facilities, Services, Development Area 13 (North Harborplace Pavilion), Development Area 14 (McKeldin Plaza), and Development Area 15a (South Harborplace Pavilion).

### DHCD Analysis

At its regular meeting of December 21<sup>st</sup>, 2023, the Planning Commission concurred with the recommendation of its Departmental staff and recommended the Bill be amended and approved by the City Council. Planning staff recommended exploring the creation of a Waterfront Overlay for the Inner Harbor based on other Waterfront Overlay areas within the city. This could allow for the eventual elimination of the C-5-IH zoning category as well as the repeal of the URP.

The modifications proposed in this Bill would update the Development Area Controls for certain development areas and amend the Land Use and Proposed Zoning Exhibits to reflect changes to the Plan to enable the development supported by companion Bills 23-0444 and 23-0446 to accommodate a wider range of uses. The changes to the URP may help to address the housing shortage, that exists both in Baltimore and State-wide, by providing additional residential housing options that would complement the existing recreational and commercial uses around the harbor by adding population density that could support the area's commercial tenants. The changes may improve the pedestrian environment and allow for new construction that is compatible with existing development.

The subject property is not located within any of DHCD's Impact Investment Areas, Community Development Zones, or Streamlined Code Enforcement Areas. The Bill does not have an operational or fiscal impact on DHCD and the proposed changes to the URP would not endanger public health, safety or welfare.

## Conclusion

DHCD respectfully requests a **favorable** report on City Council Bill 23-0448.

*AK/sm*

*cc: Ms. Nina Themelis, Mayor's Office of Government Relations*

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CITY OF BALTIMORE

Brandon M. Scott, Mayor



BOARD OF MUNICIPAL AND  
ZONING APPEALS

Rebecca Lundberg Witt, *Acting Executive  
Director*

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11/7/2023

The Honorable President and  
Members of the City Council  
City Hall  
100 N. Holliday Street  
Baltimore, MD 21202

**Re: CC Bill #23-0448- Urban Renewal- Inner Harbor Project I- Amendment 21**

Ladies and Gentlemen:

City Council Bill No. 23-0448 has been referred by your Honorable Body to the Board of Municipal and Zoning Appeals for study and report.

Pursuant to Article 32, Section 5-507 (b) the BMZA shall provide reports on legislation submitted to the City Council Section per Section 5-501 (2) which includes the following: (i) a variance; (ii) a conditional use; (iii) a map amendment; (iv) an educational campus master plan; (v) a hospital general development plan; (vi) an area of special sign control; and (vii) a planned unit development. The BMZA, as a quasi-judicial agency, will not be providing a report or comment.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca R Witt".


Rebecca Lundberg Witt  
Acting Executive Director

CC: Mayor's Office of Council Relations  
City Council President  
Legislative Reference





## MEMORANDUM

**DATE:** February 5th, 2024  
**TO:** Economic & Community Development Committee  
**FROM:** Colin Tarbert, President and CEO   
**POSITION:** Support  
**SUBJECT:** City Council Bill No. 23-0448  
Urban Renewal – Inner Harbor Project 1 – Amendment 21

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### **INTRODUCTION**

The Baltimore Development Corporation (BDC) is reporting on City Council Bill No. 23-0448 introduced by Councilmember Costello.

### **PURPOSE**

This bill seeks to amend the Urban Renewal Plan for Inner Harbor Project I to expand the Development Area Controls as well as changing the current zoning and land use requirements. This amendment is necessary to facilitate a proposed redevelopment of Harborplace.

### **BRIEF HISTORY**

The Inner Harbor Project I Urban Renewal Plan (URP) sets development controls, standards, and use restrictions for a significant number of properties within the URP footprint. Primarily, this amendment makes changes to the Development Areas pertaining to Harborplace (Areas 13 & 15a) and McKeldin Plaza (Area 14), by specifically allowing for mixed-use and commercial development in those areas, aligning building limits with the underlying zoning for the parcels, and ensuring that all future development plans go through the City's standard processes for design approval. Other Development Areas in the URP, including areas dedicated as Open/Public Space in Areas 15a and 17, are not modified, and will remain dedicated public spaces.

The redevelopment of Baltimore's Harborplace is one of the most important projects the City will undertake in the near future. The owner of the Harborplace pavilions has released plans for their vision of the site which require, among other elements, changes to the zoning, land use, height and massing restrictions currently in place for the site and legally enshrined in the Urban Renewal Plan. Under current code, Harborplace is limited to the height and massing currently in place. In order to achieve any redevelopment of the property that will include greater diversity of uses, commercial density, increased public access and visibility to the water, and enhanced

public spaces on the private Harborplace properties, modifications to the Urban Renewal Plan, Zoning Code, and City Charter are necessary.

**FISCAL IMPACT**


None.

**AGENCY POSITION**

The Baltimore Development Corporation respectfully **supports** City Council Bill No. 23-0448, and companion bills 23-0444 (Charter amendment) and 23-0446 (Zoning Modifications C-5-IH). If you have any questions, please contact Kim Clark at 410-837-9305 or [KClark@baltimoredevelopment.com](mailto:KClark@baltimoredevelopment.com).

cc: Nina Themelis, Mayor's Office of Government Relations

[TW]

|                            |                       |  |                                       |   |
|----------------------------|-----------------------|--|---------------------------------------|---|
| <b>F<br/>R<br/>O<br/>M</b> | NAME & TITLE          | Corren Johnson, Director   | <b>CITY of<br/>BALTIMORE<br/>MEMO</b> |  |
|                            | AGENCY NAME & ADDRESS | Department of Transportation (DOT)<br>417 E Fayette Street, Room 527 |                                       |   |
|                            | SUBJECT               | Council Bill 23-0448   |                                       |   |

DATE: 2/5/2023

TO: Mayor Brandon Scott  
TO: Economic and Community Development Committee  
FROM: Department of Transportation  
POSITION: **No Objection**  
SUBJECT: Council Bill 23-0448

**INTRODUCTION** – Urban Renewal - Inner Harbor Project I - Amendment 21

**PURPOSE/PLANS** – For the purpose of amending the Urban Renewal Plan for Inner Harbor Project I; amending the Development Area Controls for certain development areas; amending the Land Use and Proposed Zoning exhibits to the Plan; waiving certain content and procedural requirements, making the provisions of this Ordinance severable; providing the application of this Ordinance in conjunction with certain other ordinances; and providing for a special effective date.

**COMMENTS** – Council Bill 23-0448 would apply numerous amendments to the existing Inner Harbor Urban Renewal Plan. Most notable to Baltimore City DOT is the proposed amendment that would allow for the modification of existing parcel boundaries. Though City DOT doesn't have oversight of the existing Inner Harbor parcels, the agency is responsible for maintaining public ROW abutting the parcels. A notable example is the Light Street slip lanes that separate McKeldin Plaza from the main Inner Harbor concourse area. Additionally, the removal of existing off-street parking restrictions will be closely monitored by the agency to ensure full compliance with the City's Complete Streets Ordinance.

**AGENCY/DEPARTMENT POSTION** – Inner Harbor redevelopment efforts are subject to existing regulatory oversight by City DOT, including the City's formal Site Plan Review process and the DOT's Traffic Mitigation Program. Baltimore City's Zoning Code requires 1 permanent bike parking space per every 3 dwelling units and 1 temporary bike parking space per every 6 dwelling units. Baltimore City Department of Transportation has **no objection** towards the advancement of Council Bill 23-0448.

If you have any questions, please do not hesitate to contact Liam Davis at [Liam.Davis@baltimorecity.gov](mailto:Liam.Davis@baltimorecity.gov) or at 410-545-3207

Sincerely,

Corren Johnson,  
Director





**PARKING**  
OF BALTIMORE CITY  
**AUTHORITY**

**MEMORANDUM**

**To:** Nick J. Mosby, President, Baltimore City Council

**From:** Peter Little, Executive Director

**Date:** January 30, 2024

**Subject:** City Council Bill 23-0448

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I am herein reporting on City Council Bill 23-0448 introduced by Councilmember Costello and President Mosby at the request of MCB HP Baltimore, LLC, c/o Caroline Hecker, Esq.

The purpose of this bill is to amend the Urban Renewal Plan for Inner Harbor Project I to allow for a variety of changes, including allowing public and commercial use in the McKeldin Plaza area, allowing commercial and residential use in both pavilion areas, and allowing for screened off-street parking (not at grade) in the south pavilion area.



The Parking Authority of Baltimore City (PABC) has reviewed the proposed legislation and the Planning Commission report. PABC staff conducted site visits in November and December of 2023. The two pavilion areas currently have adjacent loading. Other than the loading areas, these parcels are not located within any PABC-administered programs.

The proposed legislation changes the wording of the Inner Harbor Project Urban Renewal Plan on the Size of Facilities so that is to be determined by the zoning for each parcel. PABC is in agreement with Planning that this change brings the Inner Harbor URP area into alignment with the rest of the zoning code. As most of the URP area is C-5 (either C-5DC or C-5-IH), current zoning makes these parcels exempt from parking requirements, as the Downtown Core and Inner Harbor C-5 subzones are defined as predominately pedestrian-oriented.

