Department of Housing & Community Development
Legislative Comments
September 18, 2026

CB-097-2026 - Affordable Housing Opportunity Sites Program

DHCD Comments:

While DHCD has expertise in affordable housing finance, underwriting, affordability requirements and development programs, the Department does not independently perform comprehensive land-use, zoning, infrastructure, environmental or development-capacity analyses necessary to determine whether land is suitable for development. These functions require substantial coordination with M-NCPPC, DPIE, DPWT, and other appropriate agencies. DHCD's role would be more appropriately focused on evaluating the affordable housing potential of sites identified through such an interagency process.

Meaningful due diligence on potentially hundreds of publicly and privately owned parcels, would require additional staff.

CB-099-2026 – Small Housing Provider Financing Program

DHCD Comments:

The legislation establishes a new program that DHCD would be required to develop, administer and monitor without providing additional staffing or administrative resources. Implementation would require application processing, underwriting, income and ownership verification, inspections, rehabilitation oversight, loan and grant closings, construction monitoring, disbursement, and long-term monitoring of the required 15-year affordability restrictions. DHCD does not currently have dedicated staff capacity to undertake these additional responsibilities without impacting administration of its existing affordable housing programs.

DHCD may not be the most appropriate agency to administer all aspects of the proposed program. Determining hazardous or unsafe property conditions and overseeing moderate repairs may more appropriately involve DPIE.

CB-110-2026 – Small Landlord Preservation Grant Program

DHCD Comments:

This Bill appears to substantially overlap with the Small Housing Provider Financing Program proposed under CB-099-2026. Both bills establish new financial assistance programs administered by DHCD for small rental property owners for purposes that include property maintenance, rehabilitation and preservation of affordable rental housing. Clarification is sought as to whether these bills are intended to establish two

separate programs and, if so, how the programs are intended to differ with respect to eligible applicants, eligible uses, affordability requirements and funding sources.

As mentioned earlier, the new program would require additional staffing to assist with establishing application and award procedures, evaluating properties and applicants, administering financial assistance, overseeing rehabilitation activities, monitoring affordability requirements and performing ongoing compliance and reporting.

CB-114-2026, the Tenant Rights Education and Accessibility Act

DHCD Comments:

We recommend that a public-facing tenant resource document should first be supported by the establishment of a Landlord Tenant or Consumer Rights law for the County, which would establish a basis for the guide. Additionally, DHCD would require at least .5 FTE and a communications budget to stand up a website, branding, and media campaign.

CB-121-2026 Affordable Rental Housing Search Portal Act

DHCD Comments:

It would be difficult for DHCD to create such a portal because the agency does not own or lease real property, is not a developer, and does not operate public housing units. For DHCD to provide this level of data, it would have to come from third-party property management agents, and we would have to create a mechanism that requires them to provide this level of reporting and a means of capturing that data.