# Maryland DEPARTMENT OF PLANNING

February 3, 2025

Chris Thomas Chair, Town of St. Michaels Planning Commission 201 Boundary Lane, P.O Box 206, St. Michaels, MD 21663

Dear Mr. Thomas,

Thank you for the opportunity to comment on the draft Town of St. Michaels Comprehensive Plan Amendment (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, 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 hopes that St. Michaels considers the comments included in this review as a reflection of our desire to support St. Michaels in its comprehensive planning efforts and notes that our suggestions are intended to help further the implementation of state, county, and the town's own visions. MDP staff are available and eager to assist St. Michaels in any Draft Plan updates, including meeting the housing element requirements of HB1045 and HB90. 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 town's public hearing record. When the Draft Plan is adopted, please send Keith Lackie a PDF copy of the final document.

If you have any questions or concerns regarding these comments, please email MDP's Lower Eastern Shore Regional Planner, Keith Lackie at <a href="mailto:keith.lackie@maryland.gov">keith.lackie@maryland.gov</a>.

Sincerely,

Joe Griffiths, AICP

Director, Planning Best Practices

Enclosures: Review Comments Town of St. Michaels Draft Plan Amendment

cc: Alfred Mercier, Commission President, Town of St. Michaels

Steve Ball, Town Planner, Town of St. Michaels

Keith Lackie, Regional Planner for MDP, Lower Eastern Shore Region

Maryland Department of Planning • 120 E. Baltimore St., Suite 2000 • Baltimore • Maryland • 21202



# Maryland Department of Planning Review Comments Town of St. Michaels Draft 2024 Draft Plan Amendment

The Maryland Department of Planning (MDP) received the Draft 2024 St. Michaels Comprehensive Plan Amendment (Draft Plan) from the Town of St. Michaels on December 6, 2024. These comments are offered as suggestions to improve the Draft Plan and better address the statutory requirements of the Land Use Article. 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 the town.

#### **Draft Plan Summary**

This Draft Plan is a partial update to the adopted 2015 St. Michaels Comprehensive Plan. The Draft Plan reaffirms many of the sections of the 2015 plan but contains significant updates to the following chapters: land use; municipal growth and development regulations; water resources element; community facilities and public services; transportation and utilities; and associated maps.

## Maryland State Visions - Synopsis

Land Use Article Section 1-201 requires Maryland jurisdictions with planning & zoning authority to implement the state's 12 Planning Visions through the 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 Preface section of the Draft Plan (page 2, and 3) explains that the visions are incorporated in the 2024 Comprehensive Plan as fundamental goals which will be achieved through a variety of objectives, policies, principals, recommendations, and implementation techniques.

## **Municipality Minimum Planning Requirements**

Land Use Article (LUA) 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 the required plan elements and how the Draft Plan addresses them.

Checklist of Maryland Code (Land Use Article) Element Requirements for Non-Charter Counties					
and Municipalities					
Comprehensive Plan	MD Code	Additional MD Code	Reference		
Requirements	Reference	Reference			
(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.	Chapter 5: pages 1 - 9		
(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	Not specifically provided – incorporated within Draft Plan Chapters 3, 4, 8, and 14.		
(c) a goals and objectives element	L.U. § 3-102(a)(1)(iii)	L.U. § 3-110 Goals and objectives element	Not specifically provided – Incorporated as "objectives and implementation strategies" throughout Draft Plan Chapters		

(d) a housing element	L.U. § 3-102(a)(1)(iv)	<u>L.U. § 3-114 Housing element</u> SB-687(2021)	Chapter 10: pages 1 - 5
(d) a land use element	L.U. § 3-102(a)(1)(v)	L.U. § 3-111 Land use element	Chapter 1: pages 1 - 12
(e) a development regulations element	L.U. § 3-102(a)(1)(vi)	L.U. § 3-103 Development regulations element	Chapter 14: pages 1 - 4, Chapter 2, pages 1 - 18, and the implementation strategies throughout the Draft Plan
(f) a sensitive areas element	L.U. § 3-102(a)(1)(vii)	L.U. § 3-104 Sensitive areas element	Chapter 3: pages 1 - 9
(g) a transportation element	L.U. § 3-102(a)(1)(viii)	L.U. § 3-105 Transportation element	Chapter 6: pages 1 - 10
(h) a water resources element	L.U. § 3-102(a)(1)(ix)	L.U. § 3-106 Water resources element	Chapter 4: pages 1 - 12
(i) a mineral resources element, IF current geological information is available	L.U. § 3-102(a)(2)	L.U. § 3-107 Mineral resources element	Not applicable
(j) for municipalities only, a municipal growth element	L.U. § 3-102(a)(3)	L.U. § 3-112 Municipal growth element	Chapter 2: pages 1 - 18
(k) for counties only if located on tidal waters, a fisheries element	L.U. § 3-102(a)(4)	L.U. § 3-113 Fisheries element	Not applicable
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)	Not specifically provided, however consideration of (2).(b).(c).(d).(f) incorporated within various Draft Plan Chapters
(3) Visions A local jurisdiction SHALL through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	L.U. § 3-201(c)	L.U. § 1-201 The 12 Planning Visions	Preface and Draft Plan affirms 12 state visions as fundamental goals of the Draft Plan.
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		Chapter 1, page 7 and 12

