



Subject: *Testimony for Council Bill 45-2026*

To: *Brandee Ganz
Chief Administrative Officer*

From: *Kelly Cimino, Director – K. Cimino
Department of Housing and Community Development*

Date: *June 15, 2026*

Review of CB45-2026:

The County Council is currently considering action on CB45-2026, legislation which would require the Director of the Department of Housing & Community Development (DHCD) to include annual reporting of the student generation yields of each housing development that has been approved for a Payment in Lieu of Taxes (PILOT) agreement. If passed, CB45-2026 requires that this reporting of student generation yields be included in the Annual Analysis of Moderate Income Housing programs prepared by DHCD.

After reviewing the legislation, DHCD would like to share several comments and concerns on the legislation as drafted. First, it is worth noting that projects approved for PILOT agreements are generally Low Income Housing Tax Credit (LIHTC) developments, not MIHU communities. As a result, this MIHU report has not historically included information on PILOT recipients or LIHTC communities.

While DHCD supports and encourages the transparent reporting of data and information, DHCD does not collect or maintain access to student generation data for specific developments. This data is tracked, collected, and reported by the Howard County Public School System (HCPSS). When generating projected student yields for PILOT requests, the Howard County Department of Planning and Zoning (DPZ) receives data that is collected and provided by HCPSS. HCPSS is the only entity that collects student generation yield information.

DHCD can report student generation yield data for housing communities that receive PILOT agreements, to the extent that information is provided to DHCD by HCPSS. However, in the event that HCPSS does not provide the information, DHCD would not be able to include the data in its annual MIHU report.

Proposed Amendment:

Following our review of the legislation, DHCD recommends that CB45-2026 be amended to note that the Department will request from HCPSS an annual report detailing student yield generation for each housing community approved for a PILOT agreement. Potential amendment language is noted in red below:

(7) THE STUDENT GENERATION YIELDS FOR EACH RESIDENTIAL DEVELOPMENT THAT HAS ~~BEEN APPROVED FOR~~ A PAYMENT IN LIEU OF TAXES (PILOT) AGREEMENT, **TO THE EXTENT THAT THIS INFORMATION IS PROVIDED TO THE DIRECTOR BY THE HOWARD COUNTY PUBLIC SCHOOL SYSTEM;**

Thank you for your consideration of this testimony.