PABC encourages the developer/owner to consider shared parking arrangements. A recent PABC survey of off-street spaces around the Inner Harbor found approximately 9,000 off-street spaces available on evenings and weekends. Shared parking arrangements could help minimize vehicular congestion and focus improvements on the walkability of the site.

Passage of this bill may have minor fiscal impact on PABC programs via possible increased usage of metered parking and PABC-managed off-street parking around the Harbor due to the development of new uses.

Based on the comments above, the PABC respectfully requests a favorable report on City Council Bill 23-0448 including the amendments put forth by the Department of Planning.

|                            |                       |  |   |   |
|----------------------------|-----------------------|--|---|---|
| <b>F<br/>R<br/>O<br/>M</b> | Name & Title          | Reginald Moore<br>Executive Director                  | CITY OF<br>BALTIMORE<br><br><b>MEMO</b> |  |
|                            | Agency Name & Address | Baltimore City Department of Recreation & Parks<br>3001 East Drive, Baltimore, Maryland<br>(MD) 21217<br><br>City Council Bill 23-0448 |   |   |
|                            | Subject :             | Urban Renewal – Inner Harbor Project I –<br>Amendment 21 (Eleventh District)   |   |   |

**DATE:** February 1, 2024

**TO:** The Honorable City Council President Nick Mosby  
Members of the City Council  
2529855474073760651.doc City Hall, Room 400  
100 North Holliday Street  
Baltimore, MD 21202

Baltimore City Recreation & Parks (BCRP) has been referred City Council Bill 23-0448, for the purpose of amending the Urban Renewal Plan for Inner Harbor Project I; amending the Development Area Controls for certain development areas; amending the Land Use and Proposed Zoning exhibits to the Plan; waiving certain content and procedural requirements, making the provisions of this Ordinance severable; providing the application of this Ordinance in conjunction with certain other ordinances; and providing for a special effective date.

The Department of Planning (DOP) and the Baltimore City Planning Commission provide oversight of these proposed amendments. DOP has done extensive review of this legislation and the amendments proposed to the Urban Renewal Plan, which has been approved by the Planning Commission. We fully support DOP and the Planning Commission, therefore BCRP supports this legislation.

If you have any questions, please contact Jenny Morgan at [jmorgan@baltimorecity.gov](mailto:jmorgan@baltimorecity.gov).



Reginald Moore  
Executive Director

**ECONOMIC AND COMMUNITY  
DEVELOPMENT COMMITTEE**

**23-0448  
ADDITIONAL DOCUMENTS**

Maryland The Daily Record  
200 St. Paul Place  
Baltimore, MD, 21202  
Phone: 4435248100

MARYLAND  
**THE DAILY RECORD**

**Affidavit of Publication**

To: Phylcia Porter -  
100 Holliday St, Room 527  
Baltimore, MD, 212023427

Re: Legal Notice 2576176,  
PUBLIC HEARING ON BILL NO. 23-0448

We hereby certify that the annexed advertisement was published in Maryland The Daily Record, a Daily newspaper published in the State of Maryland 2 time(s) on the following date(s): 01/30/2024 and 02/06/2024

By



Joy Hough  
Authorized Designee of the Publisher

**Baltimore City**

**BALTIMORE CITY COUNCIL  
PUBLIC HEARING ON BILL NO. 23-0448**

The Economic and Community Development Committee of the Baltimore City Council will conduct a public hearing on City Council Bill No. 23-0448 on Tuesday, February 13th, 2024, at 2:03 p.m. in the Clarence "De" Burns Chamber, City Hall, 100 N. Holliday Street, 4th Floor, Baltimore, MD 21202. Information on how the public can participate in the hearing virtually, via Webex, will be available at <https://baltimore.legistar.com/Calendar.aspx>.

**CC 23-0448 - Urban Renewal - Inner Harbor Project I - Amendment**

For the purpose of amending the Urban Renewal Plan for Inner Harbor Project I; amending the Development Area Controls for certain development areas; amending the Land Use and Proposed Zoning exhibits to the Plan; waiving certain content and procedural requirements, making the provisions of this Ordinance severable; providing the application of this Ordinance in conjunction with certain other ordinances; and providing for a special effective date,

**Sharon Green Middleton**  
Chair

ja0018 2376176

MARYLAND  
**THE DAILY RECORD**

A Division of BridgeTower Media  
P.O Box 745929  
Atlanta, GA 30374-5929

Invoice # 745672475  
Invoice Date 02/06/2024  
Customer Phylicia Porter, ID: 252775  
Payment Terms Net 30  
Due Date 03/07/2024

**BILLING ADDRESS**

Phylicia Porter  
100 Holliday St Room 527  
Baltimore MD 212023427

**ADVERTISER**

Phylicia Porter, ID: 252775  
100 Holliday St Room 527  
Baltimore MD 212023427

| INVOICE REF | MEDIA                                  | DATE     | PO | EDITION            | QTY | AD SIZE            |
|-------------|--|----------|----|--------------------|-----|--------------------|
| 1007244874  | The Daily Record (BLT) - Public Notice | 01/30/24 |    | Legal - Government | 1   | Legal - Government |
| 1007250061  | The Daily Record (BLT) - Public Notice | 02/06/24 |    | Legal - Government | 1   | Legal - Government |

Thank you for your business!  
IOID: 2576176  
Index: Government - Baltimore City  
Category: Baltimore City  
Affidavit Reference: PUBLIC HEARING ON BILL NO. 23-0448

|                    |          |
|--------------------|----------|
| <b>Subtotal</b>    | \$251.00 |
| <b>Tax</b>         | \$0.00   |
| <b>Credits</b>     | \$0.00   |
| <b>BALANCE DUE</b> | \$251.00 |

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**REMITTANCE STUB TO BridgeTower Media**

|                         |  |             |            |                    |                             |
|-------------------------|--|-------------|------------|--------------------|-----------------------------|
| <b>Invoice #</b>        | 745672475 The Daily Record (BLT) - Public Notice | <b>Date</b> | 03/07/2024 | <b>Customer ID</b> | ID: 252775, Phylicia Porter |
| <b>Amount Enclosed:</b> |  |             |            |                    |                             |

**Acceptable Payment Methods**

|  |  |   |  |
|--|--|---|--|
| <p><b>PREFERRED METHOD</b><br/><b>To Pay by ACH Transfer:</b><br/>Bank: Bank of America<br/>Send ACH remittance email to ar@bridgetowermedia.com<br/>Account Number: 237025443017<br/>Routing: 053000196</p> | <p><b>OTHER METHODS</b><br/><b>To Pay by Check use the following address:</b><br/>Please include invoice number on check<br/>BridgeTower OpCo, LLC<br/>P.O Box 745929<br/>Atlanta, GA 30374-5929</p> | <p><b>To Pay by Credit Card:</b><br/>Use the Click to Pay Online link located on the email you received or Contact Accounts Receivable: 866-802-8214<br/>Please have your Invoice Number and Credit Card Number Ready</p> | <p><b>To Pay by Wire Transfer:</b><br/>Name: BridgeTower OpCo, LLC<br/>Bank: Bank of America<br/>Swift Code: BOFAUS3N<br/>Bank Address: 100 North Tryon Street<br/>Charlotte, NC 28255<br/>Account Number: 237025443017<br/>Routing: 053000196</p> |
|--|--|---|--|

**Baltimore City Council**  
**Certificate of Posting - Public Hearing Notice**

Today's Date: [02/01/2024]

**City Council Bill No.: 23-0448**



*(Place a picture of the posted sign in the space below.)*

**Address: 201 Pratt Street Harborside Frontage**

**Date Posted: February 1, 2024**

**Name: Martin Ogle**

**Address: 9912 Maidbrook Road Parkville Md, 21234**

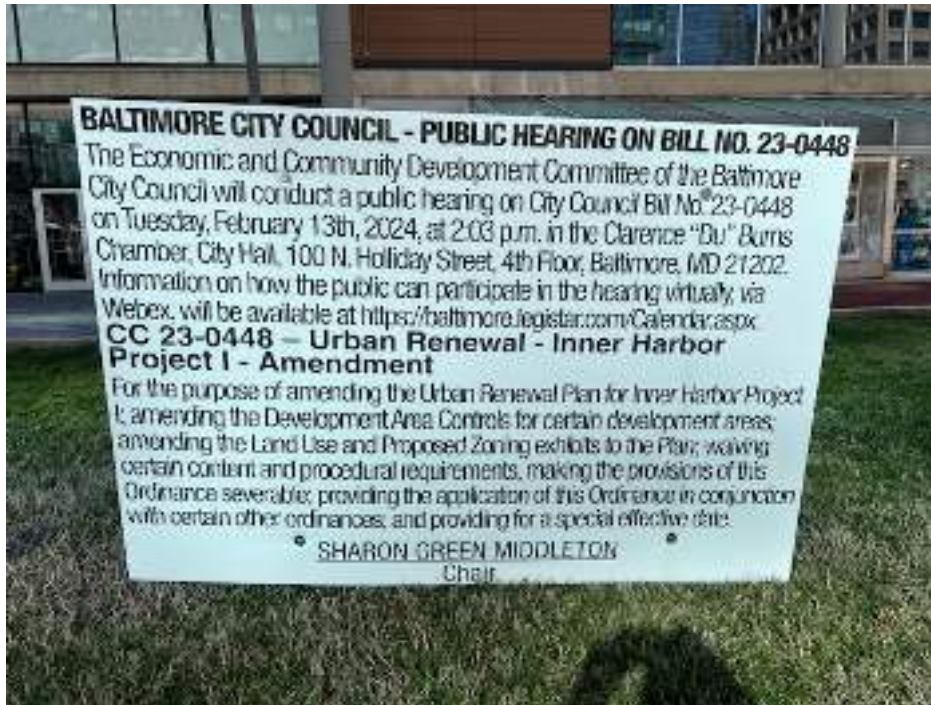
**Telephone: 443-629-3411**

- 
- Email to: [Natawnab.Austin@baltimorecity.gov](mailto:Natawnab.Austin@baltimorecity.gov)
- Mail to: Baltimore City Council; c/o Natawna B. Austin; Room 409, City Hall; 100 N. Holliday Street; Baltimore, MD 21202

