

October 3, 2025

Dr. Mel Rapelyea, Chair
Town of Betterton Planning Commission
P.O Box 339
Betterton, MD 21610

Dear Dr. Rapelyea,

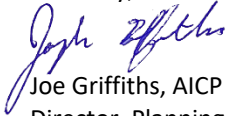
Thank you for the opportunity to comment on the draft Town of Betterton Comprehensive Plan (Draft Plan). The Maryland Department of Planning (MDP) believes good planning is important for efficient and responsible development that addresses resource protection, adequate public facilities, housing, community character, and economic development. 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, Natural Resources, and the Critical Area Commission. 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 Betterton considers the comments included in this review as a reflection of our desire to support Betterton 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 to assist Betterton in any Draft Plan revisions, 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 a PDF copy of the final document to mdp.planreview@maryland.gov. If you have any questions regarding these comments, please email MDP's Eastern Shore Regional Planner, David Dahlstrom, AICP at david.dahlstrom@maryland.gov.

Sincerely,



Joe Griffiths, AICP
Director, Planning Best Practices

Enclosures: Review Comments Town of Betterton Draft Plan

cc: Thomas Mogle, Town Administrator; William Mackey, AICP, Director, Planning, Housing and Zoning, Kent County; David Dahlstrom, AICP, Regional Planner



**Maryland Department of Planning
Review Comments
October 3, 2025
Betterton Draft Comprehensive Plan**

The Maryland Department of Planning (MDP) received the draft comprehensive plan (draft plan) from the Town of Betterton on August 6, 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 the town.

Draft Comprehensive Plan Summary

This draft plan is a full update to the 2009 Comprehensive Plan and closely follows the direction of the 2009 Comprehensive Plan. The update generally focuses on increasing housing opportunities on a 30-acre parcel, promoting a Main Street and Planned Neighborhood growth area, constructing a solar generating facility to offset operational costs to the town's wastewater treatment plant, and promoting a multi-purpose path and sidewalk network.

Maryland State Visions – Synopsis

Land Use Article Section 1-201 requires Maryland jurisdictions with planning & zoning authority to implement the state's eight planning principles (Principles) through a comprehensive plan. The Principles reflect the state's ongoing aspiration to create sustainable communities and to protect the environment in order to foster a high quality of life for all residents of the state. The Principles are Land, Transportation, Housing, Economy, Equity, Resilience, Place, and Ecology.

Plan Analysis

Understanding that the town commenced update to the comprehensive plan before the new Principles became effective, there are relatively minor text edits that could be considered to address the new legislation and the transition from "Visions" to "Principles".

- **Page 7, Section 1.4:** Consider renaming the Section 1.4 title to: "Maryland's 8 Planning Principles and 12 Visions".
 - In the first paragraph, last sentence, consider revising the text to read "...are in concert with the 8 new Sustainable Growth and Planning Principles and the 12 Planning Visions of the State of Maryland".
 - The hyperlink in Section 1.4 takes the reader to the MDP main webpage. Rather, consider addressing this hyperlink to [Maryland's Sustainable Growth and Planning Principles](#). There are similar hyperlinks in Sections 3.1 Quality of Life; 4.1 Public Participation; 5.1 Growth Areas; 6.1. Community Design; 7.1, Infrastructure; 8.1

Transportation; 9.1 Housing; 10.1 Economic Development; and 11.1 Environmental Protection and Resource Conservation.

- **Section, The Visions and 5 Elements:** Consider renaming this section to “The Principles, Visions and 5 Elements. Consider replacing “Maryland Department of Planning” with “State of Maryland”. Consider adding the text of the Principles.
- **Page 8, the 5 elements:** Consider adding “Principles” to this subheading to read “Principles/Visions”.
- **Section 3.2, Sustainability:** While titled Sustainability, this section does not mention actions to protect or expand the natural environment and resources, advance renewable energy, or ensure infrastructural capacity remains operable and sufficient. MDP encourages the Town of Betterton to incorporate activities into this section which highlight any planning or action for improving renewable energy capacity, any projects for natural area protection or restoration, and any upgrades to protect or improve the reliability of local infrastructure.
- **Page 8, Introduction, Section 4:** This is the only mention of resilience throughout the draft plan. MDP encourages alignment with the Kent County Hazard Mitigation Plan to effectively outline how the Town of Betterton will respond to unexpected hazards. The Town of Betterton may also identify how vital functions/services may be delivered where the county is incapable of doing so.
- **Page 8, Last paragraph:** Since the Principles became effective on October 1, 2025, the town should consider revising the referenced April 2025 date to “On October 1, 2025”, and consider reorganizing the order of the last sentence to read “This comprehensive plan addresses the newly articulated 8 Principles and continues to honor the spirit and intent of the original 12 Visions”.
 - The hyperlink in the last paragraph takes the reader to MDP’s main webpage. Rather, consider addressing this hyperlink to [Maryland's Sustainable Growth and Planning Principles](#).
- **Page 8, Graphic:** Consider replacing or adding the text of the 8 new Planning Principles. MDP included a Model Principles Insert along with this 60-day review which the town may use for this purpose.

