



Maryland DEPARTMENT OF PLANNING

May 5, 2020

Mr. Michael J Gahan III,
La Plata Planning Commission Chairman
305 Queen Anne Street
La Plata, Maryland 20646

Dear Mr. Gahan III:

Thank you for forwarding the Draft 2019 Town of La Plata Comprehensive Plan for its 60-day state agency review. The Maryland Department of Planning (Planning) believes that good planning is important for efficient and structured development that successfully addresses resource protection, community character, and economic development. Planning is encouraged by the town's efforts to grow responsibly, invigorate its downtown, and carefully manage its water resources.

The department's Planning Coordination and Planning Data and Research Divisions have reviewed the draft and prepared comments for La Plata planning staff and the Planning Commission. Planning also forwarded a copy of the draft plan to several state agencies for review. To date, we have received comments from the Departments of Transportation, Housing and Community Development, and the Maryland Historical Trust, which are attached at the end of this document. Any additional state agency comments will be forwarded upon receipt.

Please consider that Planning's comments reflect the agency's recommendations and observations on ways to strengthen the town's plan, as well as satisfy the requirements and intent of the Maryland Land Use Article. Please feel free to contact me at (410) 767-1401 (chuck.boyd@maryland.gov) or Sarah Lipkin Sularz, Southern Maryland Regional Planner, at (410) 767-3837 (sarah.lipkinsularz@maryland.gov). Planning appreciates your participation in the plan review process.

Sincerely,

Charles W. Boyd, AICP
Director, Planning Coordination

cc: Jeanine Harrington, La Plata Director of Planning
Joe Griffiths, Manager Local Assistance and Training
Sarah Lipkin Sularz, Southern Maryland Regional Planner

Maryland Department of Planning Review Comments
May 5, 2020
Draft 2019 Town of La Plata Comprehensive Plan

The Maryland Department of Planning (Planning) has reviewed the Draft 2019 Town of La Plata Comprehensive Plan (Plan) and offers the following comments for your consideration. These comments are offered as suggestions to improve the draft comprehensive plan and better address the statutory requirements of the Land Use Article. Planning has been working closely with the town since the initiation of its update process, aiding with a development capacity analysis, transportation planning, and engaging in the stakeholder process. Planning disseminated the draft for comments from other departments as part of the formal 60-day review required by the Land Use Article. All other State Agency comments have been attached at the end of the review packet as addendum.

Summary of the Draft Comprehensive Plan

This is a complete update to the Town of La Plata Comprehensive Plan 2009. In developing an update to its comprehensive plan, La Plata is aiming to meet the Maryland state requirement for a comprehensive plan update every 10 years. The town roots itself in effective planning with dedicated local staff, consultant assistance, an engaged community, and visioning. La Plata faces similar planning challenges as those addressed in the 2009, and the focus of the updated plan shares many features of the 2009 plan.

Minimum State Law Requirements for Municipalities

Maryland’s Land Use Article sets forth the required components of a local comprehensive plan but does not mandate a specific format. As such, local governments have addressed these required elements in a manner that fits the needs of their community and the resources available to respond to the issues explored during the planning process. The following checklist summarizes an assessment as to whether each required local plan element is addressed in the Plan.

TABLE 1

Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans in Maryland			
State Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Draft 2019 Town of La Plata Comprehensive Plan page references
(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.	Pg(s). 60
(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	Pg(s). 33
(c) a goals and objectives element	L.U. § 3-102(a)(1)(iii)	L.U. § 3-110 -- Goals and objectives element	Pg(s). 10-20

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Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans in Maryland			
State Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Draft 2019 Town of La Plata Comprehensive Plan page references
(d) a land use element	L.U. § 3-102(a)(1)(iv)	L.U. § 3-111 -- Land use element	Pg(s). 21
(e) a development regulations element	L.U. § 3-102(a)(1)(v)	L.U. § 3-103 -- Development regulations element	Pg(s). 27
(f) a sensitive areas element	L.U. § 3-102(a)(1)(vi)	L.U. § 3-104 -- Sensitive areas element	Pg(s). 33
(g) a transportation element	L.U. § 3-102(a)(1)(vii)	L.U. § 3-105 -- Transportation element	Pg(s). 49
(h) a water resources element	L.U. § 3-102(a)(1)(viii)	L.U. § 3-106 -- Water resources element	Pg(s). 41
(i) a mineral resources element, IF current geological information is available	L.U. § 3-102(a)(2)	L.U. § 3-107 -- Mineral resources element	N/A
(j) for municipalities only, a municipal growth element	L.U. § 3-102(a)(3)	L.U. § 3-112 -- Municipal growth element	Pg(s). 27
(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 housing element ; (e) a natural resources element; (f) a pollution control element; (g) information concerning the general location and extent of public utilities; and (h) a priority preservation area (PPA) element	L.U. § 3-102(b)	L.U. § 3-102(b)(2)(i)	Pg(s). 64
(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	Pg(s). 4
Optional: (4) Growth Tiers -- If the local jurisdictions 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		N/A