#### Conformance with Section 3-102 of the Land Use Article

The following analyzes the Draft Plan as it relates to the requirements of the municipal comprehensive plan elements, in accordance with the Land Use Article (LUA). These comments specifically address those Draft Plan chapters that MDP has determined warrant additional information to demonstrate conformance to the LUA, and/or provide suggestions that may strengthen the Draft Plan.

# 1. Housing Chapter - Synopsis

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

# **Plan Analysis**

The housing chapter included in the Draft Plan is largely a history of housing challenges and existing

conditions of the town. Indeed, the Draft Plan indicates "[t]he housing issues in St. Michaels can be generally categorized as one of three problems: housing cost, housing quality, and housing availability" (Draft Plan, chapter 10, page 1). While the Draft Plan provides a few passing references to "affordable housing", such as the town's Sustainable Community Program, accessory dwelling units, and "[w]ork[ing] with Habitat for Humanity to build additional affordable single-family houses in St. Michaels" (Draft Plan, chapter 10, pages 3 -5), MDP believes that these paragraphs do not meet the requirement for a housing element as required by HB 1045 (2019). This bill requires comprehensive plans to address the need for affordable housing as a measurement Talbot County Area Median Income (AMI), including but not limited to workforce housing and low-income housing, as defined by statute. The current Talbot County AMI is \$106,500. MDP developed the Housing Data Dashboard to help jurisdictions calculate AMI affordability rates.

In addition, the housing chapter must also meet the requirements of HB 90 and include meaningful actions to affirmatively further fair housing (AFFH). The Draft Plan does not provide (or mention the need for) any "specific action" to address AFFH, nor the HB 90 requirements of a comprehensive plan housing element. The "specific action" language in Land Use Article 3-114 means that jurisdictions are free to determine the best action to apply locally, but that actions are still required. MDP also developed guidance and resources for jurisdictions to use to address fair housing requirements in their housing elements.

MDP has developed tools and guidance to assist jurisdictions with developing the housing chapter, meeting the housing element requirements, and suggests the town confer with its municipal attorney on whether the Draft Plan meets the requirements of LUA Section 3-114.

# 2. Sensitive Areas Chapter – Synopsis

The sensitive areas chapter 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 chapter data provisions and review responsibilities to the Maryland Departments of the Environment and Natural Resources.

#### **Plan Analysis**

No substantive changes to the sensitive areas chapter from the 2015 Comprehensive Plan are included, however the Draft Plan does recognize that "[t]he Climate Change and Sea Level Rise Commission has a variety of projects that they are currently working on to mitigate sea level rise and flooding" (Draft Plan, chapter 3, page 5) and references the Draft Plan Chapter 13. Climate Resilience.

# 3. Transportation Chapter - Synopsis

The transportation chapter 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**

While MDP notes the Draft Plan has several laudable transportation implementation "Objectives and Implementation Strategies", MDP recommends that several statements in the Transportation Chapter are worthy of providing specific "Implementation Strategies":

- Conduct a comprehensive pedestrian circulation, parking and wayfinding signage study to target specific improvements and more closely evaluate pedestrian circulation through town (chapter 6, page 4);
- Construct a new sidewalk between the Inn of Perry Cabin to the main commercial area of town (chapter 6, page 3);
- Study and control vehicle speed on residential streets and alleys (chapter 6, page 2); and,

• Conduct an American Disability Act (ADA) accessibility management study to ensure people with disabilities have appropriate access to buildings and public spaces throughout town (chapter 6, page 4).

