Comments on Dr. Gerrit-Jan Knaap’s Paper:

Using Incentives to Combat Sprawl
Maryland’s Evolving Approach to Smart Growth

Prepared for presentation at the Symposium

Planning for States and Nation-States:
A TransAtlantic Exploration

Dublin, Ireland
October 14-16, 2012

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1. Overview

This paper is a response to Dr. Knaap’s paper on Maryland’s smart growth (i.e., sustainable growth) efforts. My goal is to round-out the information and commentary that Dr. Knaap provides and to give a different perspective on some points. I respond to the paper as a planner, as Secretary of the Maryland Department of Planning since the beginning of the O’Malley Administration (January 2007), and having worked for the agency 15 years before that. My overall intention is to demonstrate how there are many established smart growth programs in place and the approach of the O’Malley Administration is to make the best use of those programs and to address several key gaps, all knitted together by a strategy: PlanMaryland.

Dr. Knaap’s paper covers significant ground summarizing Maryland’s overall smart growth issues, research, and history while focusing on PlanMaryland. It goes on to provide his comments on how these efforts have fared and prospects for the future. It represents a significant amount of work to assemble this information in one place and Dr. Knaap’s experience in Maryland and elsewhere gives him a perspective that is worth considering.

Maryland is well suited to be a smart growth state. It is densely populated, progressive, and diverse in its people, communities, and environment. The State is considered by many as “America in Miniature.” Issues ranging from saving the Chesapeake Bay, to revitalizing and repopulating Baltimore City, to protecting farmland, to managing fast growing suburbs make smart growth an important and perennial issue in Maryland. The State and its local governments have a long and rich history of planning as captured in Dr. Knaap’s paper. There are many (approximately 100) smart growth related programs across many State agencies, many of which have been in place for decades. It is in this context that we are essentially inserting a state development plan.

In a perfect world the plan would have been developed first and then the programs would have followed. This is not our reality. From the beginning the Plan’s initial focus was to provide a framework and strategy for existing State programs, and then to work with stakeholders to refine, improve, and further integrate this strategy with local and regional government efforts and other stakeholders. We also look to the planning effort to help identify gaps in our overall planning program. While Dr. Knaap’s paper touches on the issue, it is important to note the plan was developed during the toughest political climate in my 25 year career in planning. I think many of Dr. Knaap’s criticisms of the Plan stem from the fact that we had to develop a good, but less than perfect plan, under these circumstances and then insert it into an existing complex conglomeration of various programs across several State agencies. Given that the Plan was required in 1959 and never done until 2011, a strong case can be made for the wisdom of establishing a beachhead with a good plan and building from there. This was truly a case of not letting the perfect be the enemy of the good. The fact that the O’Malley Administration was simultaneously working on tough legislative initiatives to fill long known and documented holes in the State’s overall smart growth effort (e.g., The Sustainable Growth and Agricultural Preservation Act of 2012) amplifies this fact. Now that the initial plan is complete, the beachhead established, we need to further develop the implementation strategies and to build on the Plan.
2. PlanMaryland in the Context of Maryland’s Current Programs and Issues

Dr. Knapp’s paper summarizes much of Maryland’s rich planning history and related issues. However I would like to provide some context and highlight several key initiatives because of their importance in general to smart growth and because they are key programs within PlanMaryland. Please see the following link for an overview of Maryland’s planning history and milestones: http://planning.maryland.gov/OurWork/mdp50years.shtml

2.1. Priority Funding Areas - While the 1997 Smart Growth and Neighborhood Conservation Act is a very important part of Maryland’s planning history and it continues to be a vital part of the State’s overall planning program, assessments of the State’s overall planning efforts often overly focus on this initiative and minimize the role of several other key programs. As the paper points out on Page 2: “What made this approach so innovative and attractive was its reliance on incentives instead of regulation. The Priority Funding Area (PFA) legislation, the key part of the package, was easy for people to understand conceptually: State funding for development related projects would be limited to growth areas—i.e., PFAs. Therefore, many learned to consider development inside these areas as smart growth and development outside as rural sprawl. I strongly believe that one of the lasting benefits of the PFAs is to provide a clear, fairly consistently drawn map of growth areas across the State. While there are some exceptions, PFAs essentially represent areas Maryland where both State and local governments target growth. Prior to the PFAs it was not easy to get a Statewide picture of growth areas. For an interactive map of the PFAs see: http://mdpgis.mdp.state.md.us/pfa/ For more information of PFAs see: http://planning.maryland.gov/ourproducts/pfamap.shtml

