Maryland DEPARTMENT OF PLANNING

November 26, 2024

Kara Willis, Chair Planning Commission The Town of Centreville 101 Lawyers Row Centreville, MD 21617

Dear Chair Willis,

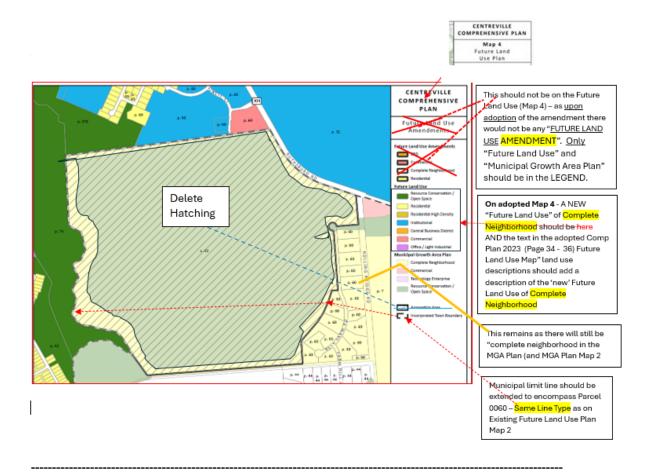
Thank you for the opportunity to comment on the Town of Centreville 2023 Comprehensive Plan land use map amendment (Plan Amendment). The Maryland Department of Planning (MDP) believes good planning is important for efficient and responsible development that addresses resource protection, adequate public facilities, housing, community character, and economic development. Please keep in mind that MDP's comments reflect the department's thoughts on ways to strengthen the town's draft Plan Amendment.

MDP forwarded a copy of the draft Plan Amendment to several state agencies for review, including: the Maryland Departments of Transportation, Environment, Natural Resources, Commerce, Environment, and Housing and Community Development. To date, we have received comments from Natural Resources (DNR) and DNR's Critical Area Commission. These comments are included with this letter and any plan review comments received after the date of this letter will be forwarded to you upon receipt.

This Plan Amendment appears to be, in part, a "curative" amendment to consistently align the land use designations, zoning classifications, and/or existing development on several properties within the municipal boundary. Indeed, four (4) of the five (5) map amendments fit this curative description and are currently within the town (identified as items 1, 2, 4, and 5 in the town's 60-day review Clearinghouse submittal). MDP has no comment on these four (4) amendments to the 2023 Comprehensive Plan - Future Land Use Plan (Map 4).

The town's third amendment (item 3 of 5) is identified as Tax Map 044F, Parcel 0060. The department notes that this property was annexed by the town on September 5, 2024, and the town submitted an adopted and effective resolution to MDP on November 22, 2024. Given this circumstance, it is appropriate, as proposed in the Plan Amendment, for the town to amend Map 4 to change the Municipal Growth Area (MGA) Plan land use designations (of Resource

Conservation/Open Space, Complete Neighborhood, and Commercial) to reflect the entire property as having an MGA Plan land use designation of Complete Neighborhood. MDP notes that the draft amended Future Land Use Amendments map on page 5 of the town's submitted Transmittal Letter and Memo includes a few legend and symbology discrepancies with the currently adopted Map 4. These discrepancies may only be intended to communicate the amendments, and the town plans to reconcile the legend and symbology of Map 4 upon adoption, but MDP highlights them in the annotated map below for the town's consideration.



MDP also suggests that the town revise Growth Area Plan (Map 2) on page 27 of the Comprehensive Plan to show the new municipal limit and remove Parcel 60 from the growth area. The town should also consider needed amendments to other Comprehensive Plan maps, such as Growth Tier Designations (Map 1B), on page 26.

MDP reminds the town to copy MDP staff, including Stephanie Mullinix (stephanie.mullinix@maryland.gov), on the transmission of post-annexation notification documents to DLS (as described in MDP's 8/30/24 annexation review letter to the town) so we can update our municipal data layers.

Given that the proposed Plan Amendment will change the future land use for several parcels (most

notably the 279-acre property identified as Tax Map 044F, Parcel 0060), MDP suggests the town conduct an analysis of the impact of the land use changes to future demand and capacity for water and sewer resources, stormwater, nutrient loading, and climate change considerations? MDP's Water Resources Element (WRE) Guidance Update can be used to guide the town regarding 'best practices' for water resources planning.

