



Maryland DEPARTMENT OF PLANNING

3/10/2025

Jean Moulds
Planning and Zoning Commission Chair
22670 Washington Street, P.O. Box 1, Leonardtown, MD

Dear Ms. Moulds,

Thank you for the opportunity to comment on the Town of Leonardtown's Comprehensive Plan draft (Draft Plan). 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 attached review comments reflect the agency's thoughts on ways to strengthen the Draft Plan, as well as satisfy the requirements of Maryland's Land Use Article.

MDP forwarded a copy of the Draft Plan to several state agencies for review, including: the Maryland Historical Trust and the Departments of Transportation, Environment, Natural Resources, Commerce, Disabilities, and Housing and Community Development. To date, we have received comments from the Departments of Housing and Community Development, Transportation, Environment, and Natural Resources. These comments are included with this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

The department's comments are written to assist Leonardtown in realizing its visions and compliance with state requirements. MDP staff are available to assist Leonardtown in any Draft Plan updates, including meeting the housing element requirements. Please let the department know if the town would like to meet with us to discuss our comments.

MDP respectfully requests that this letter and accompanying review comments be made part of the city's public hearing record. When the Draft Plan is adopted, please send Carter Reitman a PDF copy of the final document.

If you have any questions or concerns regarding these comments, please email Carter Reitman at carter.reitman2@maryland.gov.

Sincerely,

A handwritten signature in blue ink that reads "Joe Griffiths".

Joe Griffiths, AICP
Director, Planning Best Practices

Enclosures: Review Comments Leonardtown Draft Town Plan Amendment

cc: Dan Burris, Mayor, Town of Leonardtown
Laschelle McKay, Town Administrator, Town of Leonardtown
Jeanine Harrington, Assistant Town Manager, Town of Leonardtown
Susan Llareus, Planning Supervisor, Maryland Department of Planning
Carter Reitman, Maryland Department of Planning



**Maryland Department of Planning
Review Comments
Town of Leonardtown Comprehensive Plan
March 2025**

The Maryland Department of Planning (MDP) received the Draft Town of Leonardtown Comprehensive Plan 2025 (“Draft Plan”) from Leonardtown on January 10, 2025. These comments are offered as suggestions to improve the Draft Plan and better address the statutory requirements of the Land Use Article (LUA). Other state agencies, as noted below, have contributed comments and others may submit comments separately. If comments are subsequently received by MDP, the department will forward them to Leonardtown.

Draft Plan Summary

This Draft Plan is a full update to the adopted and approved 2010 Comprehensive Plan, as previously amended. The Draft Plan differs significantly from 2010 Plan in structure and content. Whereas Leonardtown organized its 2010 plan element by element, the Draft Plan organizes these elements into four major sections with consistent areas of emphasis. Some elements have also been renamed “for ease of public understanding” but still include appropriate references to the LUA. The timeline of the Draft Plan extends to 2035, ten years into the future, consistent with Maryland’s 10-year cycle for local comprehensive plans. The Draft Plan projects that the town’s population will increase to 6,174 by 2035. The Draft Plan meets most of the requirements identified in the LUA, but MDP believes the housing element may not meet certain requirements following the passage of HB90 and requests that the town discuss this with its attorney. MDP gives additional recommendations for revision or consideration in analysis below specific to the Draft Plan’s respective sections.

Plan Implementation Progress

The Draft Plan includes a description of completed objectives from the 2010 Comprehensive Plan on page 6.

Maryland State Visions – Synopsis

Land Use Article Section 1-201 requires Maryland jurisdictions with planning & zoning authority to implement the state’s twelve planning visions (Visions) through a comprehensive plan. The visions reflect the state’s ongoing aspiration to develop and implement sound growth and development policy. The visions address: quality of life and sustainability; public participation; growth areas; community design; infrastructure; transportation; housing; economic development; environmental protection; resource conservation; stewardship; and implementation approaches.

Plan Analysis

The following is an analysis of each of the Visions and comments relating to the comprehensive plan proposal to integrate these visions.

- (1) **Quality of life and sustainability:** a high quality of life is achieved through universal stewardship of the land, water, and air resulting in sustainable communities and protection of the environment.

Comment: The Draft Plan addresses this vision in its Community Facilities Element and Parks and Recreation Element.

- (2) **Public participation:** citizens are active partners in the planning and implementation of community initiatives and are sensitive to their responsibilities in achieving community goals;

Comment: This Draft Plan addresses this vision on page 5.

- (3) **Growth areas:** growth is concentrated in existing population and business centers, growth areas adjacent to these centers, or strategically selected new centers;

Comment: The Draft Plan addresses this vision in its Municipal Growth Element.

- (4) **Community design:** compact, mixed-use, walkable design consistent with existing community character and located near available or planned transit options is encouraged to ensure efficient use of land and transportation resources and preservation and enhancement of natural systems, open spaces, recreational areas, and historical, cultural, and archaeological resources;

Comment: The Draft Plan addresses this vision throughout—and particularly in its Transportation Element and Housing Element.

- (5) **Infrastructure:** growth areas have the water resources and infrastructure to accommodate population and business expansion in an orderly, efficient, and environmentally sustainable manner;

Comment: The Draft Plan addresses this vision in its Municipal Growth Element and Land Use Element.

- (6) **Transportation:** a well-maintained, multimodal transportation system facilitates the safe, convenient, affordable, and efficient movement of people, goods, and services within and between population and business centers;

Comment: The Draft Plan addresses this vision in its Transportation Element.

- (7) **Housing:** a range of housing densities, types, and sizes provides residential options for citizens of all ages and incomes;

Comment: The Draft Plan addresses this vision in its Housing Element.

(8) **Economic development:** economic development and natural resource-based businesses that promote employment opportunities for all income levels within the capacity of the State's natural resources, public services, and public facilities are encouraged;

Comment: The Draft Plan addresses this vision in its Downtown and Waterfront Element.

(9) **Environmental protection:** land and water resources, including the Chesapeake and coastal bays, are carefully managed to restore and maintain healthy air and water, natural systems, and living resources;

Comment: The Draft Plan addresses this vision in its Sensitive Areas Element.

(10) **Resource conservation:** waterways, forests, agricultural areas, open space, natural systems, and scenic areas are conserved;

Comment: The Draft Plan addresses this vision in its Sensitive Areas Element.

(11) **Stewardship:** government, business entities, and residents are responsible for the creation of sustainable communities by collaborating to balance efficient growth with resource protection;

Comment: The Draft Plan addresses this vision in its Municipal Growth Element.

(12) **Implementation:** strategies, policies, programs, and funding for growth and development, resource conservation, infrastructure, and transportation are integrated across the local, regional, State, and interstate levels to achieve these visions.

Comment: The Draft Plan addresses this vision in its Implementation section.

The Draft Plan effectively addresses all the visions. Additional recommendations for the Draft Plan to enhance incorporation of the Visions is included below.

Municipality Minimum Planning Requirements

Land Use Article Section 3-102 describes the required and optional elements for non-charter county and municipal comprehensive plans but does not mandate how they are to be addressed. The following checklist identifies required plan elements and how Leonardtown addresses them.