The binary nature of tracking growth as it relates to the PFAs lends itself to analysis. MDP reports annually on the amount of growth in and out of the PFA. See the indicator and Smart Growth Report as part of the annual report documents: http://planning.maryland.gov/ourproducts/publications.shtml#annual Both Dr. Knaap’s paper and MDP’s annual reports (and other publications cited in the paper) document the growth trends relative to the PFAs, showing similar conclusions. The basic conclusion is that the share of growth locating outside of the PFAs has increased for some years since the law passed and has now leveled off. While impossible to prove, sprawl would have likely been worse without the PFAs. Overall the PFAs have served as a key component of Maryland’s smart growth program. The effectiveness of its incentive based approach was questioned by many at the program’s beginning. The following link is an article written by Douglass R. Porter in January 1999—a year and a half after the legislation was passed and several months after the legislation took effect: http://abell.org/pubsitems/arn199.pdf

Essentially the PFA law did what it was designed to do: direct development-related State funding to the PFAs. What drives many people’s criticism about it is their expectations that this law was going to stop rural sprawl. The PFA law was not designed to specifically tackle this issue. It is ironic that given Maryland’s long history of planning
that it was not until 2012 that the State took direct action to limit the most damaging form of development to smart growth and the Chesapeake Bay: large lot residential development on septic systems. This was done via the Maryland General Assembly passing Governor O’Malley’s Sustainable Growth and Agricultural Preservation Act (SB236). See section 2.8 below for a summary of this new law. I should note however three other efforts in this policy area:

- Maryland’s various land acquisition programs (easement and fee simple). See section 2.7 below for more information.
- 1984 Chesapeake Bay Critical Areas Act limits rural sprawl in a portion of the land affected by this program. This Act applies to tidal shoreline areas within 1,000 feet (300 meters) of mean high tide. For more information see: http://www.dnr.state.md.us/criticalarea/
- Maryland Growth and Chesapeake Bay Protection Act (AKA, The 2020 bill) was an unsuccessful piece of legislation in the 1991 Session of the General Assembly. It would have significantly limited sprawl and required growth areas to set a floor for development density. For more an article about the bill see: http://articles.baltimoresun.com/1991-03-24/news/1991083132_1_growth-management-growth-commission-rapid-growth/

2.2. Master Water and Sewer Plans - The creation and extension of water and sewerage systems and facilities in Maryland has been governed by state law and regulation since the 1970s. This is an import part of the State’s smart growth program. See Md. Code Ann., Environment Article, Title 9, Subtitle 5. Local jurisdictions are required to plan for these facilities by creating water and sewer plans that are approved by the Maryland Department of the Environment (MDE). The law requires local jurisdictions adopt a water and sewer plan (and any amendments to an existing plan) that are consistent with their local comprehensive plan. The Maryland Department of Planning then advises MDE on whether the plan or plan amendment is consistent with the comprehensive plan when MDE is determining whether to deny, approve, or approve with conditions the plan or plan amendments. This water and sewer planning law, which contains a comprehensive plan consistency requirement, is a backstop against unplanned development and the State has used its authority over these water and sewer plans to prevent development outside growth areas when the local governments have not adequately planned for that growth. For more information see: http://www.mdp.state.md.us/OurWork/WaterandSewage.shtml