Maryland Department of Planning Review of Town of Betterton Public Comprehensive Plan Draft

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 the Town of Betterton addresses them.

Checklist of Maryland Code (Land Use Article) Element Requirements for Non-Charter Counties and Municipalities			
Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Town of Betterton Reference
(1) A comprehensive plan for a non-charter county or municipality must include:	L.U. § 3-102(a)		Municipal
(a) a community facilities element	L.U. § 3-102(a)(1)(i)	L.U. § 3-108 -- Community facilities element.	Pages 31-33
(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	No individual element but integrated into various elements
(c) a goals and objectives element	L.U. § 3-102(a)(1)(iii)	L.U. § 3-110 -- Goals and objectives element	No individual element but integrated into various elements
(d) a housing element	L.U. § 3-102(a)(1)(iv)	L.U. § 3-114 -- Housing element SB-687(2021)	Pages 38-39 but does not address new requirements
(d) a land use element	L.U. § 3-102(a)(1)(v)	L.U. § 3-111 -- Land use element	Pages 24-25
(e) a development regulations element	L.U. § 3-102(a)(1)(vi)	L.U. § 3-103 -- Development regulations element	No individual element but integrated into various elements.
(f) a sensitive areas element	L.U. § 3-102(a)(1)(vii)	L.U. § 3-104 -- Sensitive areas element	Pages 42-45
(g) a transportation element	L.U. § 3-102(a)(1)(viii)	L.U. § 3-105 -- Transportation element	Pages 35-36
(h) a water resources element	L.U. § 3-102(a)(1)(ix)	L.U. § 3-106 -- Water resources element	No individual element but integrated into various elements
(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

Maryland Department of Planning Review of Town of Betterton Public Comprehensive Plan Draft

Checklist of Maryland Code (Land Use Article) Element Requirements for Non-Charter Counties and Municipalities			
Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Town of Betterton Reference
(j) for municipalities only, a municipal growth element	L.U. § 3-102(a)(3)	L.U. § 3-112 -- Municipal growth element	Pages 24-28
(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 applicable
(3) Principle -- 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 8 Planning Principles	Pages. The town introduces new Sustainable Growth Principles.
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		Betterton adopted a Tier Map but has not incorporated the Tier Map into the Comprehensive Plan.

Conformance with Section 3-102 of the Land Use Article

The following analyzes whether the draft plan meets the requirements of municipal comprehensive plan elements, in accordance with the LUA.

1. Development Regulations Element – Synopsis

The 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 the development regulation element requirement by integrating a range of recommendations, actions, objectives, etc. into the various other draft plan elements. Therefore, specific comments related to development regulations are addressed in the various draft plan elements.

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 is affirmatively furthering fair housing through its housing and urban development programs.

Plan Analysis

Affordable Housing

The Maryland Code requires that comprehensive plan housing elements address the need for affordable housing within the jurisdiction, including low-income housing and workforce housing (Land Use § 3-114). It defines low-income housing as “housing that is affordable for a household with an aggregate annual income that is below 60% of the area median income” (Land Use § 3-114). It defines workforce housing as (1) rental housing that is affordable for a household with an aggregate annual income between 50% and 100% of the area median income or (2) homeownership housing that is affordable to a household with an aggregate annual income between 60% and 120% of the area median income (Housing and Community Development § 4-1801).