The Draft Plan addresses the current transit service information for the town, therefore MDP recommends the Draft Plan include an objective to continue supporting the public transit service. A high percentage of the town population is aged 50 and over, which is a cohort in need of access to transit.

# 4. Water Resources Element Chapter - Synopsis

The Water Resources 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 WRE, ensuring consistency with MDE programs and goals.

### **Plan Analysis**

The WRE indicates there will be sufficient and excess water and sewer capacity to meet projected future demand for the in-town build-out scenario and potential annexation development. Non-residential uses are mentioned in the water section, but no specific usage/demand is listed, and non-residential demand for sewer is not mentioned. Has the town considered non-residential demand for sewer, and has the town calculated demand metrics for non-residential uses that can be included in the WRE analysis discussion?

The water capacity/demand discussion on Table 4.1 (Draft Plan, chapter 4, page 5) indicates 24 potential annexation area dwelling units; however, chapter 4, page 6, indicates 49 units. These two different numbers should be reconciled.

MDP notes that the St. Michaels Waste Water Treatment Plant (WWTP) has provided (or committed to provide) public sewer capacity to several hundred properties that are located outside of the municipal boundary, yet neither the WRE chapter nor the Community facilities and Public Services Chapter have objectives, implementation strategies, or policies to address this issue. Indeed, the Municipal Growth and Development Regulations Chapter (Draft Plan, chapter 2, page 10) provides narrative related to "burdens on municipally provided services and infrastructure lying beyond proposed municipal growth area" (more specifically, burdens to the St. Michaels WWTP), yet this chapter does not provide any "Objectives and Implementation Strategies" to address this important matter. These WWTP commitments to non-municipal properties are principally derived from Talbot County Water and Sewer Plan (WSP) amendments, resolution numbers 235 and 250. MDP further notes that the Talbot County Department Advisory Board is in the process of drafting a "Talbot County Sanitary District Sewer Connection Policy" that is intended to provide several additional non-municipal properties with public sewer service (many of which are intended to be served by the St. Michaels WWTP). MDP recommends that the Draft Plan contemplate these (existing and intended) sewer capacity commitments of the St. Michaels WWTP and provide specific "Objectives and Implementation Strategies" in furtherance of town/county collaboration.

# 5. Growth Tiers – Analysis

The Town of St. Michaels Growth Tiers Map for SB 236 (Adopted Sept. 24, 2012) was incorporated in the town's 2015 Comprehensive Plans Map 1-3 and was therefore considered adopted as of 2015. The addition of what appears to be one parcel to Tier 1 is reflected in the new Growth Tier Map (in the central southwestern portion of the town). This parcel has been annexed since the previous growth tier map. All other Tiers appear to be consistent with the 2012/2015 map.

# **6.** Climate Resilience Chapter – Analysis

MDP commends the town for addressing updated climate resiliency strategies, including stormwater management improvements. MDOT manages federal climate resilience funding programs and assists local jurisdictions to implement transportation-related climate resilience projects, see <a href="MDOT ClimateFocused Funding Portal">MDOT Climate Focused Funding Portal</a>.

# Maryland Department of Planning Review Comments Draft Plan

# 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 the Town of St. Michaels as soon as possible.

# **Attachments**

Page 8: Maryland Department of Maryland Department of Housing and Community

Development

Page 11: Maryland Department of Natural Resources

Page 12: Maryland Department of Transportation



WES MOORE
Governor
ARUNA MILLER
Lt. Governor
JACOB R. DAY
Secretary
JULIA GLANZ
Deputy Secretary

December 23, 2024

Mr. Keith Lackie Regional Planner, Lower Eastern Shore Maryland Department of Planning 120 E. Baltimore Street, Suite 2000 Baltimore, MD 21202

Dear Mr. Lackie,

Thank you for the opportunity to review and comment on the Draft Updated St. Michaels Comprehensive Plan (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 which we found to be thoughtful and well written. 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.
- The Plan identifies a need to revitalize the community through adaptive reuse for which
  the DHCD's Community Legacy Program grants could assist. Planning staff can learn
  more about Community Legacy online at
  <a href="https://dhcd.maryland.gov/Communities/Pages/programs/CL.aspx">https://dhcd.maryland.gov/Communities/Pages/programs/CL.aspx</a> or contact Garland
  Thomas at 410-209-5810 or garland.thomas1@maryland.gov.
- 3. 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 <a href="https://dhcd.maryland.gov/Communities/Pages/StateRevitalizationPrograms/MFIP.aspx">https://dhcd.maryland.gov/Communities/Pages/StateRevitalizationPrograms/MFIP.aspx</a> or by contacting Garland Thomas at 410-209-5810 or <a href="mailto:garland.gov/communities/pages/stateRevitalizationPrograms/MFIP.aspx">https://dhcd.maryland.gov/communities/Pages/StateRevitalizationPrograms/MFIP.aspx</a> or by contacting Garland Thomas at 410-209-5810 or <a href="mailto:garland.gov/communities/pages/stateRevitalizationPrograms/mryland.gov/communities/pages/stateRevitaliza