Checklist of LUA Element Requirements for Non-Charter Counties and Municipalities			
Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Leonardtown
(1) A comprehensive plan for a non-charter county or municipality must include:	L.U. § 3-102(a)		
(a) a community facilities element	L.U. § 3-102(a)(1)(i)	L.U. § 3-108 -- Community facilities element.	Community Facilities Element, page 24

Checklist of LUA Element Requirements for Non-Charter Counties and Municipalities			
Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Leonardtown
(b) an area of critical state concern element	L.U. § 3-102(a)(1)(ii)	L.U. § 3-109 -- Areas of critical State concern element	Sensitive Areas Element, page 64
(c) a goals and objectives element	L.U. § 3-102(a)(1)(iii)	L.U. § 3-110 -- Goals and objectives element	Included throughout and compiled in Section 4, page 91
(d) a housing element	L.U. § 3-102(a)(1)(iv)	L.U. § 3-114 -- Housing element SB-687(2021)	Housing Element, page 36
(d) a land use element	L.U. § 3-102(a)(1)(v)	L.U. § 3-111 -- Land use element	Land Use Plan Element, page 86
(e) a development regulations element	L.U. § 3-102(a)(1)(vi)	L.U. § 3-103 -- Development regulations element	Downtown and Waterfront Element, page 41, and Section 3, page 45
(f) a sensitive areas element	L.U. § 3-102(a)(1)(vii)	L.U. § 3-104 -- Sensitive areas element	Sensitive Areas Element, page 64
(g) a transportation element	L.U. § 3-102(a)(1)(viii)	L.U. § 3-105 -- Transportation element	Transportation Element, page 72
(h) a water resources element	L.U. § 3-102(a)(1)(ix)	L.U. § 3-106 -- Water resources element	Water Resources Element, page 45
(i) a mineral resources element, IF current geological information is available	L.U. § 3-102(a)(2)	L.U. § 3-107 -- Mineral resources element	See discussion regarding the Mineral Resources Element below.
(j) for municipalities only, a municipal growth element	L.U. § 3-102(a)(3)	L.U. § 3-112 -- Municipal growth element	Municipal Growth Element, page 79
(k) for counties only if located on tidal waters, a fisheries element	L.U. § 3-102(a)(4)	L.U. § 3-113 -- Fisheries element	N/A
Optional: (2) A comprehensive plan for a non-charter county or municipality MAY include: (a) a community renewal element; (b) a conservation element; (c) a flood control element; (d) a natural resources element; (e) a pollution control element; (f) information concerning the general location and extent of public utilities; and (f) a priority preservation area (PPA) element	L.U. § 3-102(b)	L.U. § 3-102(b)(2)(i)	
(3) Visions -- A local jurisdiction SHALL through	L.U. § 3-201(c)	L.U. § 1-201 -- The 12 Planning Visions	Included

Checklist of LUA Element Requirements for Non-Charter Counties and Municipalities			
Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Leonardtown
the comprehensive plan implement the 12 planning visions established in L.U. § 1-201			
Optional: (4) Growth Tiers -- If the local jurisdiction has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the jurisdiction's comprehensive plan	L.U. § 1-509		None adopted

Conformance with Section 3-102 of the Land Use Article

The following analyzes how the Draft Plan meets the requirements of municipal comprehensive plan elements, in accordance with the Land Use Article.

1. Development Regulations Element – Synopsis

The development regulations element is required to include the planning commission’s recommendations for land development regulations to implement the plan. Regulations are required to be flexible to promote innovative and cost saving site design, protect the environment and identify areas of growth. The areas identified for growth are required to encourage flexible regulations, which should further promote economic development using innovative techniques, streamlining the review of applications, including permit review and subdivision processing.

Plan Analysis

The Draft Plan addresses development regulations throughout the document and particularly in its Downtown and Waterfront Element and Section 3: Environment, Infrastructure and Growth. Leonardtown’s goals include updating the town’s zoning code to make infill development and adaptive reuse of existing buildings downtown more attractive for investment. The Draft Plan also includes a development capacity analysis identifying the town’s maximum capacity and remaining capacity for development with current zoning. (pg. 83)

2. Housing Element - Synopsis

The housing element is required to address the need for housing within the jurisdiction that is affordable to low-income and workforce households. The housing element is also required to also assess fair housing and ensure that a jurisdiction if affirmatively furthering fair housing through its housing and urban development programs.

Plan Analysis

The Draft Plan includes a distinctive chapter for its housing element. The Draft Plan estimates 510 additional dwelling units are needed in the ten-year horizon of the plan. The chapter includes a vision for the future of housing in Leonardtown, a description of existing conditions, and a list of goals for housing. Its major goals include increasing diversity of housing types and affordability options. The Draft Plan states the town's support for accessory dwelling units and indicates that there is no need to change town regulations to support their development.

The Draft Plan appears to meet some but not all the requirements for comprehensive plan housing elements as described in the LUA. The Draft Plan acknowledges and responds to its requirement to address the need for workforce and low-income housing. Despite that acknowledgement and its strong focus on increasing affordability, the Draft Plan does not differentiate, in its description of goals and action items, between its plans for workforce housing (for homeownership households earning 60% to 120% of AMI and renting households earning 50% to 100% of AMI) and low-income housing (for households earning less than 60% of AMI) as defined in the LUA. The LUA requires that comprehensive plans address the need for affordable housing, including workforce housing and low-income housing.

Additionally, the Draft Plan does not seem to acknowledge its requirement to affirmatively further fair housing, assess the status of fair housing in the town, or describe strategies and actions it will take to reduce segregation and create truly integrated living patterns. The Draft Plan must include these components to comply with the LUA. While LUA Section 3-114 does not define what a fair housing assessment should entail nor what specific actions should include, MDP recommends a spatial analysis of segregation and concentrated poverty to determine current patterns, which could then inform meaningful actions to correct them. Such an analysis could be completed either quantitatively or qualitatively. Potential sources of quantitative data can be found on MDP's [HB 90 Resources](#) webpage. Alternatively, a qualitative analysis could be achieved through engagement with Leonardtown stakeholders, including housing organizations serving the community. Potential questions to include in such engagement include:

- Do we have residential patterns of racial/ethnic concentration?
- How do our racial/ethnic composition & patterns compare to the county?
- If there are areas of concentration, are any of these areas combined with high levels of poverty or low-income households?
- How do these areas of concentration compare with measures of access to opportunity, such as education outcomes, levels of employment/unemployment, levels of education, percent vacant homes, and/or amount of nearby employment?

If such an analysis cannot be completed prior to plan adoption, MDP encourages the town to discuss with its attorney the feasibility of including such an analysis, and any subsequent planning actions, as an implementation measure in the Draft Plan's housing element.

3. Sensitive Areas Element – Synopsis

The sensitive areas element is required to include the goals, objectives, principles, policies, and standards designed to protect sensitive areas from the adverse effects of development (more recently referred to as climate change impacts). The LUA also assigns sensitive areas element data provision and review responsibilities to the Maryland Departments of the Environment (MDE) and Natural Resources (DNR).

Plan Analysis

The Draft Plan includes a distinctive chapter for its sensitive areas element. The chapter includes goals, objectives, principles, policies, and standards designed to protect sensitive areas from the adverse effects of development. It includes sections dedicated to streams and wetlands, floodplains, steep slopes and erodible soils, habitats of threatened or endangered species, greenways, and forested areas. The Draft Plan’s major goals are to protect and preserve sensitive environmental features.

DNR and MDE provided the attached comments with detailed recommendations for the Draft Plan.

4. Transportation Element - Synopsis

The transportation element is required to reasonably project into the future the most appropriate and desirable location, character, and extent of transportation facilities to move individuals and goods, provide for bicycle and pedestrian access and travelways, and estimate the use of proposed improvements.

Plan Analysis

The Draft Plan includes a distinctive chapter for its transportation element. This chapter includes a vision for the future of transportation in Leonardtown, a description of existing conditions, and a list of prioritized goals and actions. Its major goals are to preserve and enhance both road and pedestrian connectivity.

The Maryland Department of Transportation provided the attached comments with detailed recommendations for changes to the Draft Plan. MDP also offers the following comments for Leonardtown’s consideration:

- According to the Draft Plan (pg. 22), 1,390 residents left Leonardtown for employment, while 221 residents remained in town for work and 5,489 workers commuted to town for employment. Roads and bridges are burdened due to increased commuting demands and employment and economic activity generated outside the town represents a missed opportunity to capture revenue that could be used to fund priority local government services and programs. To reduce single-occupancy vehicle commuting and the associated wear and tear on transportation infrastructure, there may be opportunities to expand the promotion of commuter choice programs and alternative transportation to help reduce in-town and pass-through traffic. There are [multiple incentive programs](#) to support alternative transportation, e.g., transit, ridesharing, and telework/flexible work, for commuters in Maryland. These

programs are available for Leonardtown residents. MDP recommends that the Draft Plan identify potential transportation-related maintenance responsibilities and associated expenses for roads, bridges, multi-use paths and transit that may serve growth areas as identified on page 76.