While the draft plan includes housing affordability data on page 39, it does not seem to address affordability for income categories as defined in the Maryland Code. MDP recommends that Betterton refer to Maryland's [Housing Data Dashboard](#), which includes data specific to those income categories in addition to other useful info that could assist in revision of the plan's housing element. MDP also recommends that Betterton include data that can help it assess the need for affordable housing in the town. Betterton can find data specific to the town using the [Housing Needs Assessment tool provided by Local Housing Solutions](#).

Fair Housing

The Maryland Code requires that local jurisdictions affirmatively further fair housing in their housing and urban development programs (Land Use § 3-114). To affirmatively further fair housing means taking meaningful actions aimed at combating discrimination to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to housing and opportunity based on protected characteristics (Housing and Community Development § 2-401). To this end, the draft plan is required to include an assessment of fair housing (Land Use § 3-114).

The draft plan does not seem to include an assessment of fair housing. Land Use § 3-114 does not define what an assessment of fair housing entails, but MDP recommends referring [its guidance on affirmatively](#)

[furthering fair housing](#), which describes fair housing best practices and how jurisdictions might consider using them in their housing elements. In particular, MDP has published a [self-assessment](#) for communities like Betterton with populations too small to conduct a quantitative assessment of fair housing using publicly available data. MDP recommends that Betterton use this self-assessment to guide its plans and public engagement on housing in the community.

Other Recommendations

- HB1466 (2025) requires that local governments adopt a local law authorizing development of accessory dwelling units by October 1, 2026. MDP will release guidance over the next year in advance of the 2026 effective date to prepare local jurisdictions for implementation of HB 1466. MDP recommends that Betterton follow best practices in design of its ADU law to be consistent with its stated goal of remaining “flexible to accommodate housing needs over time”.
- HB538 (2024) requires that local governments permit manufactured and modular housing in each zoning district that permits single-family residential uses. The town should consider a policy statement to review its permitting procedures for manufactured and modular housing, as applicable. To learn more about HB 538, please review the [Maryland Department of Housing and Community Development’s FAQs](#) about the bill.
- MDP encourages Betterton to add details to its housing element regarding other housing preferences and needs for the community. MDP's staff is ready to meet with Betterton to identify other goals, strategies, and actions it may consider pursuing based on its community engagement.
- **Page 39, A Plan for Housing:** considering adding a strategy to adjust the town’s Table of District Regulations in the zoning ordinance to reduce lot sizes and front-yard setbacks in the Main Street area.
 - Consider including a policy statement to increase housing type options by expanding the town’s zoning code to permit a wider range of housing types, smaller minimum lot sizes, and reduced front and side-yard setback standards, appropriate to the historic character of the town.
 - Consider including a policy statement to support the rehabilitation of the town’s existing housing stock and application of available grant funding to support housing rehabilitation and individual well-being, such as, the DHCD Sustainable Communities Community Legacy or Community Services Block Grant programs.

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 and Natural Resources.

Plan Analysis

To enhance the resilience of every coastal jurisdiction in Maryland and to prepare for the future of increased flooding, the State of Maryland requires that every coastal municipality and county that experiences nuisance flooding to submit a nuisance flood plan to DNR and MDP and for it to be updated every five years. The town has not submitted a nuisance flood plan. Pursuant to [Maryland House Bill 1427 \(2019\), §3-1018\(b\) and \(c\)](#), on or before Oct. 1, 2020, a local jurisdiction that experiences nuisance flooding shall develop a plan to address nuisance flooding. In addition, a local jurisdiction shall update the plan every five years; publish the plan on the local jurisdiction's website; and submit a copy of the plan to MDP.

Although not a comprehensive plan requirement, if the town is experiencing nuisance flooding, then the town should consider including a policy statement to prepare a nuisance flood plan. In Chapter 11.2 Sensitive Areas, the Town of Betterton identifies steep slopes as an area of concern. The town has successfully secured and implemented a pre-disaster mitigation grant from FEMA to address erosion alongside Bayside Boulevard. Erosion alongside Bayside Boulevard is introducing risk to infrastructure, property, and the town's vital beach. The town has successfully pursued funding for prevention, but the projects have not been completed yet. MDP encourages the town to include a policy statement to identify that the proposed solutions are considerate of unexpected impacts from extreme weather, such as if backfill material faces any risk of washing away/further destabilizing in the event of flooding as projected by FEMA or less predictable bouts of extreme storms.