- 4. The Plan identifies an aging population as a rising demographic in the town. DHCD can assist with home repairs to help seniors age in place with improved comfort, livability, and accessibility for homeowners through its Special Loan Programs. Planning staff and residents can learn more about these programs at <a href="https://dhcd.maryland.gov/Residents/Pages/SpecialLoans.aspx">https://dhcd.maryland.gov/Residents/Pages/SpecialLoans.aspx</a> or contact the program directly at 301-429-7409 or <a href="mailto:DHCD.SpecialLoans@maryland.gov">DHCD.SpecialLoans@maryland.gov</a>.
- 5. The Plan does not show that St. Michaels has conducted a point-in-time count to identify the total number of people experiencing homelessness in St. Michaels, 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 <a href="https://dhcd.maryland.gov/HomelessServices/Pages/GrantFunding.aspx">https://dhcd.maryland.gov/HomelessServices/Pages/GrantFunding.aspx</a> or contact the Homelessness Solutions Program Manager, Suzanne Korff, at 410-209-5850 or <a href="maintenant-suzanne.Korff@maryland.gov">Suzanne.Korff@maryland.gov</a>. Persons experiencing homelessness who need assistance should call 1-888-407-8018.
- 6. The Plan identifies the community's needs with respect to income and poverty. St. Michaels or non-profits active in St. Michaels may be eligible to apply for discretionary Community Services Block Grant (CBSG) 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 CBSG programs online at <a href="https://dhcd.maryland.gov/Communities/Pages/programs/CSBG.aspx">https://dhcd.maryland.gov/Communities/Pages/programs/CSBG.aspx</a> or contact the Poverty Solutions Team at 301-429-7525 or <a href="mailto:csbg.dhcd@maryland.gov">csbg.dhcd@maryland.gov</a>.
- 7. The Plan identifies a need for affordable housing, including workforce and low-income housing. A portion of St. Michaels is within a HUD Qualified Low-Income Housing Tax Credit (LIHTC) Census Tract and currently has one multifamily property financed with support from LIHTC, Riverwoods at St. Michaels. If Town staff want to support further affordable housing development with LIHTC or other DHCD programs, information is available online at <a href="https://dhcd.maryland.gov/HousingDevelopment/Pages/lihtc/default.aspx">https://dhcd.maryland.gov/HousingDevelopment/Pages/lihtc/default.aspx</a> or contact Edward Barnett, Director of Rental Lending, at 301-429-7740 or <a href="https://dww.default.aspx">edward.barnett@maryland.gov</a>.
- 8. A portion of is within a Maryland Mortgage Program ("MMP") target area and residents therefore have enhanced eligibility for the state's homeownership incentives. Planning staff and residents may learn more about Maryland's homeownership programs at <a href="https://mmp.maryland.gov/pages/default.aspx">https://mmp.maryland.gov/pages/default.aspx</a>.
- 9. St. Michaels downtown has not been designated as a Maryland Main Street, but could be considered for designation. More information on the revitalization benefits associated with this designation can be found online at <a href="https://dhcd.maryland.gov/communities/pages/programs/mainstreet.aspx">https://dhcd.maryland.gov/communities/pages/programs/mainstreet.aspx</a>.