As shown in the above checklist, the Plan includes the required elements as identified in §3-102 of the Land Use Article of the Maryland Annotated Code. The Environmentally Sensitive Areas Element is intended to also satisfy statute §3-109 regarding Areas of Critical State Concern (pg. 34). The 2019 comprehensive plan also includes Housing, Recreation and Parks, and Economic Development Elements.

General Comments

Planning commends La Plata for the depth and extent of planning content included in the Plan, surpassing the basic requirements. The document is laid out clearly, with each section including an analysis of changes since the 2009 plan, existing conditions, and goals and

actions. Planning thanks the town for submitting a preliminary draft for review in 2019, and appreciates the modifications made to the document since that time. Implementation strategies have been added since the informal review and are a great addition to this document. Implementation is a core component used by successful communities to guide growth and policy in a manner achieving the plan goals. They can also assist in leveraging funding and other resources from appropriate sources and partners.

Planning recommends that the town revisit the population estimates and projections in this document when the 2020 census figures are published and consider any needed adjustments to more accurately reflect the future of the community.

The town adopted a growth tier map on December 18, 2012. As provided in Section 3 of House Bill 409 of 2013 General Assembly, if a Growth Tier Map is not adopted into the local comprehensive plan by the time the 10-year comprehensive plan review is required, the local Growth Tier Map shall be considered not adopted for purposes of § 9–206 of the Environment Article. Additionally, Map 3 of the Plan proposes expansions and reductions to different portions of the town’s existing municipal growth areas since the 2012 Growth Tier Map. The town may wish to amend its growth tier map to reflect the revised municipal growth areas and to incorporate the amended Growth Tier Map into the town’s Comprehensive Plan.

If the comprehensive plan is revised to include a tier map, Planning will complete a detailed review of the growth tier map under Section 1-505 of the Land Use Article after the plan is adopted. If requested Planning can complete an informal review of any proposed tier map changes before the comprehensive plan is adopted.

Suggested Technical Edits/Suggestions

1. Planning suggests verifying acreage calculations / totals throughout document for consistency. See bullets below for further details on these calculations.
2. Planning suggests using fully written out names before acronyms throughout the Comprehensive Plan for legibility.
3. Planning recommends including information about the state and federal tax credit programs for historic properties, noting that eligibility for or listing in the National Register of Historic Places is helpful in qualifying properties for federal and state financial incentives. The Heritage Structure Rehabilitation Tax Credit’s Small Commercial program, designed to help fund modest rehabilitation projects, may deserve special mention since projects are frequently undertaken in smaller, Main Street-type communities. Details about these programs can be found in the attachment from MHT.

Detailed Element Review Comments

The following are detailed comments on each of the sections of the Plan:

Introduction:

1. Any time a meeting or work effort is referenced, an associated date or sequence of events could be added to prioritize and give more context to the reader.
2. Planning commends the town on the amount of community engagement and outreach it conducted during the comprehensive planning process. The list of other documents reviewed on page 9 is also helpful to understanding the comprehensive analysis of this work during the review process.
3. Planning is encouraged by the town's goal of prioritizing mixed-use and infill projects and necessary efforts to advance creation of the La Plata Town Center in Goal #1 of the Plan on page 10.
4. Planning commends the town for inclusion of Goal #5 (pg.11) by improving intergovernmental coordination in respect to annexation, development processes and public facilities. The town and county should continue to work together to agree on proposed land uses in areas that will someday become part of the municipality.