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

- **Page 35, Section 8, Transportation:** Consider including a map figure with the general location of existing trails, and potential linkages and routes for future trails.
 - In Objective 2, after 'future roads', consider adding 'are consistent with the rural transect to'. Including the hyperlink to the [MDOT's context sensitive website](#) may be appropriate.
- **Page 37, Strategy Transportation Design 2:** MDP encourages the town to incorporate a 'street hierarchy' in their zoning and subdivisions regulations.
- MDP supports the town's recommendation to develop a function classification of street profiles to promote biking and walking, and to prepare a missing sidewalk inventory. We encourage the inclusion of off-street bicycle paths to promote safety and comfort. Consider adding missing crosswalks and traffic calming as a part of this inventory, particularly around Betterton Beach.

- MDP supports the town's recommendation to incorporate a multi-use path from Sixth Avenue Park to the beach and should consider adding bicycle parking and summer beach shuttle stop or shelter at the beach, park, or other destinations.
- Consider adding a policy statement to promote the inclusion of sidewalk, multi-use paths, and trails development as part of the Sustainable Communities Action Plan Transportation Section and update applicable portions of the town's land development regulations to implement the requirements for sidewalks, multi-use paths, and trails. The MDOT [Recreational Trails](#) and [Transportation Alternative](#) programs may be useful resources to achieve these objectives.
- With limited transit opportunities serving the Betterton area, consider opportunities to contact MTA for options to provide on-demand medical services transportation.
- For description of future street profiles, the town should consider incorporating the context sensitive terminology adopted by MDOT to define the character of future improvements at: <https://experience.arcgis.com/experience/3476e680584c49e48303fe6d52ceeda9/page/The-Contexts>

5. Water Resources Element – Synopsis

The water resource element is required to consider available data provided by the Maryland Department of the Environment (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

There is not a stand-alone Water Resources Element, but water resource element requirements are spread throughout the other plan elements. The 2009 Comprehensive Plan contains a Water Resource Element. Consider adding updated components of the 2009 Water Resource Element into to the 2025 Comprehensive Plan.

The town is entirely served by public water and sewer. The wastewater treatment system has remaining capacity for approximately 3-4 times as many sewer connections as the 289 current allocations. Regarding water demand and capacity, current demand ranges from 24,000 gallons per day (GPD) in winter to 35,000 GPD in late summer; and the town has a permitted monthly average withdrawal of 60,000 GPD—so there is also remaining water capacity to serve potential growth.

The town's five pump stations were equipped with electrical receptacles to allow the emergency use of a portable generator during power outages, with American Rescue Plan Act funds.

The town is facing financing concerns regarding operating costs for the wastewater treatment plant, which have been exacerbated by a decrease in the town's already small population/tax base. In addition, the town's water system is aging and will need to be replaced during the planning period.

The town is working to address lead in water by beginning to work with homeowners to identify and replace lead in their household piping as well as upgrades to nearly a third of all town dwelling units through the Wheeler Avenue project (completed in 2020) and reconstruction of the water infrastructure beneath Ericsson Avenue (in 2025).

- The draft plan does not provide demand and capacity comparison tables for water or wastewater supply. Although the town has adequate capacity to meet future water and wastewater demand, has the town considered providing tables to demonstrate current and future Equivalent Dwelling Units (EDUs) and non-residential uses compared to water and wastewater capacity and demand?
- Since the draft plan discusses potential increases in use intensity and development/redevelopment density associated with the Planned Neighborhood, has the town conducted 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 increases in intensity/density will impact storm water, nutrient loading, and climate change considerations? MDP's Water Resources Element (WRE) Guidance Update can be used to guide the town regarding best practices for water resources planning.
- **Page 31, Infrastructure:** Consider providing data related to the average wastewater treatment flow rates and the permitted capacity of the wastewater treatment facility.

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

Goals and objectives have been integrated throughout the draft plan. However, there is little consistency in draft plan goals, objectives, and actions between the various elements. The 2009 Comprehensive Plan includes specific sections of the elements that are identified for this function and could be updated and included in the adopted version of the 2025 Comprehensive Plan.