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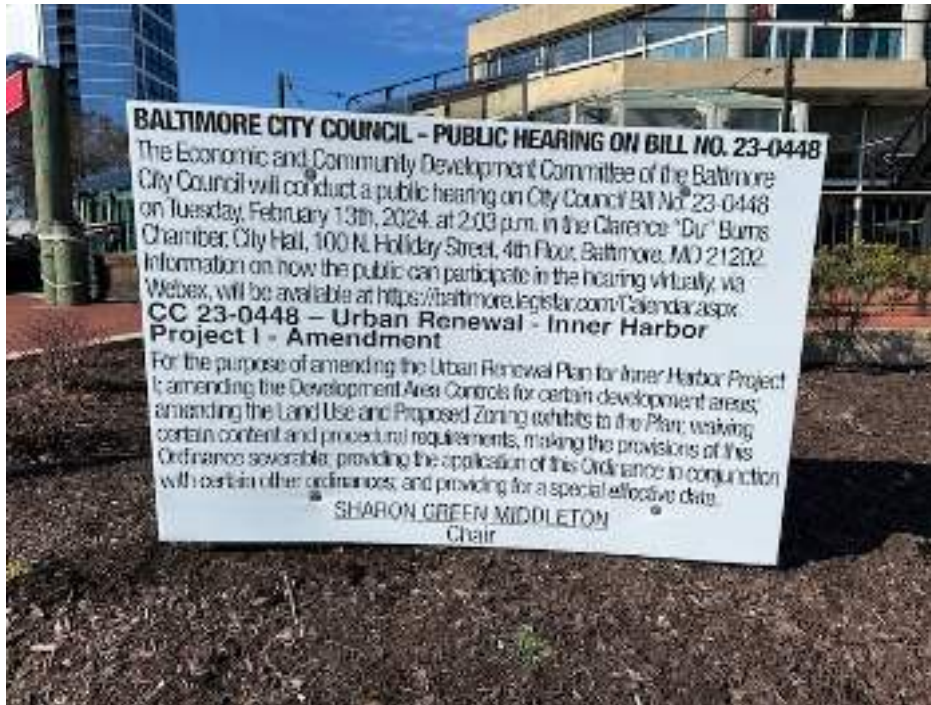
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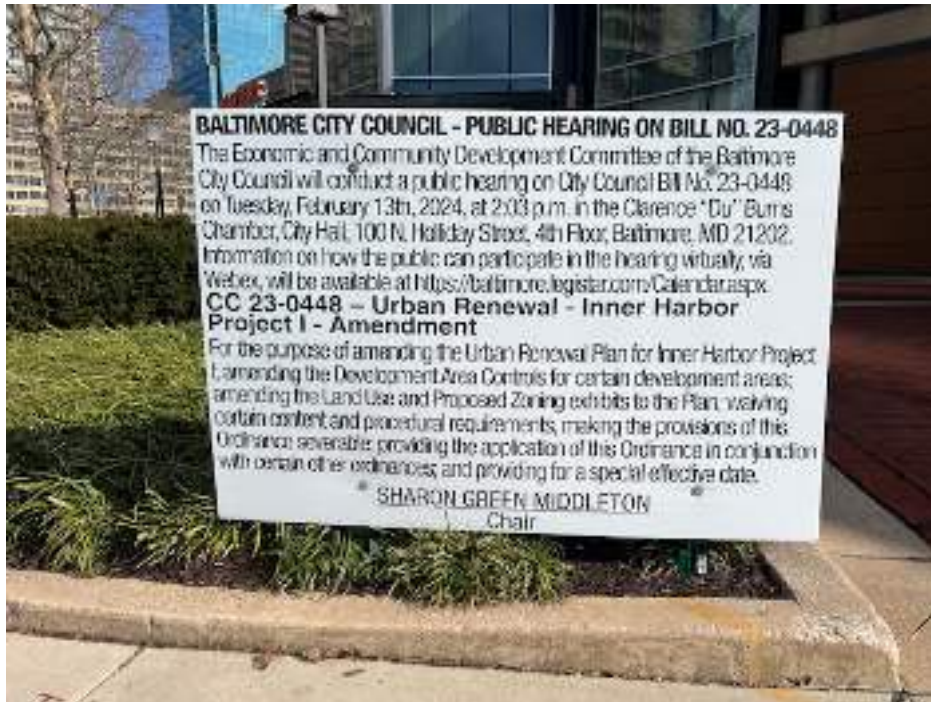
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**ECONOMIC AND COMMUNITY  
DEVELOPMENT COMMITTEE**

**23-0448  
PUBLIC TESTIMONY  
DOCUMENTS**

February 11, 2024

To the Economic and Community Development Committee of the Baltimore City Council,

As a member of the Inner Harbor Coalition, I write in opposition to 23-0444 Charter Amendment – Inner Harbor Park and submit for consideration and context three exhibits:

- 1) A timeline of the history of Harborplace with links to articles that show how the property's issues are due not because of the concept being wrong (the revitalization of Norfolk's Waterside shows that's not the case), but because of Ashkenazy Acquisitions' mismanagement and how Baltimore City has been outmaneuvered by developers:
  - First being caught off guard in 2012 by General Growth Properties' sale of Harborplace to Ashkenazy two months after negotiating a 33-year lease extension in exchange for higher rents (which the city never collected on).
  - Second, forgoing ground rent from July 2014 to October 2019 in exchange for a public works project (unclear what that was), which meant that Ashkenazy could not fall behind on rent and the city could not intercede. It was left to Deutsche Bank to step in after Ashkenazy missed its loan payment.
- 2) & 3) A more recent timeline (since 2022) of MCB's purchase and much-lauded community input sessions, showing how implausible it is that the community's input played a significant role in what has been presented as the design. Public trust is already so eroded and this process will only feed the anger:
  - Participants were shown alternate city concepts on September 30 just one month before the final concept unveiling.
  - July 13, MCB announced that four firms had been hired and would begin work off of the initial June 3 public forum. Attached is a word cloud of that session from MCB's own report. Neither offices or apartments are mentioned. MCB has put its agenda first and foremost, with public input as little more than window dressing.

The Inner Harbor was supposed to be "dedicated perpetually as public open space so as to be forever available for public use." It's a public trust, not a cash machine. We can do better for now and for the future.

Sincerely,

Phyllis Fung

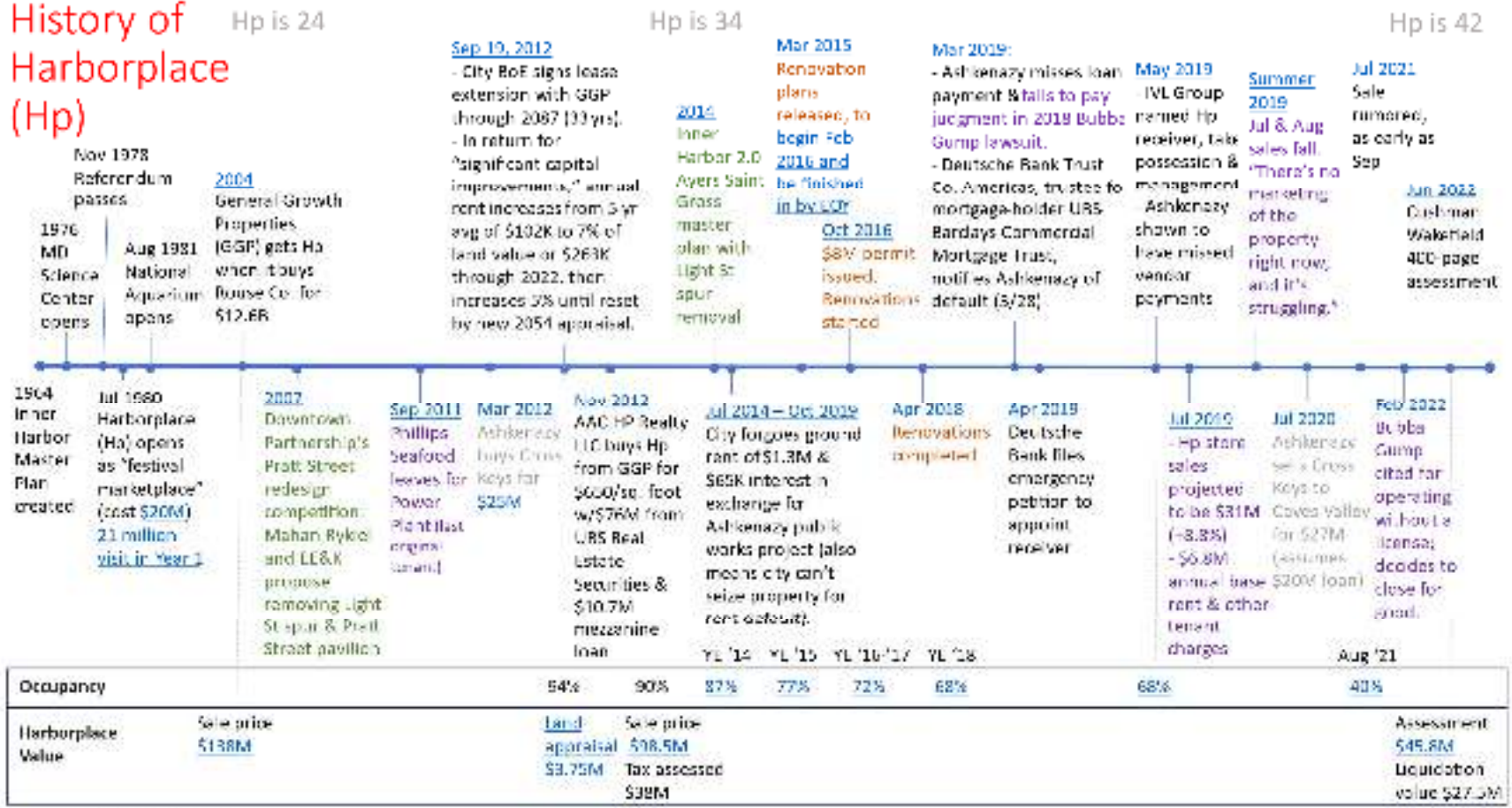
2134 Cambridge Street, Baltimore, MD 21231