- 10. 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 <a href="https://dhcd.maryland.gov/Business/Pages/SmallBusinesses.aspx">https://dhcd.maryland.gov/Business/Pages/SmallBusinesses.aspx</a> or by contacting Mike Haloskey, Director of Business Lending Programs, at 301-429-7523 or <a href="mailto:Michael.Haloskey@maryland.gov">Michael.Haloskey@maryland.gov</a>.
- 11. The Plan identifies a need for infrastructure improvements that support community revitalization and 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 <a href="https://dhcd.maryland.gov/Communities/Pages/csw/default.aspx">https://dhcd.maryland.gov/Communities/Pages/csw/default.aspx</a> or by contacting Eric Borchers, Project Manager, at 410-209-5833 or <a href="mailto:eric.borchers@maryland.gov">eric.borchers@maryland.gov</a>.
- 12. 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 <a href="https://dhcd.maryland.gov/Pages/EnergyEfficiency/default.aspx">https://dhcd.maryland.gov/Pages/EnergyEfficiency/default.aspx</a>.
- 13. 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 <a href="https://dhcd.maryland.gov/Pages/ProjectRestore/default.aspx">https://dhcd.maryland.gov/Pages/ProjectRestore/default.aspx</a> or by contacting Kristin Dawson at 410-209-5847 or kristin.dawson@maryland.gov.
- 14. 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.

We in the Division of Neighborhood Revitalization look forward to continuing our partnership with the Town of St. Michaels in its future initiatives. If you have any questions regarding the comments above, please contact me at <a href="mailto:john.papagni@maryland.gov">john.papagni@maryland.gov</a> or 301-429-7670.

John Papagni

Program Officer

State Revitalization Programs

Cc: Joseph Griffiths, Maryland Department of Planning
Rita Pritchett, Maryland Department of Planning
Garland Thomas, DHCD Division of Neighborhood Revitalization
Olivia Ceccarelli, DHCD Division of Neighborhood Revitalization







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 comments on St. Michael's draft Comprehensive Plan

To: Keith Lackie cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on the Draft Town St. Michael's Comprehensive Plan. The draft document was distributed to appropriate contacts at the Maryland Department of Natural Resources and reviewed. DNR offers the following comments:

Overall, the plan does a good job of limiting development to in town locations. There is some concern of future development in outlying areas that are currently agricultural land. Within the town, the additional housing units are not likely to exceed more than 100. There may be some impact on fish habitat with the additional impervious surfaces, but it is not likely to be significant since all units would be within town limits. The current wastewater system can handle any planned additional development in town. The Strausburg Farm Property is included in the agricultural and conservation estimate for the town, but this property is approved for a 10 lot subdivision. This area would require well and septic systems which could impact fish habitat. St. Michael's should make a concerted effort to conserve this property to protect fish habitat.

- San Domingo Creek Park This project looks like a great opportunity to reduce the amount of impervious surface both in town and along the creek (removal of multiple buildings, roads, and parking lots).
- Trail Access to Open Spaces DNR commends St. Michael's on its goals of providing more trail access
  to open spaces. An issue with a lot of trails is improper construction or lack of maintenance. Trails aren't
  a significant contributor to sediment and nutrients entering a waterway, but a trail not built properly can
  contribute to erosion and sediment entering a body of water. DNR recommends that St. Michahel's
  employ the best trail building practices and keep up with maintenance to limit erosion.
- Living shoreline Replacement of a bulkhead with a living shoreline is adequate in addressing some fish habitat issues. Using a living shoreline would be better than an established bulkhead for the shoreline.

Finally DNR recognizes the work that the town of St. Michaels put in, to increase the climate resilience of the town. Through the efforts of the Climate Change/ SLR commission and the various planning projects mentioned in Chapter 13 to identify priority areas and plan for climate change and sea level rise within the town.

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

Wes Moore Governor Aruna Miller Lieutenant Governor Paul J. Wiedefeld

January 9, 2025

Mr. Keith Lackie Maryland Department of Planning 120 E. Baltimore Street Suite 2000 Baltimore MD 21201

Dear Mr. Lackie:

Thank you for coordinating the State of Maryland's comments on the Draft Town of St. Michaels Comprehensive Plan 2024, 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 develop a comprehensive "pedestrian circulation, parking, and wayfinding signage study" to prepare for future growth in a manner that maintains and enhances alternative modes of transportation that will support the diverse community character of St. Michaels. All new growth in the Town of St. Michaels should be accessible to all road users.
- The MDOT supports the Town of St. Michaels' efforts to implement the Chesapeake Bay passenger ferry service. The MDOT encourages the Town of St. Michaels to work with the Maryland State Highway Administration (SHA) to identify potential ferry station sites and infrastructure needs. For opportunities for traffic calming, sidewalks, bike paths, street lighting, crosswalks, and pedestrian amenities that can support future growth and future ferry station sites, please coordinate with Ms. Sina Zabihi, Design Engineer, Office of Planning and Preliminary Engineering (OPPE), SHA, at 410-545-0300, or via email at SZabihi2.consultant@mdot.maryland.gov.
- The 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, trials, parking artwork enhancements, and building construction and museum enhancements. For further information contact Ms. Christy Bernal, TA Program Manager, SHA at 410-545-5675, or via email at cbernal@mdot.maryland.gov.