Although a separate element is not required, there is a new requirement to include a 5-year mid-cycle review of the comprehensive plan's implementation status. A stand-alone element may be helpful to facilitate this review and requirement. One of the action steps included in this element could include the recognition that a mid-cycle report will be due in 5 years, or in year 2030. Another consideration is to establish policy goals that are intended to be completed within 5 years and other policy goals which may be longer term.

Specifically, the new 5-year mid cycle review includes a summary of the following, pursuant to [§1-207\(c\)\(6\)](#):

- (i). Development trends contained in the previous (4) annual reports filed during the period covered by the narrative;

- (ii). The status of comprehensive plan implementation tools, such as comprehensive rezoning, to carry out the provisions of the comprehensive plan;
- (iii). Identification of any significant changes to existing programs, zoning ordinances, regulations, financing programs, or State requirements that will be necessary to achieve the visions and goals of the comprehensive plan during the remaining planning timeframe;
- (iv). Identification of any State or federal laws, regulations, or requirements that have impeded local implementation of the comprehensive plan and recommendations to remove any impediments;
- (v). Future land use challenges and issues; and
- (vi). A summary of any potential updates to the comprehensive plan.

Note: The 5-Year Mid-Cycle Review Schedule tables can be viewed in the Transition Schedule section at <https://planning.maryland.gov/pages/OurWork/compPlans/ten-year.aspx>. MDP strives to keep the Transition Schedule up to date. Please notify Planning if any corrections or updates to your Transition Schedule is necessary.

A copy of the 5-Year Report template (this form) can be found in the Report Template section at: <https://planning.maryland.gov/Pages/YourPart/sqgannualreport.aspx>.

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

There is not a stand-alone Land Use Element, but the land use element requirements are generally included in the Growth Element.

- **Page 18, Land Use Table:** The amount of Residential Total acreage identified in row 1 (484 acres), is not consistent with the total acres of R1 (121 acres) and R2 (303) lands, or 424 acres.
- **Page 34, activities:** In the first bullet, please describe the comprehensive rezonings that area anticipated.

8. Municipal Growth Element - Synopsis

The municipal growth element (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 town intends to grow within its designated growth area, and the draft plan establishes a coordination process with Kent County to encourage the protection of the rural and agricultural character in a 3-mile boundary surrounding the town. No population projection is identified in this chapter; however, the chapter more broadly discusses development of a Planned Neighborhood, including new housing and retail. Notably within the Key Objectives, the plan goals for renewable energy sources and new water wells for residential and commercial expansion.

- **Page 24, Growth Areas: 5.1:** Article 66B has been repealed and replaced with the Land Use Article. All references to Article 66B should be updated as part of this draft plan update. In this instance the first paragraph could be deleted.
- **Page 25, Origins of the “Planned Neighborhood”, paragraph 3:** While it is appropriate for a comprehensive plan to recommend 5 additional characteristics for the Planned Neighborhood (PN) zoning category, there should also be a clear policy statement that instructs the town to incorporate these 5 characteristics into adopted a “Planned Neighborhood” zoning category. These 5 additional characteristics are generally included as part of the 7 Key Objectives listed on page 26. Similarly, there should be a clear policy statement that instructs the town to incorporate these 7 Key Objectives into the towns zoning code. This policy statement could be incorporated into Section 5.8, Actions.
- **Page 27, Population Projections:** This section describes the history of population in Betterton rather than projections. The town should consider establishing some level of projected town population through at least the next 10-year horizon. This could be either a decrease, maintain, or increase in the 2020 population totals.
 - Consider utilizing the undeveloped residential land acreage (~167 acres) to estimate future population potential. A similar analysis was included on page 49, Table 3, in the 2009 Comprehensive Plan.
 - In Section 5.6, the Sustainable Communities ‘application’ should be referenced as the ‘Action Plan’. The draft plan could include a clear policy statement to complete the housing and vacant lands survey. The Development Capacity Analysis can also aide in identifying the potential need for the water and sewer services, referenced in Section 5.7, Impacts of Growth.
 - The 30-acre parcel is also identified as parcel 1288, while it is referenced as parcel 1488 in Sections 5.2 and 5.3.
- **Page 28, Section 5.8, Potential Phased Construction Plan:** It is not clear what the phased construction plan is referencing. It appears to be a reference to the creation of Main Street on the 30-acre parcel 1288. Perhaps the title of Section 5.8 could be renamed as ‘Growth Area Implementation’. Actions could be listed by project type, such as, Main Street, Zoning Code Update, and Development Capacity Survey.
- **Page 40, Growth Areas:** Consider using another term for ‘Growth Areas’, such as, “Redevelopment Areas”. This term could get confused with the ‘Growth Areas’ in Section 5.1.