2.3. Chesapeake and Coastal Bays Critical Areas Act – mentioned above, this law was passed in 1984 and slightly expanded in 2002 to also include lands draining to the Atlantic Ocean. This was the first time the State directly inserted itself into local planning and zoning issues, albeit it for roughly 10% of its land area. The Act establishes protective buffers to surface waters and other key environmental features, limits impervious surfaces in some instances, and imposes a 1 dwelling unit to 20 acres (8 hectares) development limit in areas that were rural at the time the Act passed. For more information see: http://www.dnr.state.md.us/criticalarea/geninfo/development_in_CAC.asp
2.4. Consistency Between Comprehensive Planning and Zoning: Economic Growth, Resource Protection, and Planning Act of 1992 and The Smart, Green, and Growing Act of 2009 – Dr. Knaap’s paper covers the basics of the 1992 Act and its role as providing a foundation for comprehensive plans. One of its key provisions requires consistency between local comprehensive plans and implementing ordinances such as zoning. The issue of the link between comprehensive plans and zoning was challenged in the courts during Governor Ehrlich’s Administration (2003 – 2007). The Ehrlich Administration did not get involved in the litigation (Trail vs. Terrapin Run). Basically the case was about a plaintiff suing over the approval of a planned unit development of 4,300 units, known as Terrapin Run, in a rural area of Allegany County that was zoned for agricultural and rural conservation and not planned for that level of development. The case worked through the lower courts and had just reached Maryland’s highest court early in the O’Malley Administration in spring of 2007. The Administration decided to enter an amicus brief supporting the plaintiffs in the case and arguing that other provisions of the law require ordinances to be consistent with the comprehensive plan. Regardless, in 2008 the Court decided to side with the development and handed down a decision that significantly weakened, if not eliminated, the link between the comprehensive plan and zoning ordinances that is required by the 1992 law by continuing to assert that comprehensive plans were merely a “guide” and “advisory only”. Realizing the importance of comprehensive plans Governor O’Malley introduced legislation in 2009 to reverse the Court’s decision, restate the consistency requirement, and to elaborate on the consistency requirement. See the following for more information: [http://planning.maryland.gov/pdf/ourwork/sgg/sgg3.pdf](http://planning.maryland.gov/pdf/ourwork/sgg/sgg3.pdf)

2.5. Office of Smart Growth – As Dr. Knaap’s paper points out on Page 8, this office was created in 2001—essentially the last year and one-half of the Glendening Administration. While there are many opinions about the Office across three administrations, I think the take home message is that all cabinet secretaries report to the Governor (the paper states that the Director of the Office of Smart Growth reports to the Governor) and therefore there needs to be coordination among the secretaries and staff of the Smart Growth Subcabinet’s agencies. In addition, the Governor’s Office and the Governor himself needs to be engaged and supportive of smart growth efforts in order for there to be progress.

2.6. Sustainable Communities Tax Credit – By seeking the advice of key stakeholders and strategically reviewing existing revitalization programs across several State agencies, the Smart Growth Subcabinet developed the idea for this tax credit as it considered the reauthorization of its precursor, the Heritage Structure Tax Credit. The Sustainable Communities Act of 2010 strengthens reinvestment and revitalization in Maryland's older communities by reinventing an existing rehabilitation tax credit and extending the life of the credit through 2014, simplifying the framework for designated target areas in the Community Legacy (CL) and Neighborhood BusinessWorks (NBW) program by creating "Sustainable Communities", establishing a new transportation focus on older communities, and enhancing the role of the Smart Growth Subcabinet (SGSC) in the revitalization of communities. The approached used here by the SGSC is part of what is intended for how PlanMaryland will work across State agencies. This tax credit leads to
historic restoration projects and adaptive reuses that are catalysts for community
revitalization in Maryland’s existing communities. This program is an example of how
Maryland revitalizes existing communities and further channels future growth to these
areas. This complements other targeted growth programs and works in tandem with
programs focused on preserving or limiting development in the rural areas. For more
information see: a program overview at:
http://planning.maryland.gov/OurWork/2010legislation.shtml and project awards and
credit details at the following two links:
http://planning.maryland.gov/yourpart/sustainablecommunities.shtml and
http://mht.maryland.gov/taxcredits.html

2.7. Land Preservation - Maryland has a long and successful land preservation history. Just
under 25% of Maryland’s land area is preserved. The State uses several preservation
programs for different purposes. Some focus on environmental protection and others
focus on agricultural land preservation. In addition, they both use easement and fee-
simple approaches for acquiring land. Over time these programs have improved their
orientation to smart growth goals and targeting efforts in terms of policy and in terms of
using GIS technology. Maryland’s land preservation programs have also focused more
on prioritizing programs and land purchases to areas that are not fragmented by
development, and to areas they are not as likely to be fragmented in the future, based on
growth analysis that looks at local smart growth tools including zoning. For more
information:

2.7.1. Agricultural Land Preservation Program 2006 legislation the advances see:
http://planning.maryland.gov/OurWork/hb1141hb2.shtml

2.7.2. Overview of land preservation programs, including a strategic plan and analysis
for these programs:
http://planning.maryland.gov/ourwork/analysisruralresourcelands.shtml

2.7.3. Website that includes the three key targeting tools (AgPrint, GreenPrint, and
GrowthPrint): http://www.agprint.maryland.gov/