[Phyllis.fung@gmail.com](mailto:Phyllis.fung@gmail.com)

202-812-3864

Exhibit 1: Harborplace timeline

# History of Harborplace (Hp)



## Links to citations for Exhibit 1

### Timeline

- <https://www.baltimoremagazine.com/section/businessdevelopment/harborplace-inner-harbor-history-and-future-can-twin-pavilions-still-thrive/>
- <https://www.aacrealty.com/press/dollar100-million-paid-for-harborplace>
- <https://baltimorebrew.com/2012/09/18/harborplace-to-pay-higher-rent-for-pavilions/>
- <https://www.baltimoresun.com/2012/11/10/ashkenazy-future-owner-of-harborplace-cuts-bad-investments-loose/>
- [https://www.baltimorecity.gov/sites/default/files/Inner Harbor Final Report\\_11112013red.pdf](https://www.baltimorecity.gov/sites/default/files/Inner_Harbor_Final_Report_11112013red.pdf)
- <https://www.bizjournals.com/baltimore/news/2019/12/13/saving-harborplace-how-a-struggling-city-and.html>
- <https://www.southbmore.com/2017/03/01/photo-updates-development-around-the-inner-harbor/>
- <https://www.bizjournals.com/baltimore/news/2019/06/07/heres-what-harborplace-might-have-looked-like-with.html>
- <https://www.bizjournals.com/baltimore/news/2016/10/24/8m-permit-issued-for-pratt-street-pavilion.html>
- <https://www.cbsnews.com/baltimore/news/harborplace-renovations-ending/>
- <https://www.baltimoresun.com/2019/06/03/judge-takes-baltimores-harborplace-out-of-owners-control-paving-way-for-possible-sale/>
- <https://www.baltimoresun.com/2019/10/04/tenants-at-baltimores-harborplace-struggled-over-the-summer-report-shows/>
- <https://www.baltimoresun.com/2012/03/07/village-of-cross-keys-sold-to-retail-and-property-investor/>
- <https://www.bizjournals.com/baltimore/news/2021/07/16/developer-take-ownership-of-harborplace-baltimore.html>
- <https://www.cbsnews.com/baltimore/news/bubba-gump-shrimp-co-at-harborplace-closes-citing-covid-19-building-maintenance/>
- <https://www.wbaltv.com/amp/article/baltimore-harborplace-sale-nears-approval/41412812>

### Occupancy & Harborplace Value

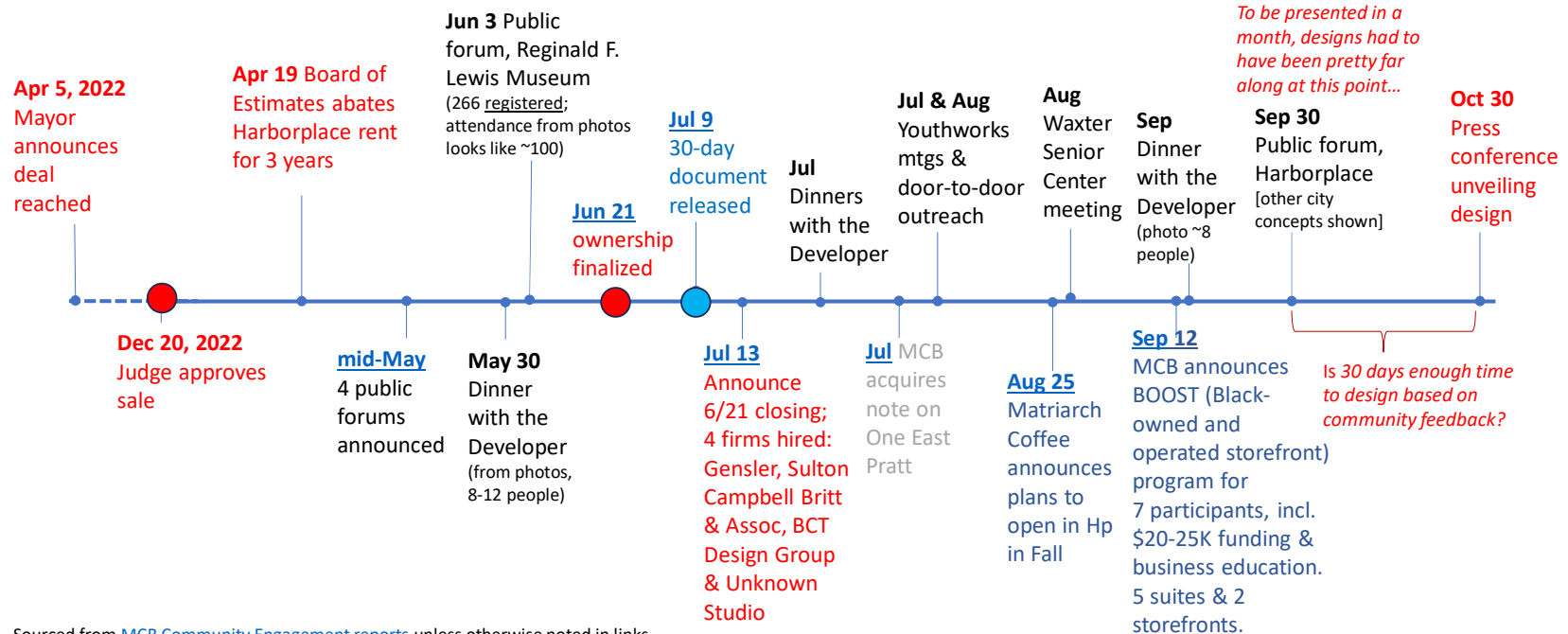
- <https://baltimorebrew.com/2012/09/18/harborplace-to-pay-higher-rent-for-pavilions/>
- <https://www.aacrealty.com/press/dollar100-million-paid-for-harborplace>
- <https://www.fitchratings.com/research/structured-finance/ubs-barclays-commercial-mortgage-trust-2013-c5-focus-report-25-11-2019>
- <https://www.baltimoresun.com/2019/07/24/sales-down-for-some-key-tenants-at-baltimores-harborplace-where-nearly-a-third-of-spaces-are-vacant/>
- <https://www.baltimoremagazine.com/section/businessdevelopment/harborplace-inner-harbor-history-and-future-can-twin-pavilions-still-thrive/>
- <https://www.bizjournals.com/baltimore/news/2023/07/13/harborplace-mbc-closing-baltimore-design-team.html>

## Exhibit 2: Recent timeline

# Public timeline 2023

"We started with Community Engagement before we even owned the property." –David Bramble, p. 3 *Community Engagement Fall Report*

"Harborplace is Baltimore's postcard image. It should visually capture what we are most proud of about our city and how we want to be known in the world — a place where all of our people can enjoy the iconic Inner Harbor and the first place we should all want to share with visitors to our city. **We want Harborplace to be uniquely and authentically us.**" Vaki Mawema, managing director of Gensler's Baltimore office. *The Baltimore Business Journal*, July 13, 2023



Sourced from [MCB Community Engagement reports](#) unless otherwise noted in links.

### Additional links:

- <https://www.bizjournals.com/baltimore/news/2023/05/17/harborplace-future-first-public-forum-date-set.html>
- <https://www.bizjournals.com/baltimore/news/2023/07/13/harborplace-mbc-closing-baltimore-design-team.html>
- <https://www.bizjournals.com/baltimore/news/2023/08/25/matriarch-coffee-shop-harborplace-mcb-deal.html>
- <https://www.bizjournals.com/baltimore/news/2023/09/12/downtown-partnership-boost-program-harborplace.html>





For your files...