- Consider adding the Growth Area Map that appears on page 53 of the 2009 Comprehensive Plan.
- The draft plan mentions that the new wastewater treatment plant will pursue a solar array to help curb the \$40,000 estimated annual utility bill. MDP encourages the town to assess whether the large-scale solar array may also support other critical municipal buildings and infrastructure. With the State of Maryland facing an energy crisis, including additional capacity for critical infrastructure at the start of project scoping will prove more cost-effective than retroactively and incrementally expanding renewable energy over the coming years. MDP encourages the town to evaluate the maximum estimated capacity for solar and the amount of energy it may produce.
- The draft plan also notes that solar farming within the town's municipal boundaries is a major concern for the town's ability to accommodate growth within the designated growth area. Given the town's desire to accommodate some solar power to service the wastewater plant and the potential loss of land available to accommodate the town's economic and housing objectives, the town should consider identifying a potential parcel of land, possibly adjacent to the town, that could accommodate both a town solar array and a private solar array. If a partnership is viable, then the [Local Government Energy Modernization Program](#) may be a useful tool to help offset the costs of constructing this facility. Some modification to the town's Growth Area Map and policy statements may also be necessary.
- The draft plan notes a desire for expanded water service to allow for safer water quality and higher land uses. MDP encourages the town to consider the impacts of unexpected natural and manmade threats on upcoming infrastructure upgrades and community needs. Additionally, the Town of Betterton may consider including policy statements to further green infrastructure throughout the surface level sewer drains so that pollutants and debris may be mitigated before reaching the new wastewater plant, easing processing and improving water quality.

9. Growth Tiers - Synopsis

The town's growth tiers map is required to be included in the comprehensive plan. The growth tiers map may be subsequently amended by the town without the need to amend the comprehensive plan.

Plan Analysis

The town administratively adopted a Growth Tier Map on October 9, 2012, which identifies the entire town as Tier 1. The map is not included in the draft plan. The town's previously comprehensive plan was adopted in 2005 and amended in 2009, so the Growth Tier Map is not yet considered adopted. Has the town considered incorporating the Growth Tier Map into the 2025 comprehensive plan so it will be considered adopted with the adoption of the plan?

12. Betterton is a Sustainable Community

Betterton has designated most of the town as a Sustainable Community. 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 action plan

Maryland Department of Planning Review of Town of Betterton Public Comprehensive Plan Draft

for consistency with the new comprehensive plan and consider how the action plan and the financial incentives provided in the Sustainable Communities designation can support plan implementation. This could be completed as an amendment to the action plan, or at the time of the next action plan re-certification.

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**

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 Betterton as soon as possible.

Attachments

Maryland Critical Area Commission

Maryland Department of Natural Resources

Maryland Department of Transportation

Maryland Department of Housing and Community Development

Wes Moore
Governor
Aruna Miller
Lt. Governor



Erik Fisher
Chair
Nick Kelly
Executive Director

**STATE OF MARYLAND
CRITICAL AREA COMMISSION
CHESAPEAKE AND ATLANTIC COASTAL BAYS**

August 13, 2025

Mr. David Dahlstrom
Maryland Department of Planning

Re: Town of Betterton 2025 Draft Comprehensive Plan

Dear Mr. Dahlstrom,

Our office received a copy of the Town of Betterton's Draft 2025 Comprehensive Plan and we have the following comment:

1. We recognize that the Town of Betterton plans to improve the sidewalks throughout town, repair the Rigbie steps, stabilize the slopes along Bayside Boulevard, and may make other waterfront improvements. Our office looks forward to continuing coordinating with the Town on projects within the Critical Area.

Thank you for allowing our office to provide comments on this draft comprehensive plan. If you have any question, please don't hesitate to contact me at kathryn.hayden@maryland.gov or 443-848-9160.

Sincerely,

A handwritten signature in cursive script that reads "Kathryn Hayden".