- The Draft Plan contains elements of a complete streets policy, such as discussions on bicycle and pedestrian facilities and traffic calming on page 77. MDP encourages Leonardtown to consider developing a complete streets policy.
- MDP appreciates the town's desire to upgrade existing streets and construct new sidewalks (pgs. 75 & 77), which will help improve mobility for all users and increase safety for bicyclists and pedestrians.
- Leonardtown may consider including information on recreational trails so that residents are aware of non-motorized transportation facilities that provide access to parks, playgrounds, nature trails, community centers, senior centers, schools, and other recreational destinations.
- To improve bicycle and pedestrian connectivity within the town, the state provides various funding and technical support programs to support local efforts to improve pedestrian and bicycle facilities. Here is the link to the website that features the Maryland Department of Transportation (MDOT)'s active transportation programs:
<https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=24>
- Also, below is a link to MDOT's new Maryland State Transportation Trails Strategic Plan, which is designed to improve and expand trail connectivity in Maryland:
<https://www.mdot.maryland.gov/tso/pages/newsroomdetails.aspx?PageId=38&newsId=832>
- MDOT also implements Complete Streets statewide for state highways. Please check this link for MDOT's Complete Streets Initiative:
<https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=207>
- In addition, please consider the Federal Highway Administration (FHWA)'s report on "[Small Town and Rural Multimodal Networks](#)," which provides best practice examples to enhance pedestrian and bicycle networks in rural communities and small towns.
- To benefit town residents and travelers using MD-234, MDP recommends that Leonardtown consider including a policy within the comprehensive plan to support electric vehicle charging infrastructure.
- If the town wishes to expand its EV charging infrastructure, technical and financial assistance programs are available. Please refer to the Maryland's EV website at https://marylandev.org/local_ev_resources/.

5. Water Resources Element – Synopsis

The water resource element (WRE) is required to consider available data provided by MDE to identify drinking water that will be adequate for the needs of existing and future development proposed in the plan, as well as suitable receiving waters and land areas to meet stormwater management and wastewater treatment and disposal needs. MDE and MDP are available to provide technical assistance to prepare the water resources element, ensuring consistency with MDE programs and goals. MDE and MDP jointly developed WRE guidance to demonstrate how local governments can ensure compliance

with the WRE requirements. Local jurisdictions are expected to implement the most important aspects of the MDE/MDP WRE guidance.

Plan Analysis

The Draft Plan includes the town's first WRE. It is divided into several major sections dedicated to the town's drinking water, stormwater management, wastewater management, and other concerns. The chapter includes just two goals dedicated to maintaining a safe water supply and managing stormwater. The town explains they would need to expand their water and wastewater system capacities and permit allocations to meet projected future demand, including the build-out scenario in the municipal growth element (MGE). The wastewater treatment plant (WWTP) is currently being expanded to a 1 million gallons per day capacity facility, and the expanded MDE permit would be issued three months after construction is complete. The WWTP expansion will enable the town to treat 4,444 equivalent dwelling units (EDUs).

Page 55 states that full build-out in 2037 equates to 4,386 EDUs; however, page 57 states that "at full build-out, there will be 4,222 total active EDU connections." These two different numbers should be explained or reconciled.

The MGE and land use element illustrate that future land use and growth include non-residential uses. It is unclear if the EDUs that are used to describe demand for water and sewer in the WRE include non-residential uses. The town should consider non-residential demand for water and sewer and calculate demand metrics for non-residential uses that can be included in the WRE analysis.

Likewise, since the MGE indicates increases in use intensity and development/redevelopment density, the town should conduct an analysis of the impact of the increased intensity/density (including non-residential growth) to future demand and capacity for water and sewer resources.

Has the town considered how the increase in intensity/density will impact stormwater, nutrient loading, and climate change considerations? MDP's [WRE Guidance Update](#) can be used to guide the town regarding best practices for water resources planning.

MDE also provided the attached comments with detailed recommendations for the Draft Plan relating to antidegradation of Tier II waters.

6. Goals and Objectives Element - Synopsis

This element requires that comprehensive plan goals, objectives, principles, policies, and standards guide the development, economic growth, and social well-being of the community.

Plan Analysis

The Draft Plan includes goals and objectives in each of its chapters. It also includes a separate section dedicated to implementation that aggregates all the goals and action items. This section also provides more detail on prospective timeframes, responsible parties, implementation partners, and budgets. This section is a helpful accompaniment that clearly provides a guide for the development and economic and social well-being of the community.

7. Land Use Element - Synopsis

The land use element is required to reasonably project into the future the most appropriate and desirable patterns for the general location, character, extent, and interrelationship of the uses of public and private land.

Plan Analysis

The Draft Plan includes a distinct chapter for its land use element. It describes Leonardtown's plans for the future development of the community's built environment. It has just two goals for the future: preserve the town's character while accommodating growth and improve the town's transportation network.

This chapter's second goal includes an action item related to waterfront access, but the rest of its action items are related to the town's transportation network. Unless these action items are meaningfully related, the town may consider creating a separate goal specific to waterfront access, or it could move this language to the section of the Draft Plan dedicated to the town's downtown and waterfront. Additionally, the language on the transportation network seems to be a better fit for the Draft Plan's transportation element.

8. Community Facilities Element - Synopsis

The community facilities element is required to propose, as far into the future as is reasonable, the most appropriate and desirable patterns for the general location, character, and extent of public and semipublic buildings, land, and facilities. These facilities may include, but are not limited to fire stations, libraries, cultural facilities, hospitals, places of worship, school and education facilities, and parks.

Plan Analysis

The Draft Plan includes a distinct chapter for its community facilities element. This chapter includes a description of the town's municipal facilities, education facilities, medical facilities, and police facilities. The Draft Plan also includes a parks and recreation element, which describes the town's existing and planned parks. Major goals in these sections include ensuring adequacy of the community's facilities, supporting existing facilities, and creating a trail-network for the town.

The Maryland Department of Housing and Community Development (DHCD) also provided the attached comment letter with recommendations for DHCD programs that would support Leonardtown's public facilities.

9. Municipal Growth Element - Synopsis

The MGE is only required in Maryland municipal comprehensive plans. The MGE is required to plan for and describe the municipality's past growth patterns, the capacity of land available for new and infill development, and areas outside of the existing corporate boundaries into which the municipality wishes to grow. The MGE is required to calculate the land area needed to satisfy the demand for growth based on population projections and desired densities. The MGE needs to consider and include any rural buffers, transition areas, and sensitive areas to be protected. MGEs are also required to consider and

plan for the community facilities and public infrastructure, as well as their financing mechanisms, required to accommodate desired growth. If a municipality wishes to annex land, such areas are required to be included and described in the MGE.

Plan Analysis

The Draft Plan includes a distinct chapter for its MGE. The chapter includes a description of its growth trends, municipal growth boundary, and a development capacity analysis. It includes two major goals related to managed development.

The Draft Plan's development capacity analysis demonstrates that the town has more capacity than necessary to satisfy its projected growth. The Draft Plan also includes projections for population growth, water demand, school enrollment, and other matters. However, the MGE does not include a description of the public infrastructure necessary to accommodate projected growth within the municipal growth area or the town overall.

The Draft Plan states, "As the population and housing units increase, there will be a corresponding rise in demand for services and facilities. Greater demands on water supply and wastewater treatment facilities will necessitate expansions in capacity. Increased pressures on the county school system are also anticipated. Additional open spaces will need to be created, either through municipal acquisition or dedications resulting from approved development plans. Municipal services required to support the population increase will need to be funded by the Town or other available resources." This seems to gesture at but does not identify the investments that would be necessary in response to projected growth in the municipal growth areas. A description of public services and infrastructure needed to accommodate growth in the municipal growth areas is one of the requirements identified in the LUA for MGEs. The LUA suggests that this focus on libraries, recreation, water and sewerage, public safety, storm water management, and public schools. The Draft Plan addresses all these but not specifically with respect to the municipal growth areas. MDP recommends that planners consider the infrastructural investments necessary to accommodate growth in the town's municipal growth areas with policies in the comprehensive plan that will guide the extensions of water and sewer facilities so that failing septic and well systems can be addressed, and to allow for investment opportunities for land development for additional housing subdivisions and commercial development to accommodate the growing community.