-Eric

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**From:** beverley garrison <cinnamongirl21225@yahoo.com>

**Sent:** Sunday, February 11, 2024 2:24 PM

**To:** Tiso, Eric (DOP) <Eric.Tiso@baltimorecity.gov>

**Subject:** Bill 23-0448

CAUTION: This email originated from outside of Baltimore City IT Network Systems.

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Hello.. My name is Beverley Biddinger.. I reside at 600 Light Street The Christ Church Harbor Apartments for seniors.. I am writing to oppose the bills that would let Bramble and associates to build high rise apartments and office building and sail structure in our treasured gem which is the inner harbor.. Harborplace.. our public park should always remain a public park and never have developers build privatized buildings on the water .. we as a city can do better .. for the people of Baltimore and tourist.. I feel if this went to pass it would be devastating for our communities .. they could build so many tall buildings we would not have room for families and tourists to enjoy the water ..we need fun family friendly activities at harborplace.. what's wrong with refurbishing what we have to achieve that.. this is all I have to say as a senior citizen who's lived in Baltimore all of my 69 years thank you.. sincerely  
Beverley Delores Biddinger

## RE: Harborplace legislation: Testimony

Costello, Eric (City Council) <Eric.Costello@baltimorecity.gov>

Mon 2/12/2024 11:17 AM

To: Jane Seebold <jaseebold@gmail.com>; Testimony <Testimony@baltimorecity.gov>

Cc: Leva, Anthony F (City Council) <anthony.leva@baltimorecity.gov>

Tony, would you please ensure this is added to the bill file for all three bills? Thanks, EC

Eric T. Costello

Baltimore City Council, 11th District

527 City Hall

100 N. Holliday Street

Baltimore, MD 21202

(443) 813-1457 (mobile)

(410) 396-4816 (office)

[eric.costello@baltimorecity.gov](mailto:eric.costello@baltimorecity.gov)

[Twitter](#) | [Facebook](#)

---

**From:** Costello, Eric (City Council)

**Sent:** Monday, February 12, 2024 11:17 AM

**To:** 'Jane Seebold' <jaseebold@gmail.com>; Testimony <Testimony@baltimorecity.gov>

**Subject:** RE: Harborplace legislation: Testimony

Jane, in receipt, thank you. -EC

Eric T. Costello

Baltimore City Council, 11th District

527 City Hall

100 N. Holliday Street

Baltimore, MD 21202

(443) 813-1457 (mobile)

(410) 396-4816 (office)

[eric.costello@baltimorecity.gov](mailto:eric.costello@baltimorecity.gov)

[Twitter](#) | [Facebook](#)

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**From:** Jane Seebold <jaseebold@gmail.com>

**Sent:** Monday, February 12, 2024 11:13 AM

**To:** Testimony <Testimony@baltimorecity.gov>

**Cc:** Costello, Eric (City Council) <Eric.Costello@baltimorecity.gov>

**Subject:** Harborplace legislation: Testimony

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23-0444 Charter Amendment

23-0446 Inner Harbor Subdistrict Amendment

23-0448 Inner Harbor Project I Amendment

Hello,

I would like to express strong support for the above amendments specifically and the Harborplace project overall as proposed by MCB Real Estate. I have lived in the Federal Hill South neighborhood for 17 years, and I spend a considerable amount of time in and around the Inner Harbor. I think the proposed plans are very exciting and will bring life and joy back to the waterfront, attracting residents and visitors alike.

From the expanded park area to the two-level promenade to the elegant and unique sail building, the proposed Harborplace has many great features. I am also a fan of adding 900 apartments to the site and think two tall towers is the way to do it. As we learned from the Ritz Carlton development on the south side of the harbor, building on a wide and long footprint versus a narrow and high one significantly reduces water views. As someone who walks through the Inner Harbor frequently, I like the idea of people living there, creating energy and supporting small businesses.

The project also dovetails nicely with the improved Rash Field Park, the popular West Shore Park, and the soon-to-come Blueway to create a truly amazing urban waterfront experience. Let's do this, Baltimore!

Thank you for your time.

Jane Seebold  
111 East Clement Street  
Baltimore MD 21230  
[jaseebold@gmail.com](mailto:jaseebold@gmail.com)

Baltimore City Council  
Economic and Community Development Committee  
Baltimore City  
Baltimore, Md 21202

February 12, 2024

Dear Council Members

I oppose the current development plan for Harborplace for many reasons.

- Adding housing to the allowed zoning for the site will privatize an area that should be maintained as public use space for all residents of the City and beyond.
- Adding a floating promenade will add to routine maintenance and be unwise at a time when the world is worried about sea rise due to global warming.
- The cost of changing the traffic patterns at Pratt and Light seems an unnecessary use of our public funds

As a very long time resident of Baltimore, I see the area as a mostly open place that focuses on celebrating Baltimore and its people and history, where people can take a break, be inspired and energized. It should be looked at like our "Central Park". I hope we can start again and solicit ideas from many talented designers.

Sincerely yours,

Carolyn Boitnott

Cc Councilwoman Ramos

The Inner Harbor should definitely have height restrictions on buildings, and focus on making public spaces that are able to be enjoyed by all, instead of buildings that can only be enjoyed by the select wealthy few. Baltimore needs more public spaces, and the creation of these has been celebrated and welcomed, such as Rash Field by the Inner Harbor. If we focus on having more places that can be enjoyed by everyone, the city will flourish and crime rates will go down. The creation of new skyscrapers will not have this effect. Furthermore, the water views that people already have should not be closed off. The Inner Harbor is meant to be a place for everyone to enjoy. There should be height restrictions for buildings in the Inner Harbor.

Maria Novitskaya

## Baltimore's Inner Harbor Waterfront and Harborplace

As a native Baltimorean and former tenant of the World Trade Center Baltimore from 1977-1988, I became aware of the inconvenience of being across the street from available parking. I am well acquainted with the first campaign to build Harborplace, and the need for its amenities, which I long enjoyed. I am also aware that any surplus parking that may be available today, which for the most part is privately owned, will likely be fully absorbed as the recovery from Covid continues, and office occupancy rates are restored. The core importance of Pratt and Light Streets for vehicular traffic, and the undisclosed replacement plans that may be under consideration to replace traffic lane capacities that may be reduced by preliminary LRT or BRT plans on Pratt and Lombard Streets recently promoted by MTA Maryland also need to be considered. And, most importantly, U.S. Department of HUD and other federal funds were used to plan and build the Inner Harbor Urban Renewal project's infrastructure with great thought and care via a well-organized and implemented planning process which should not be brushed aside by a city administration desperate for quick fixes for the area's problems.

The difference between individual project economics (i.e., what makes the project financeable and sustainable), and what the economic externalities of a project might be have been insufficiently considered. Harborplace would not have been built without the substantial value that it added to the target Inner Harbor area and beyond. Management of Harborplace involved management of many elements of the Inner Harbor project, as well as entertainment elements of the Inner Harbor Park and Harborplace facilities, both of which were originally managed by Charles Center Inner Harbor Management with special focus. That focus no longer exists and MCB does not exemplify the sort of management depth that is needed once construction is completed.

Perhaps our most necessary first step, as citizens, is to inventory what we know, and what we need to know in order to provide the sort of analysis we need in order to make informed recommendations to the City of Baltimore. It is also necessary for us to identify any evidence of misinformation and possible corruption in the process to set forth the city's policies vis-à-vis Harborplace and the Inner Harbor. The Bramble project was presented before objectives and policies were developed to identify what would be truly helpful to existing property owners and investors in the Inner Harbor area, what would be a net benefit to the City of Baltimore and the region, and what considerations should be understood beginning with the possible reuse of the existing Harborplace entitlements and leasehold provisions. Bramble failed to adequately convince many of us that Harborplace is unworkable in anything close to its existing scale and mass, except for their statements the Harborplace is an outdated concept which is both obsolete and inefficient. The Inner Harbor shoreline is among the most critical public domains existing in Baltimore City and should not be abandoned by the city to a purchaser of the leasehold without having first considered preserving the health of the entire Inner Harbor real estate community. The city should not further a policy of bailing out speculative purchasers or developers who overpaid for properties restricted by existing covenants and zoning, and then being compelled to add \$500 million in public funds to make the purchasers' speculative bid

profitable. Too many expensive and long-lasting errors occur when public agencies, appearing desperate, throw more public money at projects bearing little resemblance to existing or emerging urban plans.

Very few cities have escaped the economic damages that were inflicted by Covid and Baltimore was no exception. The overall well-being of the Inner Harbor area must be considered carefully. Even in its current state, the existing Harborplace Pavilions have utility. More appropriate uses of existing structures across Light and Pratt Streets from Harborplace should be considered first, before view-obstructing buildings are approved along the waterfront.

Baltimore's waterfront is a major beneficial amenity as it exists. Many of the problems confronting the Inner Harbor and Harborplace, such as crime and the resulting impediments to visitation and business location, have more to do with the management of the city and its public security than the pandemic alone. The Ashkenazy ownership and management of Harborplace, in addition to not being up to its tasks, likely also suffered from the city's failures in public security and Inner Harbor Management.