Kathryn Hayden
Natural Resources Planner

cc: Charlotte Shearin, Critical Area Commission
Rita Pritchett, Maryland Department of Planning



*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 Town of Betterton 2025 Comprehensive Plan

To: David Dahlstrom
cc: Rita Pritchett

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

The harbor, dock and boat ramp area supports dense submerged aquatic vegetation (SAV) beds most of the year. These areas are critically important to many fish and wildlife species. Any plans to rework these areas will be difficult without significant impacts to this valuable resource. In addition to SAV beds, the town is adjacent to important nursery habitat for a variety of species. The town is adjacent to spawning and larval nursery habitat for Striped Bass. Finally, the Sassafras River and adjacent Upper Bay areas are important tidal black bass fisheries. The plan doesn't mention these fisheries or fish habitat specifically, but it does mention environmental protections for the town that will help protect these habitats and fisheries. Overall, the plan does a good job of addressing protection of Critical Areas, which will benefit fish habitat conservation.

Overall, there does not seem to be extensive development planned for Betterton. Any development that does occur should be carefully planned to limit increases in the amount of impervious surface. Any new growth will be connected to the wastewater treatment plant. This will help reduce nutrient runoff into local waterways.

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

September 10, 2025

Mr. David Dahlstrom
c/o Rita Pritchett
Maryland Department of Planning
120 E. Baltimore Street, Suite 2000
Baltimore MD 21202

Dear Mr. Dahlstrom:

Thank you for coordinating the State of Maryland's comments on The Town of Betterton, Maryland 2025 Comprehensive Plan (the Plan). The Maryland Department of Transportation (MDOT) offers the following comments on the Plan for consistency with the State of Maryland and MDOT's goals and objectives:

General Comments

- In general, the Plan is consistent with MDOT plans and programs. The MDOT supports the goals of the Plan, which include:
 - Maintaining the safety and quality of dedicated town streets.
 - Ensuring that potential future roads protect the character of Betterton.
 - Establishing walking and/or biking trails for access and passive recreation wherever possible.
- Shifting transportation mode choice towards transit and active transportation, shortening automobile trips, and increasing carpooling and vanpooling, are critical components to building efficient, equitable, and sustainable places, and is also essential to accommodating Maryland's changing demographic composition. The MDOT manages several active transportation programs:
 - Transportation Alternatives (TA) Program: a reimbursable, federally funded program for local sponsors to complete community projects designed to strengthen the intermodal transportation system. The program provides funding for projects that enhance the cultural, aesthetic, historic, and intermodal transportation system. The program can assist with projects that create bicycle and pedestrian facilities, restore historic transportation buildings, convert abandoned railway corridors to pedestrian trails, mitigate highway runoff, and other transportation-related enhancements. Project sponsors are required to provide a minimum 20 percent of the total project as a match.

- **Recreational Trails Program:** a federally funded program that the State Highway Administration (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.
- **The MDOT's Kim Lamphier Bikeways Network Program:** a program that allocates State transportation funds administered by the MDOT Secretary's Office to promote biking as an alternative transportation mode.
- For more information on MDOT's active transportation planning and programming efforts, please see our Maryland's Bicycle and Pedestrian Plans and Programs web page:
<https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=24>.
- **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 and incentives. Please visit the Commuter Choice Maryland web site at <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=29> for more information.
- The MDOT supports continued improvements to expand and enhance transit options. Please coordinate with the Maryland Transit Administration (MTA) Office of Statewide Planning for any coordination regarding 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 regional transit planning, please contact Mr. Stephen Miller, Chief of Strategic Planning, via email at SMiller6@mdot.maryland.gov or phone at 410-767-3869. For local transit service planning, please contact Mr. Jason Kepple, MTA Regional Planner, via email at Jkepple@mdot.maryland.gov.
- A Transit Oriented Development (TOD) Program was established within MDOT to provide services including identifying potential TOD opportunities and evaluating existing and future needs of public transportation facilities. For TOD related data resources please visit the Transit-Oriented Development in Maryland web page: <https://data-maryland.opendata.arcgis.com/pages/tod>

Chapter 8.2: Transportation Strategy Comments

- It is recommended to refer to Transportation System Management and Operations (TSMO) strategies that focus on operational improvements that can maintain and even restore the performance of the existing transportation system before extra capacity is needed (per the Federal Highway Administration (FHWA)).