10. Mineral Resources Element - Synopsis

If current geological information is available, a comprehensive plan is required to include a mineral resources element. It should identify land that remains undeveloped to provide a continuous supply of minerals, which are defined in the Environment Article. They include clay, diatomaceous earth, gravel, marl, metallic ores, sand, shell, soil, and stone. The element is required to further identify post excavation land uses and incorporate strategies that balance resource extraction with other land uses and prevent, as much as possible, preempting mineral extraction in the jurisdiction.

Plan Analysis

The Draft Plan does not include a mineral resources element. Leonardtown's current comprehensive plan includes the following note: "Gravel is the only known mineral in or around the Town. Currently, Town ordinances do not permit gravel mines in the Town. (Gravel mines are defined as those in which

gravel is extracted and taken off site. Landowners are permitted to mine gravel on their land for use on site.)" MDP recommends that this note be included in the Draft Plan to comply with the LUA.

Leonardtown is a Sustainable Community and a Maryland Main Street

As part of the Sustainable Community designation, quality of life, environment, economy, transportation, housing, planning and land use, and local capacity are all subjects of the action plan. MDP suggests the town review Leonardtown action plan(s) for consistency with the Draft Plan and consider how the action plan and the financial incentives provided in the Sustainable Communities designation can support plan implementation.

Contact the Maryland Department of Housing and Community Development, Sustainable Communities Program for more information: <https://dhcd.maryland.gov/Communities/Pages/dn/default.aspx>

**Maryland Department of Planning Review Comments
Draft Plan for Leonardtown
March 2025**

STATE AGENCY COMMENTS

The following are state agency comments in support of MDP's review of the draft plan. Comments not included here may be submitted under separate cover, or via the State Clearinghouse. If comments from other agencies are received by MDP, the department will forward them to Leonardtown as soon as possible.

Attachments

- Page 14: Maryland Department of Environment
- Page 23: Maryland Department of Housing and Community Development
- Page 26: Maryland Department of Natural Resources
- Page 30: Critical Area Commission
- Page 31: Maryland Department of Transportation



Local Plan Review: Town of Leonardtown 2025 Comprehensive Plan

Maryland Department of the Environment – WSA/WPRPP

REVIEW FINDING: R1 Consistent with Qualifying Comments
(MD20250110-0014)

Water and Sewer:

In 2022, a Water and Sewer Plan Amendment for the Town of Leonardtown indicated a new well to be constructed adjacent to the proposed storage tank in the proposed Meadow Run development. It is not clear from the text on page 55, if this is the same well and storage tank.

Tier II:

Direct any questions regarding the Antidegradation Review to Angel Valdez via email at angel.valdez@maryland.gov, or by phone at 410-537-3606.

Special protections for high-quality waters in the local vicinity, which are identified pursuant to Maryland's anti-degradation policy.

Anti-degradation of Water Quality: Maryland requires special protections for waters of very high quality (Tier II waters). The policies and procedures that govern these special waters are commonly called "anti-degradation policies." This policy states that "proposed amendments to county plans or discharge permits for discharge to Tier II waters that will result in a new, or an increased, permitted annual discharge of pollutants and a potential impact to water quality, shall evaluate alternatives to eliminate or reduce discharges or impacts." Satisfactory completion of the Tier II Antidegradation Review is required to receive numerous State permits, such as those for wastewater treatment, nontidal wetlands disturbance, waterways construction, and coverage under the general construction permit.

The Tier II review is applicable to all portions of the project within the Tier II watershed of **McIntosh Run 2**. The Review consists of (1) a no-discharge alternatives analysis which considers if the activity can avoid any impacts to Tier II waters, i.e., an alternative site or strategic design, (2) a minimization alternatives analysis to limit associated water quality degradation, and potentially (3) a mitigation analysis to account for net loss of vital resources such as forest cover. If there is no assimilative capacity within the Tier II watershed identified above, additional social and economic justification for unavoidable

impacts is required. No assimilative capacity means that new water quality data indicates that the Tier II stream segment has degraded below Tier II standards.

To ensure that essential information is provided to MDE when conducting the Tier II Review, MDE has developed forms to assist applicants in completing the no-discharge alternatives analysis, minimization analysis, and mitigation analysis. Adequate completion of these forms and accompanying Tier II report is required to successfully satisfy the Review and is necessary for State permitting and other approvals. A Tier II report template, which uses the information from the completed forms, is also available to help with document formatting and information organization. There are some activities that may require MDE permitting and approval but may not warrant additional Tier II review. Applicants are encouraged to review the Tier II Determination of No Additional Review Form and its applicability to the project before proceeding with the more detailed review analysis explained below.

Determination of No Additional Tier II Review Form V1.1¹

1. Code of Maryland Regulations (COMAR) 26.08.02.04-2 (G(1)) states that “If a Tier II antidegradation review is required, the applicant shall provide an analysis of reasonable alternatives that do not require direct discharge to a Tier II water body (no-discharge alternative). The analysis shall include cost data and estimates to determine the cost effectiveness of the alternatives”.
2. This form is for the evaluation of land disturbing activities such as those requiring a nontidal wetlands or waterways construction permit, or a general stormwater construction permit (NOI), to demonstrate that:
 - a. the project is exempt from the no-discharge alternatives analysis; and
 - b. the project consists of minor, unavoidable impacts to on-site streams, including stream buffers averaging 100’; and
 - c. the project will not cause net forest loss in the affected Tier II watershed, or loss will be less than 1 acre; and
 - d. all impervious surfaces associated with the project are treated with environmental site design practices, with existing structures with remaining capacity.

Tier II No-Discharge Analysis Form V1.2:²

1. Code of Maryland Regulations (COMAR) 26.08.02.04-2 (G(1)) states that “If a Tier II antidegradation review is required, the applicant shall provide an analysis of reasonable alternatives that do not require direct discharge to a Tier II water body (no-discharge alternative). The analysis shall include cost data and estimates to determine the cost effectiveness of the alternatives”.

¹ https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_NoAdditionalReview_v1.1.pdf

²

https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_NoDischargeAnalysis_Form.pdf

2. For land disturbing projects that result in permanent land use change, this ‘no discharge’ analysis specifically evaluates the reasonability of other sites or alternate routes which could be developed to meet the project purpose, but are located *outside* of the Tier II watershed. Reasonability considerations, as applicable, may take into account property availability, site constraints, natural resource concerns, size, accessibility, and cost to make the property suitable for the project.
3. This analysis shall be performed regardless of whether or not the applicant has ownership or lease agreements to a preferred property or route.

Tier II Minimization Alternative Analysis Form V1.2:³

1. Code of Maryland Regulations (COMAR) 26.08.02.04-2 (G(3)) states that “If the Department determines that the alternatives that do not require direct discharge to a Tier II water body are not cost effective, the applicant shall: (a) Provide the Department with plans to configure or structure the discharge to minimize the use of the assimilative capacity of the water body”.
2. This form helps to ensure that water quality impacts due to the proposed project are comprehensively identified and minimized.
3. To demonstrate that appropriate minimization practices have been considered and implemented, applicants must identify any minimization practices used when developing the project, calculate major Tier II resource impacts, consider alternatives for impacts, and adequately justify unavoidable impacts.