There is far more to discuss in the examination of the best options for Baltimore's Inner Harbor. The city's relinquishing control of the beloved Inner Harbor Waterfront to the highest bidder is not any more desirable than would be a sale of parts of Patterson Park, Druid Hill Park, Lake Roland and other beloved parklands in Baltimore City and the region.

## Baltimore's Inner Harbor Waterfront and Harborplace

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I oppose this legislation intended to transform the landscape of the Inner Harbor, allowing for tall residential buildings that would block out sun at the harbor and obstruct the view for so many now benefiting from the stupendously beautiful waterfront. I agree with the video testimonies made by Anirban Basu and Carl Stokes on the Inner Harbor Coalition's YouTube channel and would urge everyone to watch those videos as well as others on the channel. Mr. Basu's satirical and blistering critique of the process makes clear that the vision behind this legislation is not the vision of the people of Baltimore city nor conceivably of those who participated in the focus groups. Mr. Stokes makes the vitally important point of the public nature of the Inner Harbor. He refers to it as a public square. One could also call it a public park, but what is important is the term and concept, Public. Public spaces are to be enjoyed by the public. And as Mr. Stokes pointed out, the Inner Harbor is a space currently being immensely enjoyed by the public, by people from all over the city, country, and world. Anyone who visits Baltimore goes to the Inner Harbor, and there are also many Baltimoreans who enjoy this precious site. I frequently walk along the Inner Harbor and enjoy seeing families and others leisurely taking in the tremendous views, teens showing off their skills at the skateboard board park, children screaming at the playground. I don't necessarily love the bicyclists who zoom by me too fast or a few other aspects, but overall, I love the Inner Harbor. My heart sinks at the thought of it being used to build high rises that would destroy the charm and splendor of the Harbor. As others have noted, quite a bit has been done to invest in the Harbor, the upgrading of Rash Field by the city is one great example. Much more can be done. And with the proper process, I'm sure the city can bring more commerce to the area, commerce that serves the people, as was the original vision of this unique venue. Thank you for this opportunity to comment

I oppose this legislation intended to transform the landscape of the Inner Harbor, allowing for tall residential buildings that would block out sun at the harbor and obstruct the view for so many now benefiting from the stupendously beautiful waterfront. I agree with the video testimonies made by Anirban Basu and Carl Stokes on the Inner Harbor Coalition's YouTube channel and would urge everyone to watch those videos as well as others on the channel. Mr. Basu's satirical and blistering critique of the process makes clear that the vision behind this legislation is not the vision of the people of Baltimore city nor conceivably of those who participated in the focus groups. Mr. Stokes makes the vitally important point of the public nature of the Inner Harbor. He refers to it as a public square. One could also call it a public park, but what is important is the term and concept, Public. Public spaces are to be enjoyed by the public. And as Mr. Stokes pointed out, the Inner Harbor is a space currently being immensely enjoyed by the public, by people from all over the city, country, and world. Anyone who visits Baltimore goes to the Inner Harbor, and there are also many Baltimoreans who enjoy this precious site. I frequently walk along the Inner Harbor and enjoy seeing families and others leisurely taking in the tremendous views, teens showing off their skills at the skateboard board park, children screaming at the playground. I don't necessarily love the bicyclists who zoom by me too fast or a few other aspects, but overall, I love the Inner Harbor. My heart sinks at the thought of it being used to build high rises that would destroy the charm and splendor of the Harbor. As others have noted, quite a bit has been done to invest in the Harbor, the upgrading of Rash Field by the city is one great example. Much more can be done. And with the proper process, I'm sure the city can bring more commerce to the area, commerce that serves the people, as was the original vision of this unique venue. Thank you for this opportunity to comment

Hi Bill,

I respectfully disagree regarding your take on the proposed Inner Harbor redevelopment plan. In short, it is too heavy on tall, upscale residential. While increased residential downtown is generally a good thing, there is an ample amount of it already which is upscale in nature (see: Key Highway, Harbor East, Harbor Point and even the East Side of Fells Point). Already much of the Canton waterfront is blocked to public view (though thankfully not public access thanks to the Promenade) by large residential developments.

Taking up one of the few somewhat "open" spaces around the harbor with more of the same is extremely short-sighted, especially for such a hallowed Baltimore public gathering space. The former Harborplace land should remain a public, park-like area which can be used for events such as Christmas Village, Wine Village, tall ship visits, fireworks, etc. Indeed, we should be bringing back some of the former festival spots around the Inner Harbor which have been lost to Timonium Fairgrounds, a dreadful suburban venue that few city residents ever attend. Any residential included (and I do agree there should be some) should be relatively low-rise and used to supplement the public spaces, not take away from them.

Also, any proposals I've seen regarding re-use of McKeldin Square seem to be about the same: fill it up with more buildings. Why exactly the relatively stylish and functional fountain there was summarily destroyed by the city without anything of value taking its place is still unclear to me. It seems a knee-jerk reaction to ridding the space of homeless people perhaps. That square should likewise be replanted with trees (likewise cut down by the city and never replaced for the ill-fated Grand Prix races) and redeveloped into some semblance of its former self as a public space.

I therefore urge you to reconsider your opinion on this redevelopment and join the thousands of city residents who will oppose it on the upcoming ballot referendum.

Thanks for reading.

Best Wishes,

Steve Andrews

I live in Federal Hill and have had a small business downtown for 20 years. I have walked across the Inner Harbor over 7500 times. I have seen Harborplace at its best and its worst, but one thing is undeniable: it is the heart and soul of Baltimore.

The 2015 uprising, crime, Covid, gross mismanagement, the exodus from the traditional office, the demise of many retail models have all had their effect on Harborplace. Now it needs a lift.

I grew up on the west side of lower Manhattan near the Hudson River. Decades ago, it was a bleak, decrepit, industrial area not yet in transition.

And then in the 1990s, something truly magical happened.

A New York State public benefit corporation was formed to design and build a waterfront park from the Battery to midtown. The Hudson River Park opened in 1998.

The neighborhoods across from this park exploded with development. The popular retail and entertainment district we know as the Meatpacking district was born. Movie stars were moving in next to, low rise, subsidized housing projects. Michelin star restaurants began popping up.

BY 2015 the Hudson River Park had 17 million annual visitors.

Then in 2009, an old abandoned elevated freight train line that ran through the neighborhood was renovated into The Highline. 10 years later it had 8 million annual visitors. 8 MILLION VISITORS! A reimagined elevated freight train line. NOT retail. NOT restaurants. NOT office buildings. NOT high rise apartment towers. Just a nice place to walk a little bit closer to the sky.

It all worked. It activated not just my neighborhood but the whole city.

In contrast, as a New Yorker, I can tell you: high rise apartment building neighborhoods are absolute dead zones.

Yes, preserving open public spaces, parks and promenades would work pretty well to activate Baltimore's Inner Harbor. People love to stroll, and attend kid friendly events and festivals such as Light City Baltimore, the Baltimore Book Festival or especially visiting Tall Ships. If you want to talk equity, visiting the Inner Harbor is free of charge and a great alternative if spending \$200 for a family of 4 just for tickets and a stuffed dolphin at the Aquarium isn't your thing.

Public spaces also transcend fluctuations in the real estate market, the economy, and even pandemics, civil unrest and natural disasters. They are timeless. If you preserve the public nature of Harborplace the surrounding areas of downtown and South Baltimore will thrive. "Less is more" seems to be a time proven adage. High rise residential and office towers are NOT public spaces.

Sometimes Baltimore makes mistakes. Old Town Mall comes to mind. I am sure that in just a few years we will look back at this Harborplace Plan, if it is built, and realize that we had just made a \$1billion preventable, horrible mistake, because as a city, we had not done our due diligence. We went with the only option presented to us.

The citizens of Baltimore, not developers, should making these decisions. How can we allow developers to write legislation that only benefits their misguided, for profit project, sold to the public with self serving “public engagement reports,” false narratives and eye candy renderings. Baltimore does not need another international public embarrassment.

We need to take a pause, and seriously explore other ideas, simpler ideas, lower cost ideas that will give the citizens’ of Baltimore a large return on investment and keep the Inner Harbor and Harborplace the iconic heart and soul of Baltimore. It is time to stand up. I urge you, don’t sell our soul.

**Robert A. Manekin**  
**500 E. Pratt Street - Suite 1250**  
**Baltimore, MD 21202**

February 12, 2023

Vice President Sharon Green Middleton  
Chair, Economic and Community Development Committee  
City Hall  
100 Holliday Street, Fourth Floor  
Baltimore, Maryland 21202

Dear Chair Middleton,

Since its opening July 2, 1980, Harborplace has been the heart of Baltimore's Central Business District (CBD). Forty-four years later, after four major recessions, urban unrest, and a global pandemic, that heart needs a transplant if the CBD is to have a pulse. Understanding the precarious nature of the commercial office building industry in the country in general, and downtown Baltimore in particular, and recognizing the ongoing decline in the commercial tax base downtown, Harborplace needs to be redeveloped into the one real estate asset class that has the potential to succeed – mixed-use, including residential.