Mr. David Dahlstrom
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- Relative to MDOT implementing resilience strategies and initiatives to withstand the impacts of climate change on transportation infrastructure, please review the SHA Climate Change Vulnerability Viewer 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. To review other MDOT Climate Change programs and to access this information please visit: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=169>.
- Consider mentioning that Betterton is included in a Rural Context Zone. It is recommended that any roadway improvements include appropriate bicycle and pedestrian accommodations. For all roadway and sidewalk improvements to SHA roadway facilities, please provide for and maintain bicycle facilities as well as full ADA-compliant pedestrian facilities. To determine an appropriate bicycle accommodation, please reference: https://www.mdot.maryland.gov/OPCP/MDOT_State_Bike_Ped_Master_Plan_FULL_FINAL_VERSION.pdf Appendix D: Bicycle Facility Selection Guide of the 2050 Maryland Bicycle & Pedestrian Master Plan.
- Consider adopting the MDOT's Complete Streets initiative. The Complete Streets initiative identifies a range of options for multimodal transportation, which includes active transportation (i.e., human-powered mobility such as biking or walking) during roadway improvement delivery. To review other resources and access this information, please visit: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=207>.

Thank you again for the opportunity to review the Plan. If you have any additional questions or concerns, please do not hesitate to contact Ms. Nicole Condol, Transportation Planner, MDOT Office of Planning, Programming, and Project Delivery (OPPPD) at 410-230-6614, or via email at ncondol@mdot.maryland.gov. Ms. Condol will be happy to assist you.

Sincerely,



Geoff Anderson
Chief, OPPPD, MDOT

cc: Ms. Nicole Condol, Transportation Planner, OPPPD, MDOT
Mr. Jason Kepple, Regional Planner, MTA
Mr. Stephen Miller, Chief of Strategic Planning, MTA

September 5, 2025

David Dahlstrom, AICP
Upper Eastern Shore Regional Planner
Maryland Department of Planning
120 E. Baltimore St, Suite 2000
Baltimore, MD 21202

Dear Mr. Dahlstrom:

Thank you for the opportunity to review and comment on the Town of Betterton 2025 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.

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 provide only limited information regarding affordable housing goals and strategies. While they are generally consistent with key elements of the Sustainable Communities Action Plan, they could be expanded to provide more detail. DHCD resources that could assist with revitalization of existing residential properties, and the development of new affordable housing are discussed below.
2. DHCD can assist with home repairs that improve comfort, livability, and accessibility for homeowners through its Special Loan Programs. Planning staff and residents can learn more about these programs at <https://dhcd.maryland.gov/Residents/Pages/SpecialLoans.aspx> or contact the program directly at 301-429-7409 or DHCD.SpecialLoans@maryland.gov.
3. The Plan does not show that the Town of Betterton has conducted a point-in-time count to identify the total number of people experiencing homelessness in Betterton, 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

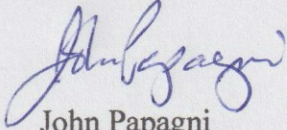
Suzanne.Korff@maryland.gov. Persons experiencing homelessness and needing assistance, should contact 211 Maryland by dialing 211 for 24/7 access to health and human service resources.

4. There is limited discussion in the plan regarding income and poverty. However, the Town of Betterton or non-profits active in Betterton 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. If planning staff want to explore financing affordable and workforce housing through the Low Income Housing Tax credit Program (LIHTC, they may find more info 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. Planning staff and residents may learn more about Maryland's homeownership programs at <https://mmp.maryland.gov/pages/default.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>.
8. The Plan discusses the need for infrastructure improvements, including improving sidewalks and public facilities. State Revitalization Programs administered by the Maryland Department of Housing and Community Development's Division of Neighborhood Revitalization may be able to assist. For more information contact Maria Mougridis at 410-209-5803, or email maria.mougridis@maryland.gov
9. The Plan's Housing Element does not include an assessment of fair housing in compliance with House Bill 90 (2021). For technical assistance in development of the Plan's Housing Element, please contact Carter Reitman, Lead Housing Planner at the Maryland Department of Planning, (410) 767-3837 or email Carter.Reitman2@maryland.gov



We in the Division of Neighborhood Revitalization look forward to continuing our partnership with the Town of Betterton 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
State Revitalization Programs

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