Tier II Mitigation Analysis Form V1.0:⁴

1. Code of Maryland Regulations (COMAR) 26.08.02.04-2 (G(3)) states that “If the Department determines that the alternatives that do not require direct discharge to a Tier II water body are not cost effective, the applicant shall: (a) Provide the Department with plans to configure or structure the discharge to minimize the use of the assimilative capacity of the water body”.
2. No net change in Tier II water quality is the overarching goal of the Tier II Review, and mitigation is an essential part of the analysis process to reduce cumulative degradation prior to justification of unavoidable impacts.
3. This form helps to ensure that alternatives to mitigate or offset unavoidable impacts to Tier II watersheds and streams are identified and properly implemented.
4. Mitigation and offsets are required before MDE can evaluate any social and economic justifications.

³ https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_Minimization_Form.pdf

⁴ https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_Mitigation_Form_v1.0.pdf

Construction Stormwater Antidegradation Checklist - Version 1.3⁵

1. To complete the checklist, applicants are required to coordinate with the County or appropriate approval authority when developing construction plans and stormwater management plans.
2. Applicants are required to provide this form when seeking a NOI/DOI for coverage under the General Permit for Stormwater Associated with Construction.
3. Applicants are required to submit a Tier II Letter of Completion before coverage under the General Permit for Stormwater Associated with Construction is granted.

McIntosh Run 2, which is located within the vicinity of the Project, has been designated as a Tier II stream. The Project is within the Catchment (watershed) of the segment. (See attached map).

Currently, there is assimilative capacity in this watershed; therefore at this time, no detailed social and economic justification is needed.

Planners should be aware of legal obligations related to Tier II waters described in the Code of Maryland Regulations (COMAR) 26.08.02.04 with respect to current and future land use plans. Information on the Antidegradation Policy can be obtained online at:
<https://dsd.maryland.gov/regulations/Pages/26.08.02.04.aspx>
and Tier II Waters are located at
<https://dsd.maryland.gov/regulations/Pages/26.08.02.04-2.aspx>

Planners should also note as described in the Code of Maryland Regulations (COMAR) 26.08.02.04-2(B), "Compilation and Maintenance of the List of High Quality Waters", states that "When the water quality of a water body is better than that required by water quality standards to support the existing and designated uses, the Department shall list the water body as a Tier II water body. *All readily available information may be considered to determine a listing. The Department shall compile and maintain a public list of the waters identified as Tier II waters.*"

Additional Tier II resources are available on the Maryland's High Quality Waters (Tier II) website:
https://mde.maryland.gov/programs/water/tmdl/waterqualitystandards/pages/antidegradation_policy.aspx.

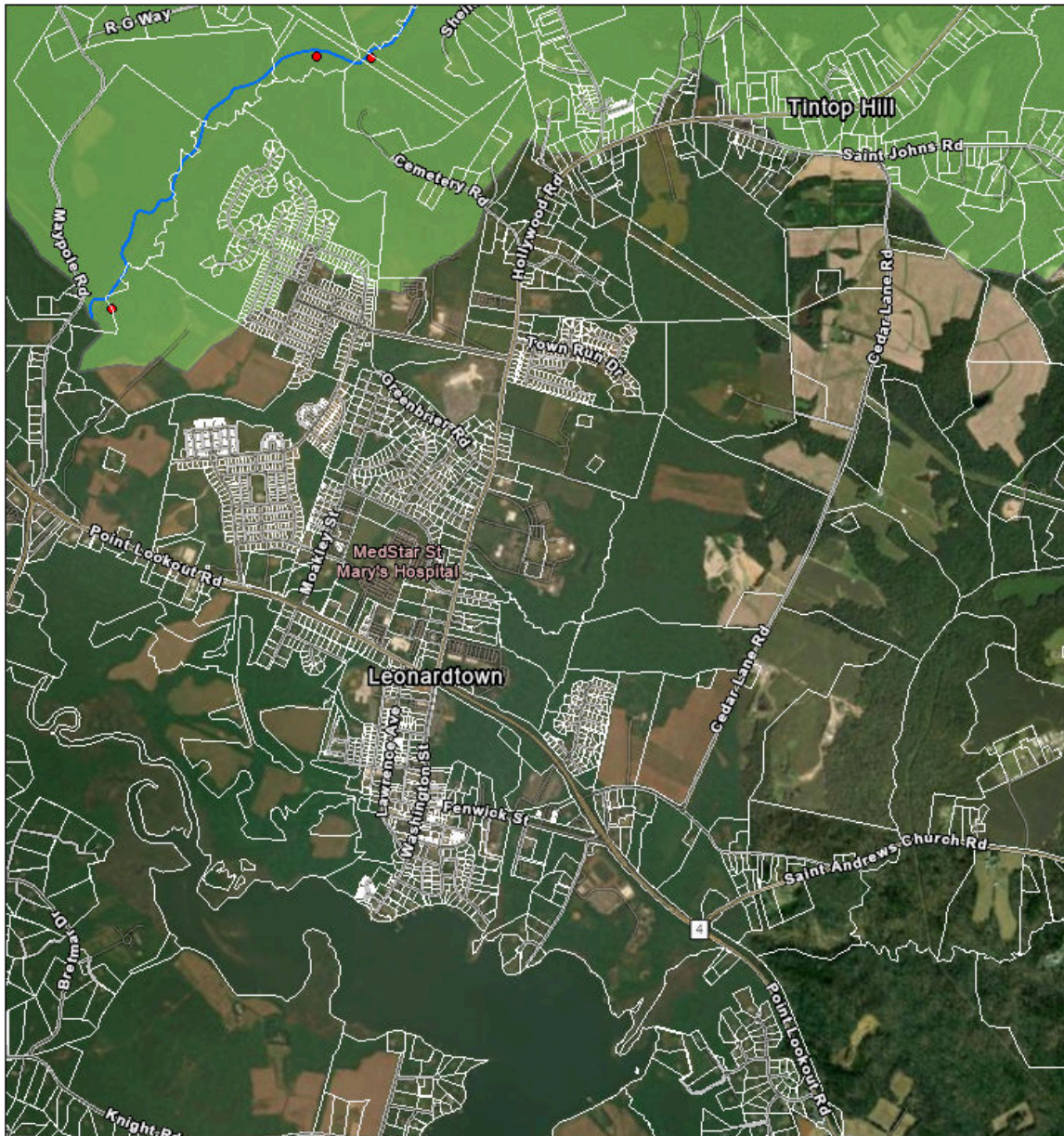
The public list is available in PDF from the following MDE website:
http://mde.maryland.gov/programs/Water/TMDL/WaterQualityStandards/Documents/Tier_II_Updates/Antidegradation-Tier-II-Data-Table.pdf.

⁵ <https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/Antidegradation-Checklist.pdf>

The interactive Tier II webmap is located at the following website:
(<https://mdewin64.mde.state.md.us/WSA/TierIIWQ/index.html>).

Direct any questions regarding the Antidegradation Review to Angel Valdez via email at angel.valdez@maryland.gov, or by phone at 410-537-3606.

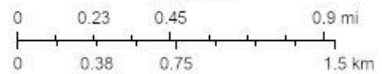
McIntosh Run 2 - MD20250110-0014



1/13/2025, 2:16:34 PM

1:36,112

- MD_ParcelBoundaries - Parcel Boundaries
- Tier II AC Catchments 2022
 - Assimilative Capacity Remaining
 - No Assimilative Capacity Remaining
- Tier II Stream Segments 2022
- Tier II Baseline Stations 2022
- Maryland County Boundaries



VGIN, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI, NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS, Creator: Maryland Department of the Environment, Water and Science Administration (MDE WSA), MDE, Maxar.

Flooding:

Please be advised, the property or properties in MD20250110-0014 is/are in close proximity to Flood Zone A, AE (100-year Floodplain), and X (500-year Floodplain). The project coordinator(s) should follow local floodplain ordinances and Federal Emergency Management Agency's guidelines and standards.