Land Use Element:

1. On page 7 of the Plan, a document called *The La Plata Town Center Corporation Assessment Report La Plata, Maryland 2012* (Assessment Report) is referenced. Planning notes the recommendations/opportunities in this document inform potentially greater residential density the downtown area. Specifically, one notes the opportunity to "Create developments with more density to differentiate the downtown from the residential neighborhoods throughout the rest of La Plata." In this draft, high density residential zoning is capped at 20 dwelling units per acre in the Town of La Plata. In today's market, with the cost of land and construction being a large factor in new development, the town may want to consider targeted higher density in its downtown area, to encourage residential uses and re-investment, which will support both the Assessment Report's opportunity and Land Use Goal #1 on page 25. Although vertical mixed-use might be desired, the concept of considering surrounding uses on adjacent properties contributing to a mixed-use environment, may provide flexibility in the residential market.
2. Planning suggests that Goal 1 #3 on page 25 be modified to clarify whether the goal is discussing parking minimum requirements or general parking requirement changes in another respect, such as setbacks from the pedestrian zone.
3. In Land Use Goal #3, action item 2, in addition to definitions of new uses to be added to the zoning ordinance, stating the use of an overlay district, like the Artisan District hyperlinked, may help to achieve this goal.
4. Planning recommends that La Plata note that its Historic District Boundary designation (CH-326) was determined eligible for placement on the National Register of Historic Places in 1998. The NR-Eligibility Review Form provides background research that might compliment the reference on page 4 about La Plata's historic downtown, and the Community Design reference to historical resources in the Visions

section on page 5. A total of 125 contributing resources were identified in the NR survey.

5. Planning recommends revising the projected land use categories to encompass all densities, or that the town be mindful that any subsequent zoning accommodates the full range of desired densities. For example, the current residential land use densities on page 21 leave a gap between 2-3 (low density) and 4-6 (medium density) dwelling units per acre (d.u.a). Increasing the range of density allowable for Low Density Residential Areas from “2 to 3 d.u.a. or less” to “2 to 4 d.u.a or less (pg. 21-22)” could remove this gap.
6. On page 22, the calculation totals for acreages needs to be rechecked. When adding the land use categories listed on page 22, Planning calculated 7,860 and not the stated 7,850.
7. Planning recommends that the referenced green infrastructure shown on Map 6 included in the Sensitive Areas Element (starting on pg. 33) be combined as an overlay on Map 2 on page 24, to provide a visual tool that shows the inter-relationship, perhaps as an appendix. This will allow a reader of the Plan to better connect future land use plans with sensitive land areas the town wishes to protect.

Municipal Growth Element:

1. Planning commends the town for revising their potential municipal growth areas, as well as the advancement of mixed-use development in the new subdivision and in downtown redevelopment projects.
2. On page 30, Planning calculated a total of 4,956 for the municipal growth area acres in Table 3, as opposed to the 4,960 acres stated in the accompanying text.
3. Planning would like to add the following information. “Population in La Plata is projected to increase by 3,500 through 2040 (equivalent to about 1,264 residential units, assuming 2.77 people per household in Charles County in 2020; reference: August 2017 household size projections, Maryland Department of Planning, see <https://planning.maryland.gov/MSDC/Documents/popproj/AVGHHSIZEProj.pdf>, based on annexation and municipal growth area development, as described in the Municipal Growth Element (MGE). A projected additional 4,361 residential units could be constructed at full build-out capacity within the growth areas.”
4. On page 37, Map 6: Green Infrastructure appears to have an outdated municipal growth quadrant boundary shown. Please update the map with the new quadrant boundaries as shown on page 29 so they are consistent.
5. In comparing the town’s 2012 Growth Tier Map to Map 3 (page 28), Planning generally recommends a Tier II designation for growth areas with county-planned sewer service and a Tier IIA designation for municipal growth areas planned for sewer service that are not yet in the county water/sewer plan. It should be noted that portions of the revised Northeast, Northwest, and Southeast Quadrant municipal growth areas (pg. 29) include land designated as Tier III in Charles County’s Growth Tier Map. Planning recommends that the town collaborate with the county to ensure that the county’s adopted tier map reflects any revisions to the town's tier map.
6. This draft references the MDP Development Capacity Summary Report, 5/29/2019 (footnote, page 30) when discussing the potential dwelling units at full build-out. The

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footnote on page 30 notes that it “does not include PC added growth areas”. Please define what PC added growth areas are.

7. Planning understands that the town has been devoting a lot of attention to their Growth Areas, and Planning is available to assist as these conversations continue.

Environmentally Sensitive Areas Element:

1. Planning encourages the town to consider referencing the current “Areas of Critical State Concern” list as discussed within the A Better Maryland plan at <https://abetter.maryland.gov/plan/pages/areas-of-critical-state-concern.aspx>. Through A Better Maryland, state agencies deemed these as important areas for collaboration between Maryland and its jurisdictions.
2. Planning commends the Plan for supporting environmental protections and demonstrating the value that environmental resources have on both quality of life and the economy of the town.
3. On page 34, the Plan mentions greenways as “protected from development” which conflicts with the Map 6 (page 37) reference to “green infrastructure.” Green infrastructure includes both protected and unprotected lands. If the town wishes to show all “green infrastructure” on Map 6, all portions of protected land should be shown as well. Planning and the Department of Natural Resources (DNR) can provide the town with GIS data to assist with visualizing all protected areas.
4. Map 6 appears to have the old municipal growth quadrant boundaries. Please update the map with the new quadrant boundaries as shown on page 29.
5. For the maps on pages 35-38, the town should include the data source and data vintage year for each item that is displayed.