MDP staff are available if Centerville staff would like to meet to discuss our comments. The department respectfully requests that this letter and accompanying review comments be made part of the town's public hearing record. Should the Plan Amendment be adopted, please send Keith Lackie a final version of the amendment in PDF format.

If you have any questions or concerns regarding these comments, please email Keith Lackie, Regional Planner, MDP Lower Eastern Shore Regional Office at keith.lackie@maryland.gov.

Sincerely,

Joseph Griffiths, AICP

Director, Planning Best Practices

John Effths

Enclosures: Review Comments, Maryland Department of Natural Resources (DNR) and DNR Critical Area Commission

cc: Carolyn Brinkley, Centreville Town Manager, Stacey Dahlstrom, AICP, Town of Centreville, Amy Morelock, Queen Anne's County Department of Planning and Zoning, Keith Lackie and David Dahlstrom, MDP



Wes Moore, Governor
Aruna Miller, Lt. Governor
Josh Kurtz, Secretary
David Goshorn, Deputy Secretary

Maryland Department of Planning 301 West Preston Street Suite 1101 Baltimore, MD 21201

Memo: Maryland DNR comments on Centreville Land Use Map Amendments

To: Joseph Griffiths cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on the proposed amendment to the Land Use Map in the Town of Centreville Comprehensive Plan 2040. The draft document along with Centreville's recently adopted Comprehensive Plan was distributed to appropriate contacts at the Maryland Department of Natural Resources and the draft amendments reviewed. DNR offers the following comments:

DNR would encourage Cnetreville to connect with Michael McQuarrie from Land Acquisition and Planning (<u>michael.mcquarrie@maryland.gov</u>). Project Open Space - Local has funded four pieces of property in Centreville that have land use restrictions. Please verify eligibility with LAP before designating any land.

While comments are not being solicited on the comprehensive plan at this time, Maryland DNR staff wanted to acknowledge that the plan as a whole is comprehensive and does a good job with focusing on the non-tidal stream resources within the town of Centreville – aiming to protect the three major non-tidal tributaries of Three Bridges Branch, Gravel Run, and Old Mill Stream. The town plan aims to maintain or establish vegetated buffers to be at least 100 feet wide and up to 300 feet wide. This is a good measure to maintain stream health and should help reduce nutrient and sediment loads to the tidal Corsica. This is a very proactive approach compared to other recently reviewed plans. As always, Maryland DNR recommends that town planners consider increasing buffer widths in areas with steep slopes along streams by 2 feet per 1% of slope (as prescribed by S. Wenger. A review of the scientific literature on riparian buffer width, extent, and vegetation. Office of Public Service and Outreach. Institute of Ecology. University of Georgia 1999). Long-term maintenance of planted buffers should be included in riparian reforestation plans to reduce impacts from invasive plant and animal species that could reduce tree survival and growth. Additionally, city planners should seize opportunities to improve fish passage when replacing aging infrastructure at stream crossings. Bridge improvements or culvert replacements should be installed to accommodate high flow events and to minimize obstacles to the movement of both resident and migratory aquatic species.

There are 1,032 housing units available under the water supply limitations. We project that if all these units are built out, impervious surface coverage for the whole watershed will be about 5%. Growth outside of town (including areas to be annexed into town and Queen Anne's County) should be limited as much as possible to keep the watershed near 5% impervious surface. This is considered a safe target for fish habitat. Ten percent impervious coverage should not be considered as a growth target if aquatic resources are a concern; this is the tipping point for increasingly intractable aquatic habitat degradation that should be avoided.

There will be a greater impact on the streams in the annexed area than in the whole watershed. It appears a large portion of additional housing units proposed by Centreville would be located on parcel 0060 (Growth Area 4), which is adjacent to the existing municipal boundary. Mill Stream Branch is adjacent to the parcel boundary, so intense stormwater management and stream buffers will be critically important. Anadromous fish spawning (herring species and Yellow Perch) has been documented in Mill Stream Branch.

The use of cluster development to limit environmental impacts is good, but the concern would be pulses of water during high rain events. The use of proper stormwater management practices would be necessary. The plan to preserve open space around the development would be important.