It is advised that the coordinator(s) consider climate resiliency, which could include but not limited to the following steps (<https://toolkit.climate.gov/>):

- Explore Hazards: Identify climate and non-climate stressors, threats, and hazards and how they could affect assets (people and infrastructure).
- Assess vulnerability and risks: Evaluate assets vulnerability and estimate the risk to each asset.
- Investigate options: Consider possible solutions for your highest risks, check how others have responded to similar issues, and reduce your list to feasible actions.
- Prioritize and plan: Evaluate costs, benefits, and capacity to accomplish each action integrating the highest value actions into a stepwise plan.
- Take action: Move forward with your plan and check to see if your actions are increasing your resilience with monitoring.

The coordinator(s) is advised to contact Dave Guignet, State National Flood Insurance Program Coordinator, of MDE's Stormwater, Dam Safety, and Flood Management Program, at (410) 537-3775 for additional information regarding the regulatory requirements for Floodplains and Storm Surges.

The coordinator(s) is advised to contact Matthew C. Rowe, CC-P, Deputy Director of MDE's Water and Science Administration, at (410) 537-3578 for additional information regarding Climate Change and Resiliency.



MDE Comments for Environmental Clearinghouse Project Local Plan Review: Town of Leonardtown 2025 Comprehensive Plan Draft

Response Code: R-1

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land and Materials Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Solid Waste Program should be contacted directly at (410) 537-3315 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
5. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please Land Restoration Program at (410) 537-3437.
6. Borrow areas used to provide clean earth back fill material may require a surface mine permit. Disposal of excess cut material at a surface mine may requires site approval. Contact the Mining Program at (410) 537-3557 for further details.

January 23, 2025

Mr. Carter Reitman
Lead Housing Planner
Maryland Department of Planning
120 E. Baltimore Street, Suite 2000
Baltimore, MD 21202

Dear Mr. Reitman:

Thank you for the opportunity to review and comment on the January 2025 Draft Comprehensive Plan for the Town of Leonardtown (the "Plan"). When reviewing plans, the Maryland Department of Housing and Community Development ("DHCD") comments on items for which political subdivisions can strategically leverage DHCD's resources to accomplish their housing and community development goals. DHCD also reviews comprehensive plans for consistency with relevant statutes and, if appropriate, Sustainable Communities Plans.

Overall, DHCD staff were impressed with the quality of the Plan. Staff in the DHCD Division of Neighborhood Revitalization reviewed the Plan and provided the following comments, which are meant to help realize the Plan's goals. We present the following in no particular order:

1. The housing and economic development components of the Plan are consistent with and build upon the Sustainable Communities Plan.
2. The Plan identifies a goal to support the vitality of its downtown. DHCD's Maryland Facade Improvement Program (MFIP) provides funding for aesthetic improvements to the exteriors of businesses located in Maryland's Sustainable Communities in order to stimulate local economic activity and support community development. Planning staff can learn more about MFIP online at <https://dhcd.maryland.gov/Communities/Pages/StateRevitalizationPrograms/MFIP.aspx> or by contacting Ms. Jean Cannon, our regional project manager for St. Mary's County.
3. The Plan does not show that the Town of Leonardtown has conducted a point-in-time count to identify the total number of people experiencing homelessness in Leonardtown, and the Plan does not identify goals or actions regarding services for people experiencing homelessness. For information on DHCD's programs addressing homelessness, please see more online at <https://dhcd.maryland.gov/HomelessServices/Pages/GrantFunding.aspx> or contact the Homelessness Solutions Program Manager, Suzanne Korff, at 410-209-5850 or Suzanne.Korff@maryland.gov.

4. The Plan identifies the community's needs with respect to income and poverty. The Town of Leonardtown, or non-profits active in Leonardtown may be eligible to apply for discretionary Community Services Block Grant (CSBG) funds administered by DHCD in order to provide services for low-income individuals and families at or below 125% of poverty. Planning staff can learn more about CSBG programs online at <https://dhcd.maryland.gov/Communities/Pages/programs/CSBG.aspx> or contact the Poverty Solutions Team at 301-429-7525 or csbg.dhcd@maryland.gov.
5. The Plan identifies a need for affordable housing, including workforce and low-income housing. Leonardtown currently has a 36-unit senior housing development (New Towne Village). If planning staff want to support further affordable housing development with Low income Housing Tax Credits (LIHTC) or other DHCD programs, information is available online at <https://dhcd.maryland.gov/HousingDevelopment/Pages/lihtc/default.aspx> or contact Edward Barnett, Director of Rental Lending, at 301-429-7740 or edward.barnett@maryland.gov.
6. Leonardtown's downtown was designated as a Maryland Main Street on September 14, 2023. More information on the revitalization benefits associated with this designation can be found online at <https://dhcd.maryland.gov/communities/pages/programs/mainstreet.aspx>.
7. The Plan identifies a need to support businesses in the Town's core. Info on DHCD's support for businesses can be found online at <https://dhcd.maryland.gov/Business/Pages/SmallBusinesses.aspx> or by contacting Mike Haloskey, Director of Business Lending Programs, at 301-429-7523 or Michael.Haloskey@maryland.gov.
8. The Plan identifies a need for infrastructure improvements that increase overall safety. DHCD's Community Health and Safety Works program is a potential resource to support these projects. More information on the program can be found online at <https://dhcd.maryland.gov/Communities/Pages/csw/default.aspx> or by contacting Christine McPherson, Deputy Director, at christine.mcpherson@maryland.gov. An additional resource for public facilities and infrastructure improvements is the Local Government Infrastructure Finance Program. More information about the program can be found online at <https://dhcd.maryland.gov/Communities/Pages/lgif/default.aspx> or by contacting Charles Day, 301-429-7891 charles.day@maryland.gov.
9. The Plan identifies a need to increase energy efficiency for buildings, including single-family and multifamily homes. DHCD has several programs that support energy efficiency, and more information on those programs can be found online at <https://dhcd.maryland.gov/Pages/EnergyEfficiency/default.aspx>.



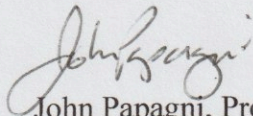
10. The Plan identifies a need to fill vacant commercial properties. DHCD's Project Restore can be leveraged to attract and retain businesses that occupy vacant properties. More information on the program can be found online at <https://dhcd.maryland.gov/Pages/ProjectRestore/default.aspx> or by contacting Kristin Dawson at 410-209-5847 or kristin.dawson@maryland.gov.
11. The Plan's Housing Element does not include an assessment of fair housing. Maryland House Bill 90 (2021) requires, effective January 1, 2023, that comprehensive plans include an assessment of fair housing. For technical assistance in development of the Plan's Housing Element, please contact staff at the Maryland Department of Planning.

Comments on specific action items outlined in the Plan are below:

- Action items 1.5 & 1.8 (page 34): as plans become more flushed out there may be opportunities for Maryland State Revitalization Programs to help fill funding gaps for dog park and county owned recreation facilities
- Action item 2.2 (page 35) – Maryland State Revitalization Programs are a potential funding source as the Leonardtown Wharf continues to be revitalized
- Action item 1.3 (page 39) Maryland State Revitalization Programs are potential resources for help support of aging in place rehab program
- Action item 2.5 (page 39) Maryland State Revitalization Programs are potential resources if Town able to foster partnership with private developers and help fill gap with Low Income Housing Tax Credits for development costs and State Revitalization Programs for predevelopment costs
- The Town should consider partnerships through the Seed Community Development Anchor Institution Fund, <https://dhcd.maryland.gov/Communities/Pages/StateRevitalizationPrograms/seed.aspx> to support affordable housing and community development initiatives.

We in the Division of Neighborhood Revitalization look forward to continuing our productive partnership with Leonardtown in its future initiatives. Again, thank you for the opportunity to comment on the Plan. If you have any questions regarding the comments above, please contact me at john.papagni@maryland.gov or 301-429-7670.