2.8. Sustainable Growth and Agricultural Preservation Act (SB236) of 2012 - Dr. Knaap’s
paper and other reviews of Maryland’s smart growth efforts often include comments
about the lack of a program that directly limits low density sprawl development. This is
the most damaging form of development in terms of the costs of providing public
services, inefficient land use patterns, and polluting the State’s waters, especially the
Chesapeake Bay. With the exception of land acquisition programs, there was not a
program directly focused on rural sprawl until the Maryland General Assembly passed
Governor O’Malley’s Sustainable Growth and Agricultural Preservation Act. This law
builds on local governments’ plans and zoning, and limits the amount of development
that can be built on individual septic systems (AKA, on-site disposal systems). The Act
is important for helping to limit the amount of additional Nitrogen pollution entering
streams, rivers, and the Chesapeake Bay. In addition, it will limit the large lot
developments that fragment agricultural and forest land. This is important given that
95% of Maryland’s land area drains into the Chesapeake Bay, that a house on a septic
system pollutes 10 times more Nitrogen on average than a home on central sewer, and
that a house on a septic system consumes 8 times more land per household than one on
central sewer. While this legislation and its implementation have been controversial, we believe it will be a significant tool in limiting rural sprawl development. For more information see:


2.8.2. Implementation guidance: [http://planning.maryland.gov/OurWork/SB236Implementation.shtml](http://planning.maryland.gov/OurWork/SB236Implementation.shtml)

2.9. **Sustainable Growth Commission** – Maryland was the first state in the US to have a planning commission. Since it was first established in the 1930s the commission has come and gone over time. The current version of this body is the Sustainable Growth Commission. It was formed by legislation in the 2010 Session of the Maryland General Assembly. The previous version of the commission had tapered off over the years and sunset in 2002. From that time until the new commission was formed, it was clear there is a need for a body of stakeholders to work with MDP and others on smart growth issues. The new commission has a broad mission which is mostly focused on working with MDP, other State agencies, and various stakeholders (local government, development, agricultural, and environmental communities, etc.) to further smart growth policy, education, outreach, communication, and coordination. It has several workgroups, including the PlanMaryland Workgroup. This workgroup works closely with MDP on plan development, refinement, implementation, and outreach. The Commission is an important component of Maryland’s overall smart program and its creation is an example of the Administration’s efforts to move forward with smart growth using existing and new programs, and to fill in key gaps in the overall program. Having a body of stakeholders that meets regularly to help with this overall program is vital. For more information see: [http://www.mdp.state.md.us/YourPart/773/sustainableGrowthComm.shtml](http://www.mdp.state.md.us/YourPart/773/sustainableGrowthComm.shtml)

2.10. **Information** – In many ways MDP is an information agency and good information is critical for an issue such as smart growth at the state level. Key information-related efforts include:

2.10.1. State Data Center: [http://www.mdp.state.md.us/msdc/home.shtml](http://www.mdp.state.md.us/msdc/home.shtml)

2.10.2. Smart Growth Analysis: [http://www.mdp.state.md.us/OurWork/growthtrends.shtml](http://www.mdp.state.md.us/OurWork/growthtrends.shtml)

2.10.3. Smart Growth Indicators – while MDP has used indicators for some time, the Administration submitted legislation in the 2009 Session of the General Assembly to require the State and local governments to develop indicators and to work with the National Center for Smart Growth on this effort. For more information see: [http://planning.maryland.gov/ourwork/smartgrowthindicators.shtml](http://planning.maryland.gov/ourwork/smartgrowthindicators.shtml) for information on the indicators themselves, and see: [http://planning.maryland.gov/pdf/ourwork/sgg/sgg2.pdf](http://planning.maryland.gov/pdf/ourwork/sgg/sgg2.pdf) for information on the indicator legislation.

2.11. **Planning Commissioner Training** – Although Maryland has many local planning commissions and boards, it has never required training for them. Part of the 2009 Smart, Green, and Growing package of legislation introduced by Governor O’Malley included mandatory training. Local governments were given the option to develop their own
courses, use MDP’s, or combine them. MDP developed an a course that can be administered on-line or in-person. It pulled from some training the local governments had developed on their own, content developed by MDP, and other sources. For more information see: http://www.mdp.state.md.us/YourPart/EducationWelcome.shtml

2.12. **Redevelopment & Revitalization**- Maryland has a suite of programs designed to promote infill and revitalization. In addition to the Sustainable Communities Tax Credit summarized in section 2.6 above, the following are other key State programs that address this piece of Maryland’s overall smart growth program.