Maryland Forest Services has a few general recommendations and resources for the town:

- The Maryland Forest Service recommends implementing a Forestry Program, would promote the State Forest Action plan and the community could benefit from the addition of a town Forestry Conservation Ordinance. Maryland Forest Service understands that Centerville already has a Tree Care Ordinance but believes the town would benefit from a Forestry Conservation Ordinance.
- USFS Wildland urban interface is an important concept to consider. Maryland Forest Service reviewed for Centerville based on this map, urban wildland interface is not significant at this time, however with changing climate would benefit with further review and addition of an urban wildland protection plan, reach out to Maryland Forestry Fire Staff for more information.
 (https://data-usfs.hub.arcgis.com/documents/7804d89ed1094ccb9aae753228e8d89a/explore)
- Programs like Tree City USA and Maryland PLANT Award could be a great way for the city to receive
 recognition for their tree planting and care efforts. Maryland Forest Service noted that Centerville was
 awarded Tree City USA in 2022 but is not on the current national list. Recommendation to rejoin, if possible.
 Maryland PLANT Award has similar criteria to Tree City USA and reading through this plan, reviewers have
 concluded Centerville would be a good candidate for that as well.
- Maryland Forest Service encourages Natural Resource Plan Objective 4, to facilitate natural migration of wetlands and natural vegetation so buffers continue to function improving water quality and minimize flooding. Note to focus on native vegetation and ensure the migration is not invasive and noxious plants.
- With urban plantings, thought should be given to climate change and what species would thrive in an altered climate. We recognize preservation of remaining forest to vitality of maintaining the connectivity of fragmented forest is vital to wildlife habitat, try and maintain that connection. Maryland Forest Service agrees with the town's recognition that natural buffers improve water quality and planting of unbuffered areas takes priority followed by planting to augment existing forest areas. Maryland Forest Service can help identify sites and programs that can assist.
- The Maryland Forest Service Supports the implementation of a forestry program to promote forest health. Maryland Forest Service and Maryland Department of Agriculture staff can assist the town in identifying prevalent forest health needs such as emerald ash borer (EAB), invasive and noxious plants, and encouraging the town's use of native plant species in landscaping projects. We also encourage staff awareness and training of invasive plant species identification and removal options.

Once again, thank you for the opportunity to provide comments. If you have any questions about these comments or would like further information, please do not hesitate to contact me at 443-534-4151 or christine.burns1@maryland.gov.

Best, Christine Burns



Erik Fisher
Chair

Katherine Charbonneau
Executive Director

STATE OF MARYLAND CRITICAL AREA COMMISSION CHESAPEAKE AND ATLANTIC COASTAL BAYS

October 10, 2024

Joe Griffiths, AICP Director, Planning Best Practices Maryland Department of Planning 120 E. Baltimore St., Suite 2000 Baltimore, MD 21202

Re: Centreville Comp Plan Future Land Use Map Amendments

Dear Mr. Griffiths:

Thank you for the opportunity to review the Town of Centreville's proposed amendments to its Future Land Use Map. Based on a review of the submitted information, we have the following comments:

- Map 44B, Parcel 1056 (2641 Centreville Road) is located entirely within the Critical Area on land designated as Limited Development Area (LDA) and Intensely Developed Area (IDA). The Future Land Use Map is being amended to show the Commercial designation over the entire parcel (the LDA portion of Parcel 1056 is currently designated Resource Conservation Open Space). Based on aerial imagery, Parcel 1056 appears to be mostly forested. Development within the LDA must meet the requirements of the Town of Centreville's Critical Area program including the 15% lot coverage limit in the LDA and forest/developed woodland clearing limits. Therefore, any future development proposed within the LDA portion of Parcel 1056 may require growth allocation as outlined in COMAR 27.01.03.06.
- Map 44B, Parcel 1085 (425 S. Commerce Street) is located entirely within the Critical Area on land designated as IDA. Development within the IDA must meet the requirements of the Town of Centreville's Critical Area program including Critical Area 10% stormwater management for phosphorus.
- The remaining map amendments are not located within the Critical Area.

Thank you for the opportunity to provide comments. If you have any questions, you may contact me at (410) 260-3476 or susana.makhlouf@maryland.gov.

Sincerely,

Susan Makhlouf

Natural Resources Planner

cc: Rita Pritchett, Maryland Department of Planning