I have watched downtown Baltimore evolve since 1961. That is when the Morgan State marching band led a parade for the topping off ceremony for One Charles Center, the first building in the Charles Center Redevelopment project (I was 12 years old at the time). Since then, I have observed the construction of Charles Center, the Inner Harbor, Harbor East, Harbor Point, Locust Point and Port Covington. These projects replaced deteriorating buildings, toxic brownfields sites, and functionally obsolete structures. At first, I was merely an observer. After joining my family's real estate business in 1977, I became a participant. Today, after 46 years in commercial real estate, the overwhelming majority of which has been spent in downtown Baltimore, I have concluded that the redevelopment of Harborplace is critical to the economic viability of the Central Business District and, as a result, downtown Baltimore.

Your committee is tasked with considering what the redevelopment of Harborplace should be from a legislative and legal perspective. In furtherance of approving the legislation before you, please consider the following data as it relates to the health of Baltimore's office building industry:

1. Current vacancy rate (space not leased) is 20%
2. Current availability rate (space not leased and space to be vacated) is more than 30%
3. Assessments on existing office buildings are declining by more than 35%
4. Increasing foreclosures, short sales, and higher interest rates are going to cause more buildings to experience reduced values and pay less taxes
5. Return to work rates have stabilized at no more than 55%, causing office tenants to use and lease less space
6. Retail growth in the city has been experienced in Harbor East, Harbor Point, and Canton, where there is a greater density of residential users

7. Retail uses in the Central Business District have been challenged due to a reduced office population and lower resulting demand for ancillary services, e.g. food, shopping, banking, etc.
8. Downtown is Baltimore's fastest growing residential neighborhood with a projected need of over 5,000 units over the next five years.

This data points to the need for an infusion of residential development, and the proposed MCB redevelopment provides that infusion.

While you are considering the nature, density, and structure of the use, I respectfully suggest that it would be wise to consider the entity proposing the redevelopment – MCB.

Like Harborplace developer The Rouse Company, MCB is local to Baltimore. Like the Rouse Company, MCB has a significant number of projects and financial investments in Baltimore City. And these projects are not simply Class A, downtown, "glitz." MCB has redeveloped Old Northwood near Morgan State; is leading the redevelopment of Madison Park; and converted a toxic scrap yard on Eastern Avenue to Yard 56, a mixed-use project. In MCB, we have a local, best in class developer with the track record, skill set and financial backing to get the job done.

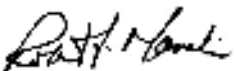
One other point.

There is a difference between the development of Harborplace in 1980 and its redevelopment today. In 1980, the public spaces and fields did not need to be developed. They served the public quite well and were a wonderful site for the City Fair. Creating Harborplace was a plus, not a necessity. And this plus became a magnet for tourism, office users and the City at large. Today, Harborplace is a negative. Sitting functionally obsolete it casts a pall over the entire CBD and encourages office and apartment users to relocate to Harbor Point, Harbor East, Canton, and Port Covington. The magnet that was once Harborplace will reverse polarity and expel, as opposed to attract, activity to the CBD without a fundamental change in use.

The MCB vision embraces that necessary change in use, while providing more public space than currently exists. This vision implements more view corridors to the Inner Harbor so pedestrians can see the water. And most of all, it provides residential density in the heart of the CBD, something badly needed due to the challenges being faced by the office industry. By enacting the legislation pending before your committee, you would commence the badly needed change and start the process of saving the Central Business District.

Thank you for giving me the opportunity to provide comment.

Respectfully,





**To: Eric Tiso**  
**From : Ted Rouse**  
**Re: HarborPlace Bills 0444, 0446 and 0448**  
**Date: 12/19/23**

**Testimony by Ted Rouse before the Balt City Planning Commission on 12/21/23**

**I am against the proposed land use changes in Bills 0444, 0446, and 0448**

**Design and Land Use Are Inextricably entwined. The cart is before the horse.**

The current bills under consideration today should only be considered after UDARP has finished its review of the proposed design and after the Planning Commission has considered whether the proposed design has the potential to draw large crowds back to the inner harbor. Currently the only place for the public to give advice to city government on the Developer's design appears to be at the Planning Commission hearings. The design proposed by the development team necessitates changes to land use rules that are 50 years old. The Planning Commission members need to drastically slow down the review process and give more consideration to the design that is being proposed. I request that the Planning Commission defers action on these Bills until UDARP completes its work with the Developer to refine the plans for Harbor Place.

**I applaud developer David Bramble's boldness of vision.** I believe [\\$500 million of private investment](#) in the Harborplace site is extremely exciting. I believe residential density, such as 900 apartments, could be a very good thing for the Inner Harbor. As urbanist Jane Jacobs says, "There is nothing like the hustle and bustle of human activity to create a safe environment." **But**, I believe the MCB plan is flawed and will fail to consistently bring large groups of demographically mixed people to enjoy our city's greatest urban asset which is our unique presence on the Chesapeake Bay. If high rise apartment towers are needed for the economics of the site, the towers should be close to the realigned Light Street corridor and the towers need to be skinnier. The revised land use provisions the planning commission approves should include a maximum foot print for individual high rises and a high rise zone of not more than 70' east of the revised Light Street corridor. The planning commission should give thought to the possibility that the developer's desired 900 unit density could be achieved in buildings not higher than 100' (per current height limits) and that no buildings in excess of that height should be allowed in this area which has Federal Hill's height and the Constellation's sail height as existing natural markers. Most important, no residential buildings should be allowed unless the project plan includes a minimum of 50,000

square feet of waterfront restaurant space with waterfrontage no further than 60' from the water's edge.

**The water is where the magic is.** It's a natural magnet, let's capitalize on it. In particular, the 60 feet between buildings fronting the waterfront and the water's edge is where people want to be. Emphasis should not be on non-waterfront parks further than 60 feet from the water or on view corridors for cars passing by. The emphasis should be on the space between the buildings and the water. The Wharf, a modern real estate development on D.C.'s southeast waterfront, is a great example of how that 60 feet can become magical when there are varied seating options and gathering places, and varied uses such as restaurants, shops, fountains, residential buildings and hotels. There are many European waterfront cities that line their waterfront with restaurants. We need a critical mass of destination locations along our water's edge. That might mean at least 12 restaurants, two hotels, three fountains that kids can jump in and out of, and one or more performance venues. Residential towers by themselves won't activate the waterfront. Bringing lots of people to the inner harbor waterfront 365 days a year should be our Number One Goal in redeveloping Harborplace.

The concept of New Urbanism revealed that so called "public private space" was an essential characteristic of successful small American towns. That space is often found on the front porches of houses that abut public sidewalks. In a similar way, waterfront restaurants would provide that space to Baltimore's beloved inner harbor promenade. A critical mass of such public private space in the subject properties should be required by any new land use provisions. I request that the Planning Commission votes to require a minimum of 50,000 sf of restaurant use within 60' of the water's edge.

**We need to minimize the amount of public subsidy needed.** Does the promenade really need to be replaced now with \$400 million of public money? It may be possible to do bulkhead repairs where necessary for far less dollars that will last at least 10 years to give us time to find infrastructure money for larger repairs.

**We need an updated master plan** that has thought given to how we can continually improve the Inner Harbor experience over the next 20 years. I believe a people mover, such as a Gondola or a Monorail, to move people from the stadiums and convention center to Harborplace should be included in a master plan. A bridge that would give residents and visitors an opportunity to circumnavigate the Inner Harbor on foot and/or bicycle within 30 minutes should be part of that plan. I love Visionary Art Museum founder Rebecca Hoffberger's idea of filling sidewalks with quotations of great Baltimoreans and Marylanders like Billie Holiday, Babe Ruth, Frederick Douglass, James Rouse (my father) and many others.

We need a city government empowered, quasi nonprofit whose sole mission is focusing on how to implement an Inner Harbor master plan and the best urban waterfront ideas from around the world. We had such an organization, Charles Center Inner Harbor management, from 1965 to 1985. CCIH caused the Science Center, The Hyatt Hotel, Harborplace, National Aquarium, Convention Center and our Stadiums to be built. We need to reauthorize it for 2023 to 2043 and maybe beyond.

*Ted Rouse ([ted@heal-thy-planet.com](mailto:ted@heal-thy-planet.com)) is president of Healthy Planet LLC, an urban real estate development company working to restore historic buildings in neighborhoods with substantial vacancy. Waterfront properties he developed while a partner at Struever Bros Eccles and Rouse for 25 years include Tindoco Wharf and Canton Cove. Rouse also was chair of the Baltimore Harbor Endowment, which promoted completion of the 7.5 mile waterfront promenade, and chair of the American Visionary Art Museum during its expansion to include the Jim Rouse Visionary Center.*

11 February, 2024

Architecture

Urban Design

Planning

Re: City of Baltimore, Baltimore City Council  
Economic and Community Development Hearing Tuesday 13, 2024  
**23-0448 Urban Renewal – Inner Harbor Project 1, Amendment 21 and related bills 0446 and 0444.**

### **Testimony: In Opposition to all three bills**

HarborPlace is designated as a public park with limited low commercial uses that serve the public visiting the harbor. The proposed amendments are tailored to allow a specific design that has been proposed by a specific developer. This design has not been vetted for practicality, for its cost-benefits ratio, and for fitting in the overall context of downtown Baltimore or the MasterPlan Inner Harbor 2.0. Nor have these incentives (easing regulations and predevelopment money) been offered to any other potentially interested developers who may have wanted to buy the pavilions if this option would have been available. No reports in support of the proposed design configuration are provided by any agency. There is no good rationale to allow 2-4 million square feet of for-profit office and residential development of unlimited height within the space designated as public space. The suggested amendments violate the original masterplan concept in which the outer frame of buildings on the far side of Pratt and Light Street define the spatial impression (for example when looking down from Federal Hill Park). A line of tall buildings will move the frame effectively by 200' or so closer towards the water's edge, effectively reducing the area perceived as HarborPlace, even if the overall footprint of the buildings does not increase compared to what is there now. The 2-4 million square feet are arbitrary and capricious and not based on good planning. No justification has been provided for these figures.