2.12.1. **Community Legacy** - The Community Legacy program provides capital grants and loans designed to assist communities that have the potential to be vibrant places to live and work. Projects capitalize on the strengths of a community and are part of a larger revitalization strategy. As part of Maryland’s geographical targeting approach these areas are mapped and correspond to Sustainable Communities. These maps and programs are approved by the Smart Growth Subcabinet. For more information see: http://www.neighborhoodrevitalization.org/programs/cl/cl.aspx

2.12.2. **Neighborhood Businessworks** – This program offers business loans that provide flexible gap financing to small businesses locating or expanding in revitalization areas. Funds may be used for real estate acquisition, new construction or rehabilitation, leasehold improvements, machinery and equipment. This program also operates within Community Legacy / Sustainable Community areas. For more information see: http://www.neighborhoodrevitalization.org/Programs/NBW/NBW.aspx

2.12.3. **Other Related Programs** – The State has several other allied programs focused on redevelopment and revitalization of existing communities. They include the Main Street Maryland Program that offers technical assistance, training, and other services to the 23 Main Street communities across the State, additional tax credits, etc. For more information see: http://www.neighborhoodrevitalization.org/Programs/Index.aspx

2.13. **Enterprise Zones** – Enterprise Zones are an important tool for smart growth in Maryland. They help attract businesses to areas that are often blighted, underused, etc. At times this includes reusing older buildings. Businesses locating in a Maryland Enterprise Zone may be eligible for income tax and real property tax credits in return for job creation and investments. Businesses located in one of two focus areas are also eligible for personal property tax credits. For more information see: http://www.choosemaryland.org/businessresources/Pages/EnterpriseZones.aspx

2.14. **Transportation** – How a state addresses transportation is pivotal to its smart growth success. The Maryland Department of Transportation (MDot) is a key player in the State’s smart growth efforts and has several programs specifically designed to enhance smart growth. MDoT also has the advantage of having all modes of
transportation under one cabinet agency which allows for multimodal approaches to transportation issues. Two program areas are listed below.

2.14.1. *Transit Oriented Development* – Maryland is a densely populated state and is still growing. While transit serves portions of the State’s urban areas, there are suburban areas continuing to become more urban and Transit Oriented Development can be a game changer for creating or transforming such areas into attractive and highly functional communities and job centers. Maryland’s TOD program seeks to enhance transit options in existing and growing communities through a planned and targeted approach. Please see the following link for more information. http://www.mdot.maryland.gov/Office%20of%20Planning%20and%20Capital%20Programming/TOD/Index.html

2.14.2. *Project Planning and Neighborhood Conservation* – The Department considers smart growth issues from the project planning stage throughout the process. It also must comply with the Priority Funding Area Act. In addition, MDoT has efforts such as its Neighborhood Conservation program that address the more granular, community scale issues associated with transportation. For more information see: http://www.mdot.maryland.gov/Office%20of%20Planning%20and%20Capital%20Programming/Capital_Programming.html

3. **PlanMaryland**

With all of Maryland’s planning history, multitude of programs, and successes, it is ironic there has never been one strategy that ties them together and sets forth an approach for gaining efficiencies and synergies, and a game plan for basically moving forward. That is the core of what PlanMaryland is about. Many have realized the wisdom of doing this before, which is why the Maryland General Assembly passed a law in 1959 requiring MDP to produce this plan. Governor O’Malley directed MDP to work with sister agencies, local governments, and other stakeholders to develop a plan. In December 2011 PlanMaryland was delivered to the Governor and he signed an executive order accepting the Plan and directing his agencies to implement it. To see the Plan, its executive summary, and other related items, see: PlanMaryland Webpage: http://plan.maryland.gov/