Sincerely,



John Papagni, Program Officer
Division of Neighborhood Revitalization

Cc: Joseph Griffiths, Maryland Department of Planning
Rita Pritchett, Maryland Department of Planning
Jean Cannon, Maryland Department of Housing and Community Development





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: MD DNR review of Leonardtown Comp Plan

To: Carter Reitman
 cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on the Draft Leonardtown Comprehensive Plan. The draft document was distributed to appropriate contacts at the Maryland Department of Natural Resources and reviewed. DNR's Wildlife and Heritage Service, Resource and Assessment Service, and Fishing and Boating Service have provided the following comments:

This plan does a decent job of summarizing the sensitive natural resources in the vicinity of Leonardtown and incorporates many action items on Page 70 that, if implemented, should go a long way towards protecting aquatic resources within McIntosh Run and its tributaries. However, the description of Breton Bay Watershed only includes a list of the rare species of McIntosh Run Watershed (pg 50). This table should be updated to be the current list of RTE species for the Breton Bay Watershed:

Common Name	Scientific Name	Status
Dwarf Wedgemussel	<i>Alasmidonta heterodon</i>	Federal Endangered
Sharpscale Sedge	<i>Carex oxylepis</i>	Highly Rare
Flier	<i>Centrarchus macropterus</i>	In Need of Conservation
Red Turtlehead	<i>Chelone obliqua</i>	Threatened
Arrowhead Spiketail	<i>Cordulegaster obliqua</i>	Rare
Eastern Narrow-mouthed Toad	<i>Gastrophryne carolinensis</i>	Endangered
Bald Eagle	<i>Haliaeetus leucocephalus</i>	Watch list
Selys' Sundragon	<i>Helocordulia selysii</i>	Threatened
Carolina Satyr	<i>Hermeuptychia sosybius</i>	Rare
Few-flowered Tick-trefoil	<i>Hylodesmum pauciflorum</i>	Endangered
Deciduous Holly	<i>Ilex decidua</i>	Rare
Warmouth	<i>Lepomis gulosus</i>	Watch list
Large-seed Forget-me-not	<i>Myosotis macrosperma</i>	Watch list
Comely Shiner	<i>Notropis amoenus</i>	Watch list
Treetop Emerald	<i>Somatochlora provocans</i>	Endangered
Climbing Dogbane	<i>Thyrsanthella difformis</i>	Endangered

The Natural Heritage Program recommends adding text to Sensitive Areas Element (pg 64) that explains that wetlands along McIntosh Run are designated and regulated by MDE as wetlands of special state concern in recognition of the statewide ecological significance of this riparian area. While the designation of McIntosh Run as a Tier II stream and catchment area are referenced in this section, it would be helpful to address the importance of avoiding degradation of water quality and aquatic habitat as mandated in MDE regulations either in this section or one of the other sections related to water quality or TMDLs.

Riparian buffers should be created or widened along streams that harbor important ecological and recreational resources to help protect and enhance the current habitat conditions. Town planners should consider adopting a minimum 100ft buffer along each bank where possible and 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 should be included in riparian reforestation plans to reduce impacts from invasive plant and animal species that could reduce tree survival and growth. The MD Forest Service encourages the town to consider partnering with Garrett County to better learn from them about how to utilize best management practices with respect to buffers.

In the section on Habitats of Threatened and Endangered Species (pg 67), the current text reads:

“There is a current population of the Dwarf Wedge Mussel (*Alasmidonta Heterodon*) in McIntosh Run, north of Leonardtown which could extend into smaller tributaries of McIntosh Run. The Dwarf Wedge Mussel is a state endangered species. There are also records of the *Chelone oblique*, or Red Turtlehead, in wetlands to the west of Leonardtown. The Red Turtlehead plant has been classified as a state threatened species by the Maryland Natural Heritage Program.”

Wildlife and Heritage recommend this should be updated to read:

“There is a current population of the Dwarf Wedgemussel (*Alasmidonta heterodon*) in McIntosh Run, along the western edge of Leonardtown which could extend into smaller tributaries of McIntosh Run. The Dwarf Wedgemussel is listed by both the state and the U.S. Fish and Wildlife Service as an endangered species. There are also records of the *Chelone obliqua*, or Red Turtlehead, in wetlands to the west of Leonardtown. The Red Turtlehead plant has been classified as a state threatened species by the Maryland Department of Natural Resources (DNR). Other rare species found in the wetlands west and southwest of Leonardtown include Deciduous Holly (*Ilex decidua*, state rare), Climbing Dogbane (*Thyrsanthella difformis*, state endangered), and two species of dragonflies: Arrowhead Spiketail (*Cordulegaster obliqua*, state rare) and Treetop Emerald (*Somatochlora provocans*, state endangered). Forested wetlands along Town Run provide habitat for Selys' Sundragon (*Helocordulia selysii*), a dragonfly listed as threatened by DNR. About 645 acres along McIntosh Run and Town Run, including 130 acres in the Critical Area, have been identified as Ecologically Significant Areas for the protection of the habitats of these rare, threatened, and endangered species.”

We recommend this table should be updated as well:

Rare, Threatened, and Endangered Species of Leonardtown

Scientific Name	Common Name	Status
<i>Alasmidonta heterodon</i>	Dwarf Wedgemussel	Federal Endangered
<i>Chelone obliqua</i>	Red Turtlehead	Threatened

<i>Cordulegaster obliqua</i>	Arrowhead Spiketail	Rare
<i>Helocordulia selysii</i>	Selys' Sundragon	Threatened
<i>Ilex decidua</i>	Deciduous Holly	Rare
<i>Somatochlora provocans</i>	Treetop Emerald	Endangered
<i>Thyrsanthella difformis</i>	Climbing Dogbane	Endangered

MD DNR's Fisheries Ecosystem Assessment Division reviewed and provided comments on the projected impacts of planned development. They provide the following comments:

- The plans to develop a hotel and conference center on the Tudor Hall Farm property and residential development on the same property will have an impact on the amount of impervious surface (IS) in the watershed. In order to maintain healthy fish communities, the goal for the watershed should be a target IS of 5% and structures per acre (C/ac) of 0.13 C/ac for development. The Breton Bay watershed is at 6.4% IS and 0.18 C/ac which is above the safe target and below the threshold (IS of 10% and 0.34 C/ac) for increasingly intractable aquatic habitat issues. Development levels between target and threshold may show a negative response in the fish community. Once the development exceeds the threshold, significant negative impacts on the fish communities are shown to occur. The additional proposed development of this area is projected to increase IS to 8.2% and 0.26 C/ac by 2037. The recommendation would be to preserve as much land as possible to minimize the increase in IS. Development of the Tudor Hall Farm property may have impacts on sensitive species located in the adjacent stream and wetlands
- The current impervious surface for the town limits of Leonardtown is 21.9% and structures per acre is 0.42. The addition of the proposed development by 2037 is projected to increase the IS to 27.8% and structures per acre to 0.59. The elevated IS can lead to negative impacts on the fish communities of the upper part of the Breton Bay subestuary. Bottom dissolved oxygen threshold of 3.0 mg/L is the minimum value for aquatic organisms, the target is 5.0 mg/L. Division sampling in the summer from 2003 to 2005 indicated bottom dissolved oxygen for the site near Leonardtown (Site 1) was below 3.0 mg/L for 22% of the samples. Site 2 (next downstream site) was below 3.0 mg/L for 42% of the samples. The two sites that were further down the subestuary (Sites 3 and 4) were below 3.0 mg/L for 5% and 0%, respectively, of the samples. The elevated impervious surfaces from the town appear to have been impacting bottom DO values from 2003-2005 and increased development will not improve the situation..
- McIntosh Run that flows into Breton Bay is an important spawning location for Yellow Perch. Additional development could impact their spawning success.
- Waste Water Treatment Plant expansion in 2025 will increase capacity and will be able to accommodate expanded build-out growth. This will help prevent the expansion of the use of septic systems which will help with some of the issues with fish habitat. However, it also leads to increased development that will put further stress on stormwater issues because the growth can be accommodated. There should be careful thought given to the trade-off in growth and ecological health of Breton Bay. Additional development beyond the planned areas will be required to pay for upgrades to the wastewater treatment plant. Coordination with the county should be implemented to control growth in the watershed outside of town limits.
- Municipal growth will use a smart growth strategy to concentrate development adjacent to existing developed areas. This will help keep important forest and agricultural lands intact. 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 will be necessary. The plan to preserve open space around the development is also important.