### **For the above reasons I am specifically opposed to:**

Section 1 (2), V-B: Size of facilities no less than 2 million sf and no more than 4,000 sf and allowing parking NO MORE THAN 4,000 SF ????

Development Area 13: Opposed to adding residential use, changing maximum allowable height from 50' to underlying zoning, allowing vehicular traffic, allowing parking of any kind

Development Area 14: Opposed to relaxing building construction of any kind

Development Area 15A: Opposed to allowing residential use, changing maximum allowable height from 50' to underlying zoning, allowing vehicular access, allowing parking.

**Testimony from Liz Bement**

**Bill 23-0448 Urban Renewal-Inner Harbor Project 1-Amendment 21**

**Zoning - C-5-IH Inner Harbor Subdistrict – Amendment**

**Charter Amendment - Inner Harbor Park**

**OPPOSE**

Dear President Mosby and Members of the City Council,

I oppose the Urban Renewal, Zoning and Charter amendments listed above . The entire process has lacked transparency and has kept residents in the dark about why one developer has been chosen and given unfettered rights to Baltimore’s most precious public space. The developer has claimed to have held public input meetings, but many in attendance at such meetings say that residential towers were never mentioned in these meetings, let alone requested or supported by attendees.

By his own admission, Mayor Scott had chosen MCB Real Estate to build this project when he first took office and kept it under wraps until the plan was unveiled late last year. Again, this demonstrates a total lack of transparency and public input into this decision.

We need a thoughtfully crafted, independent Master Plan for the Inner Harbor and an international design competition based on that plan for this project to move forward—our city deserves nothing less than this.

Of all the Baltimore residents I have spoken with since this plan was unveiled, including architects, builders, developers, preservationists, and people who live close to the harbor, not one person thinks that this current plan--including doing away with the height limits, building residential towers and on-site parking--is a good idea.

Our politicians should not be choosing favoritism and cronyism for their friends who make large campaign contributions over the will of the people of Baltimore.

This is an incredibly important project with long-term ramifications. Shame on the politicians who are trying to ram this plan down our collective throats. Our city deserves So. Much. Better.

Liz Bement

Upper Fell’s Point

## Testimony of E. Evans Paull, City Council Bills, 23-0444, 23-0446, 23-0448, February 13, 2024

Honorable Members of the Baltimore City Council:

To introduce myself, I am Evans Paull, long time city planner, now retired. In my career I worked for 30 years in various Baltimore planning and development capacities; then worked another 15 years at the national level, primarily specializing in brownfields and similarly challenged urban redevelopment projects. I have been the recipient of six awards, including the national Phoenix Award for brownfields redevelopment. My work has been published in six national professional journals and one university-gearred book.

After retiring I authored an historical account of Baltimore's Road Wars, *Stop the Road, Stories from the Trenches of Baltimore's Road Wars* (Boyle and Dalton, September 2022).<sup>\*</sup> The book has been very well received, including winning two awards (Baltimore City Historical Society and Baltimore Heritage).

I am testifying today in support of MCB's plans for Harborplace, at least in concept if not the specific design. The main point is a fairly simple one: if we want downtown and the Inner Harbor to be the heartbeat of the region, to be a vibrant place for all to enjoy, it's going to take a dramatic change. And that change is going to involve some density and some loss of parkland. The old charter restrictions with limited development worked for a period of time largely because of tourism, but tourism is fickle and extremely seasonal; so, it proved to be unsustainable. The MCB plan is based on the sound theory that mixed use, density, and 24-hour presence are the keys to revival.

An Inner Harbor revival will have enormous secondary benefits, boosting all of downtown, as well as the stadium area, making the entire district more desirable for live-work-play.

My comments above are purposely general – I am not supporting the specific MCB design plan. I would urge consideration of the following:

- A more collaborative and public process to determine an acceptable plan and design;
- A strongly worded guideline or requirement for the retail businesses to be primarily home grown, not the all-too-familiar national chains; and,
- Narrowing Light Street so that some of the envisioned development can be moved further from the waterfront and the Promenade.

Lastly, I want to support a complimentary use of some of the remaining parkland, using it for a tented beer emporium and events space, capitalizing on the number one trend in entertainment: the emergence of direct sale breweries as gathering places for families, friends, tourists, and locals. This "Maryland Spirit Tent" would be a permanent tented facility, open air in the warm months, and enclosed in the winter months. Featuring local and Maryland breweries, the tent should double as an event space, with constantly-changing art shows, concerts, food festivals, etc., all featuring local talent. I have attached a more detailed description of the concept.

My contact information:

[evpaull@comcast.net](mailto:evpaull@comcast.net); 202-329-4282

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<sup>\*</sup> <https://stop-the-road.com/the-book/>

# Can the brewery craze help revive Baltimore's Inner Harbor?

E. Evans Paull

It's the new BFFDD—beer, family, friends, dates, and dogs. The astonishing growth of small breweries that sell directly to customers, thereby enlivening a variety of indoor and outdoor spaces, is perhaps the single biggest trend in Baltimore area dining and entertainment over the last decade. Young people, many with children in tow, flock to these breweries for convivial times with their BFFDDs.

It is my contention that this trend presents an opportunity for Baltimore's Inner Harbor—that the place where Maryland's brewers should showcase their wares should be at Baltimore's waterfront center point.

Many observers have commented that the Inner Harbor, even when its star was shining most brightly, was always plagued by the extreme seasonality of tourism. Most agree that revitalization should be more geared to attracting locals, with special attention to the now considerable number of downtown residents. The need is for an all-weather attraction with local/regional appeal.

An all-weather tented facility, with a changing array of Baltimore and Maryland breweries\* acting as the anchor, would be just the kind of attractor that would re-establish the Inner Harbor as a year-round celebratory gathering place for the Baltimore region. The tent sides could be down to envelop the heat in the winter and open air in spring-summer-fall. The breweries could change every month or every couple months, keeping it fresh.

Sections of the tent could be devoted to displaying the work of Maryland artists and artisans (again, changing periodically) and a stage could be used for live music performances. An adjacent open-air plaza area should be a flexible space for fair-weather adjunct activities: a special art show one week, additional concert seating the next. Street performers would help enliven the area and make it just-plain-fun, while also distinguishing the Inner Harbor from the non-downtown breweries. A small playground would add to the appeal for young families.

As to the location, my thought is on the West Shore at the site of what is now a temporary winter attraction: the Christmas Village, modeled after the traditional Christmas Markets in Germany.

The following is my effort to refine the concept:

**Prepared Food.** The magical synergy of this proposal is that the breweries will generate business for restaurants in Harborplace. The reason is the breweries do not need to make money selling food – many current direct-sale breweries bring in food trucks to provide food, but that won't be necessary at the Inner Harbor. The brewers' clientele will naturally spill over into Harborplace restaurants.

**Legal Restrictions.** The Baltimore City Charter designates the vast majority of Inner Harbor I as "parkland" and restricts "commercial uses" to the few acres where Harborplace located. A liberal interpretation would

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\* Local vineyards and distillers could be added to the mix, but my observation is that home-grown breweries are the stronger attraction.

include the brewers' tent as parkland because it is not a permanent structure, would be open air most of the year, and the brewers could be viewed as park vendors under some kind of public or non-profit (rather than "commercial") organizational structure. A 2016 charter amendment allowing outdoor cafes could be helpful. The precedent of the Christmas Market should help pave the way.

**Name it the Maryland Spirit Tent.** I nominate "the Maryland Spirit Tent," the term "spirit," an intentional double-entendre suggesting fun fueled by alcoholic beverages; the "Maryland" qualifier simply defines all that fun as home-grown, generated by Maryland brewers, artists, musicians, street performers, and possibly winemakers and distillers.

There are now 42,000 people living in the downtown area, with many thousands more living in Fells Point and Federal Hill, all within walking distance (no need for parking!!!). Is there anything more perfect than a beer tent to bring them to the Inner Harbor? They will make coming to the Inner Harbor "cool" again.

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E. Evans Paull is the author of *Stop the Road, Stories from the Trenches of Baltimore's Road Wars* (Boyle and Dalton, September 2022). You can follow the book at [www.stop-the-road.com](http://www.stop-the-road.com) or <https://www.facebook.com/Baltimore-Road-Wars-1940-1980-109994791288651>. Paull is a retired city planner, most recently serving as the Principal of the consulting business, [Redevelopment Economics](#). Former posts include stints with the Baltimore City Department of Planning and Baltimore Development Corporation.