3.1. **Plan Development** – Dr. Knaap’s paper provides a lot of background and commentary on the Plan’s development. Early on in his administration Governor O’Malley decided Maryland needed to develop a state development plan. He felt it was essential for moving smart growth forward in the State since local governments had their own plans and also since the State had many smart growth programs without a strategy for tying them together and taking next steps, i.e., a plan. Dr. Knaap’s paper indicates that a lack of a requirement for legislative adoption was one of the reasons the Governor was supportive of developing PlanMaryland. That is false. The Governor had already decided to move forward with PlanMaryland well before he knew legislative adoption was not required. An interesting piece of background, as Mayor of Baltimore before becoming Governor he directed the City’s Planning Department to develop its first comprehensive plan update in 30 years.
For Plan development MDP relied on sister agencies, local governments, and the Sustainable Growth Commission (and its task force predecessor). As with the development of any plan there are tough issues, especially since the State had never developed a plan before. However, there was broad agreement that the State should have a plan. Much of the outreach for the Plan involved articulating what the State’s existing programs are and generally how they relate to each other. So many programs have been developed of many decades that very few people had a sense of what the overall smart growth landscape looked like in Maryland. Simply by outlining this information provided a platform for those opposing the State’s existing smart growth efforts. On the other side of the equation, smart growth advocates, while supportive, had a hard time becoming excited about the Plan because it is initially focused on better using existing programs and they are often motivated by new legislation.

3.2. **Plan Outreach** - The three year process of developing the plan included extensive outreach and communication via several forums and methods. Citizens were generally supportive of the Plan overall, and specific issues were debated. However the Plan is initially meant to be a broad policy document with specifics developed over time. Factoring this into how the Plan relates to more specific existing local plans and zoning was challenging for some at times. For more information on PlanMaryland’s outreach efforts see: [http://plan.maryland.gov/PDF/WhatIsIt/PM_Outreach.pdf](http://plan.maryland.gov/PDF/WhatIsIt/PM_Outreach.pdf)

3.3. **Plan’s Initial Spatial Structure** - Dr. Knaap’s paper criticizes the Plan’s lack of a spatial structure. While we are working with local governments on a land designation effort to bring together the State’s and local governments’ visions for how specific areas are planned, the PlanMaryland initiative started off with a very clear spatial structure and remains today. It consists of the PFAs for development areas and generally areas outside of the PFAs for preservation. Getting more specific, the State outlined subsets of PFAs targeted for infill, redevelopment, and revitalization. This targeting effort was not developed by scratch, it was essentially an exercise of mapping the State’s existing redevelopment and revitalization programs—most of which have local sponsorship component. This map is called “GrowthPrint.” Interestingly enough, MDP staff initially developed a GIS model to highlight areas that should be targeted for extra attention within PFAs. What we found out was since this analysis was based on parameters such as blighted communities, underused buildings, unemployment, etc., the resultant maps very closely resembled maps of existing redevelopment and revitalization programs. Therefore we moved forward with GrowthPrint by focusing on the existing programs. Two analogous targeting tools are used for targeting rural protection areas: GreenPrint and AgPrint. While there are areas in common between these two mapping tools, GreenPrint is focused on habitat and water quality protection and AgPrint is focused on large contiguous tracts of undeveloped land, ranking them based on development threat, ability to be protected, and related parameters. Taken together the three Prints and the PFAs essentially constitute the land use policy map for PlanMD. Moving forward, the State will work with local governments, the Sustainable Growth Commission, and other stakeholders take this policy map the next level via the land designation process. For more information see the website that includes the three key targeting tools (AgPrint, GreenPrint, and GrowthPrint): [http://www.agprint.maryland.gov/](http://www.agprint.maryland.gov/)
4. Moving Maryland Forward with Smart Growth

As demonstrated in this and Dr. Knaap’s papers Maryland has a significant smart growth infrastructure. The State’s dynamics call out for a smart growth approach and this will continue. The O’Malley Administration is obviously committed to Maryland’s communities (people and the built environment), rural land for resource protection and resource production, the Chesapeake Bay, and economic development. It’s hard to see how to maintain these priorities together without smart growth. The Administration is making the best use of existing programs while addressing the key gaps in the State’s overall smart growth apparatus. PlanMaryland is intended to be the oracle to strategically orient the State’s smart growth efforts together, and to help link this overall effort to regional and local planning programs. In many ways Maryland’s planning history has been incremental and piecemeal. This administration’s approach has been to tie the State’s efforts together into a planning program, filling the key gaps, and developing a game plan. I think we have met this challenge. No doubt there is more work to do. The Plan needs to move forward with its implementation strategy development, land designation process, and potentially adding content to the Plan that more fully addresses housing, transportation, and economic development issues. As Daniel Burnham once said: “Make no little plans…”