Finally, the Maryland Forest Service recommends implementing a Forestry Program. MD Forest Service would like to promote the State Forest Action plan and feels that the community could benefit from the addition of a

town Forestry Conservation Ordinance and Tree Care Ordinance. 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. We would recommend joining if possible. Maryland PLANT Award has similar criteria to Tree City USA and reading through this plan have concluded Leonardtown would be a good candidate for that as well. Maryland Forest Service can also help identify sites and programs that can assist with this effort. 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



Carter Reitman -MDP- <carter.reitman2@maryland.gov>

CAC Comments on Leonardtown Comp Plan

Michael Macon -DNR- <michael.macon2@maryland.gov>
To: Carter Reitman -MDP- <Carter.Reitman2@maryland.gov>
Cc: Charlotte Shearin -DNR- <charlotte.shearin@maryland.gov>

Wed, Jan 22, 2025 at 11:18 AM

Hey Carter,

I'm a planner with the Critical Area Commission. I've reviewed Leonardtown's Comprehensive Plan on behalf of the commission. At this time, we have no comments on the plan. I hope this email will be sufficient for your record of agency comments.

Thanks and have a great day.
-Michael Macon



Critical Area Commission
Chesapeake & Atlantic Coastal Bays
dnr.maryland.gov/criticalarea

Michael Macon
Natural Resource Planner
[1804 West Street, Suite 100](#)
[Annapolis, MD 21401](#)
667-408-0286 (cell)
410-260-3467 (office)
Michael.Macon2@maryland.gov

February 10, 2025

Mr. Carter Reitman
Maryland Department of Planning
120 E. Baltimore St
Suite 2000
Baltimore MD 21201

Dear Mr. Reitman:

Thank you for coordinating the State of Maryland's comments on the Draft Town of Leonardtown Comprehensive Plan, hereafter referred to as "the Plan". The Maryland Department of Transportation (MDOT) offers the following comments.

General Comments

- In general, the Plan is consistent with MDOT plans and programs, and MDOT supports the Plan's vision to enhance more than just highway and street capacity by accommodating various modes of transportation, including walking, cycling, low speed vehicles, transit, and potential ferry services (Page 72). The MDOT encourages the planning and development of new and complete supporting infrastructure such as sidewalks, multi-use trails, bike lanes, and other multi-modal pathways to facilitate innovative local and regional travel methods to make new growth in Leonardtown accessible to all road users.
- The MDOT supports the Town's efforts to "connect scattered employment and shopping centers" while recognizing the importance of the downtown core's dependence on state highway access. The MD Route 5 and MD Route 245 needs that are identified in the Plan may bring opportunities for new traffic calming, sidewalks, bike paths, street lighting, crosswalks, and pedestrian amenities that can support future growth. Please coordinate with Ms. Sina Zabihi, Design Engineer, Office of Planning and Preliminary Engineering, Maryland State Highway Administration (SHA), at 410-545-0300, or via email at SZabihi2.consultant@mdot.maryland.gov.

- The MDOT is encouraged by the Plan's recommendations to improve transit service in and around Leonardtown, which is served by the St. Mary's Transit System (STS). As mentioned in the Plan, the STS connects the area residents and visitors to important locations for commerce, government, schools, healthcare facilities, and regional hubs like Lexington Park and the College of Southern Maryland. For local transit planning and support, please contact Mr. Bruce Hojnacki (410-767-3758) or bhojnacki@mdot.maryland.gov. For general and regional planning questions, please contact Mr. Stephen P. Miller, MTA Strategic Planner, at 410-767-3869 or SMiller6@mdot.maryland.gov.
- Transportation Alternatives Program (TAP) is a reimbursable, federally funded program for local sponsors to complete transportation enhancement projects designed to strengthen the intermodal transportation system. Examples include capital improvements including sidewalks, roadways, lighting, undergrounding of utilities, drainage and sewer improvements, streetscapes, trails, parking artwork enhancements, building construction, and museum enhancements. For further information contact Ms. Christy Bernal, TA Program Manager, MDOT SHA at 410-545-5675, or via email at cbernal@mdot.maryland.gov.
- Commuter Choice Maryland is MDOT's Travel Demand Management (TDM) program, and it could be incorporated into the Plan as a strategy to support the Plan. The program offers an extensive menu of commuter transportation services, such as ridesharing. Please visit www.CommuterChoiceMaryland.com for more information, and for local rideshare and commuter benefits information and coordination, please contact Ms. Nikki Trasmonte via email at ntrasmonte@mdot.maryland.gov.
- The Infrastructure Investment and Jobs Act (IIJA) (Public Law No: 117-58), also known as the Bipartisan Infrastructure Law (BIL), signed into law on November 15, 2021, is a \$1.2 trillion investment in our nation's infrastructure intended to rebuild America's roads, bridges and rails, upgrade and expand public transit, modernize the nation's ports and airports, improve safety, address the climate crisis, advance environmental justice, and invest in communities that have too often been left behind. The MDOT is publishing a list of IIJA grants and Notices of Funding Opportunity (NOFOs) that are released by a federal agency to announce program specific funding availability. Applicants should consult program-specific guidance in the NOFO and identify priorities and key projects for your community, transportation, or otherwise.

For information, please visit the MDOT Federal Discretionary Grants web page: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?Pageid=156>. For assistance, please contact Mr. Sean Winkler, Federal Infrastructure Strategy Manager, at 410-865-1158, or via email at swinkler@mdot.maryland.gov.

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- The Recreational Trails Program is a federally funded program SHA administers on a reimbursement basis. Like the TA Program, the Recreational Trails Program may reimburse a local project sponsor up to 80 percent of the project's total eligible costs to develop community-based, motorized, and non-motorized recreational trail projects. For further information on these resources please visit: <https://roads.maryland.gov/mdotsha/pages/Index.aspx?Pageld=98>, or contact Ms. Meg Young, Planner, Deputy Director for Active Transportation and Micromobility, at 410-865-1087, or via email at myoung7@mdot.maryland.gov.
- The MDOT's Kim Lamphier Bikeways Network Program allocates State transportation funds administered by the MDOT Secretary's Office (TSO) to promote biking as an alternative transportation mode. For further information on these resources please visit <https://www.mdot.maryland.gov/tso/pages/Index.aspx?Pageld=24>, or email MDBikeways@mdot.maryland.gov.

Specific Comments

Page 78 – Action Item #4.2 - Enhance public access to the Town's waterfront along Breton Bay and McIntosh Run

Relative to MDOT implementing resilience strategies and initiatives to withstand the impacts of climate change on transportation infrastructure, please review SHA Climate Change Vulnerability Online ArcGIS web application map

<https://www.arcgis.com/apps/webappviewer/index.html?id=86b5933d2d3e45ee8b9d8a5f03a7030c>. The map showcases geospatial data products related to climate change and the potential impacts on State transportation infrastructure. The purpose of this application is to support efforts to avert and mitigate potential impacts of sea-level rise that result from global climate change on State roadway and bridge infrastructure.

Thank you again for the opportunity to review the Plan. If you have any questions or concerns, please do not hesitate to contact Mr. Dan Janousek, Regional Planner, MDOT Office of Planning, Programming, and Project Delivery (OPPPD) at 410-865-1098, toll free at 888-713-1414, or via email at djanousek@mdot.maryland.gov. Mr. Janousek will be happy to assist you.

Sincerely,



Geoff Anderson
Chief, OPPPD

cc: Ms. Kari Snyder, Regional Planner, OPPPD, MDOT

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bcc: Ms. Kandese Holford, Director of Active Transportation and Micromobility, MDOT
Ms. Rita Pritchett, Planner, Maryland Department of Planning
Ms. Francine Waters, Multimodal Transportation Project Specialist, MDOT
Mr. Sean Winkler, Manager, Federal Infrastructure Strategy, MDOT
Ms. Meg Young, Deputy Director for Active Transportation and Micromobility, MDOT