- The MDOT supports continued improvements to expand and enhance transit options. Please continue to coordinate with the Maryland Transit Administration (MTA) for the ongoing expansion of regional transit and the coordination of MDOT supported locally-operated transit services (LOTS). The MTA also supports park and ride (with SHA), demand response services, paratransit, medical services, and senior-center transportation options. For local transit planning and support, please contact Ms. Jennifer Vickery, MTA Program Manager at 410-767-4598, or via email at jvickery@mdot.maryland.gov. For general and regional transit planning questions, please contact Mr. Stephen P. Miller, Strategic Planner, MTA, at 410-767-3869 or SMiller6@mdot.maryland.gov.
- Commuter Choice Maryland is MDOT's Travel Demand Management (TDM) program, and it could be incorporated 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. For local rideshare and commuter benefits information and coordination, please contact Ms. Stacy King, MDOT TDM Specialist/Commuter Choice Maryland Program Manager, at 410-767-1279, or via email at sking8@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.

• 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?PageId=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 <a href="https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=24">https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=24</a>, or email MDBikeways@mdot.maryland.gov.
- Recommend adopting the 2023 Talbot County Highway Location reference for guidance on roadway identity. The Highway Location reference identifies the roadway class system, maintenance responsibility, and other roadway characteristics in St. Michaels. To review the public-facing document please visit: https://www.roads.maryland.gov/OPPEN/2023%20Talbot.pdf or https://www.roads.maryland.gov/mdotsha/pages/index.aspx?PageId=832.
- Throughout the draft Plan, MD 33 has various naming conventions. To be consistent, we recommend adopting the Highway Location reference "MD 33".
- Recommend using the Highway Location reference regarding roadway abbreviation (for example: Talbot St. vs. Talbot Street).

# **Specific Comments**

# Chapter 5 – Community Facilities and Public Services

Page 73 – Objectives and Implementation Strategies 5.3.4: Recommend reviewing SHA general utility guidance documents relative to utility installation alongside MD 33. To review and to access this information please visit: https://www.roads.maryland.gov/mdotsha/pages/Index.aspx?PageId=869.

# Chapter 6 - Transportation and Utilities

Page 76 – Introduction: Relative to the 2050 Maryland Transportation Plan (2024) consider the Maryland Department of Transportation's (MDOT) Complete Streets Initiative that identifies a range of options for multimodal transportation, which includes active transportation (human-powered mobility, such as biking or walking) during roadway improvement. To review other resources and access this information please visit https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=207.

- Pages 78 and 79 Parking, Pedestrian Circulation, and Bicycles: The MD 33 arterial road is a roadway that meets the criteria for bike activities.
- Page 78 State Roadway System: Consider including Maryland State fiscally constrained Highway Needs Inventory (HNI). The HNI is a part of the State's long-range plan, which includes projects that are critical to Maryland's transportation needs. Talbot County's 2020 HNI includes a 2-lane improvement alongside MD 33 (St. Michael's Rd.) from MD 33 north of Yacht Club Road to MD 33 north of Lincoln Avenue. To view Talbot County's HNI please visit https://www.roads.maryland.gov/oppen/hni T.pdf.
- Page 83 6.4.8 Objectives and Implementation Strategies: The Comp Plan mentions wanting SHA to pursue the reduction of speed limits and the creation of pedestrian crossings around Perry Cabin Ball Fields on MD 33. Consider including the MD 33 requests in the Talbot County Priority Letter. County priority letters document transportation local priorities and aspirations to MDOT publicly. These letters are asked to be forwarded by April every year to be included in the MDOT project priority decision-making. To view Talbot County's current priority letter please visit the Maryland Priority Letter Map at ctp.maryland.gov and scroll down to Priority Letters.

# **Chapter 13 – Climate Resilience**

• Pages 128-138 — 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 at https://hub.arcgis.com/apps/maryland::mdot-sha-climate-change-vulnerability-viewer-ccvv/explore. 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.

Mr. Keith Lackie Page Five

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, MDOT

cc:

Ms. Christy Bernal, TA Program Manager, SHA

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Mr. Keith Lackie Page Six

bcc: Ms. Michelle M. Martin, Director, Planning, OPPPD, MDOT