Water Resources Element:

1. Planning commends the Plan for adequately describing how La Plata has implemented changes since the 2009 comprehensive plan to meet the state’s legislative requirements related to the 2009 finalization of the Chesapeake Bay Total Maximum Daily Loads (TMDLs) (pgs. 41-42).
2. The Plan effectively evaluates La Plata’s current demand for water resources and the projected demand at full residential build-out for the additional four growth areas but does not yet identify methods to address regulatory limits that currently constrain the ability of the town to implement its proposed land use plan.
3. This section should include a short discussion and identification of suitable receiving waters to accommodate the proposed land use plan.
4. Map 4 Tier II Watersheds on page 35 is a more informative map to use than the map on page 45 to discuss watershed types, and to highlight which portions of the receiving waters are designated as Tier II waterbodies. Planning recommends replacing the map that is currently included on page 45 with the one on page 35.
5. Planning suggests the Plan discuss potential ways to address the gap between the Municipal Growth Element residential full-build out scenario (4,361 EDUs) and the limitations of the permitted TMDL and the current water supply appropriation permit, especially given the management constraints per the Maryland Department of Environment (MDE).

6. This section would benefit from a calculation and discussion of the full build-out for commercial and industrial components of the growth scenarios and how water, sewer, and stormwater capacity and permit limits would be impacted and addressed. For example, Figure 5 on page 43 is limited to projected water demands for residential full build-out. Guidance regarding calculating non-residential demand projections can be found in [MDE Water Supply Program's Guidance for Preparing Water Supply Capacity Management Plans Revised June 2013 \(see page 25\)](#), and [MDE's Guidance Document re: Wastewater Capacity Management Plans, 2006 \(see page 21\)](#).
7. Planning suggests that the town evaluate and describe how it will mitigate forest cover loss, as mentioned on page 41 in the Plan.
8. Descriptions of the water supply demand and wastewater discharge demand on, respectively, pages 42 and 45–46 identify mid-range and high growth scenarios. However, these mid-range and high growth scenarios are not described in the MGE. An explanation of the mid-range and high growth scenarios should be provided. In addition, the growth scenario regarding the projected population increase of 3,500 described in the MGE (pg. 28) should be explained.
9. Consider utilizing nutrient limits instead of hydraulic design capacity to estimate future constraints. For example, the “Projected Wastewater Demands” figure (pg. 46) y-axis could be described as total nitrogen in pounds per year (or in pounds per day, depending on the TMDL measurement) rather than as Waste Water Treatment Plant (WWTP) capacity in Millions Gallons per Day (MGD); or a table could be used instead of a graph to show over time demand, total nitrogen loading, and total nutrient discharge after system improvements. Doing so will facilitate planning and decision-making by La Plata for actions to take (see Goal #10 on page 47) to address the limitations of the permitted TMDL to accommodate implementation of the town’s land use plan.
10. Evaluate ways to offset/mitigate the gap between the TMDL permitted WWTP discharges and the growth scenarios—e.g. system repairs, spray irrigation, capacity credits and nutrient trading (see Goal #12 on page 48).
11. Clarify whether the sewer connections for the 15 town septic systems and the 492 growth/annexation area septic systems are included in the “Projected Wastewater Demands” figure (pg. 46) for the full build-out scenario bar.
12. In addition, the Water Resources Element should evaluate how capacity credits or nutrient trading could be used when connecting these septic properties to the sewer system to earn credits to increase the overall WWTP discharge.
13. Prior to choosing a land use plan option and finalizing its comprehensive plan, the town should discuss with MDE the feasibility of actions to take (see Goals #10, #12) to address the limitations of the permitted TMDL, and the feasibility of increasing its appropriation permit or accessing other water sources. If these limitations are not feasible to overcome, the town should consider modifying its land use plan.
14. Planning suggests that the town discuss the identification of suitable receiving waters and land areas or the best land use plan option for the existing and future land uses and

growth (per Land Use Element and MGE) to minimize pollutant transport to receiving waters. For example, the changes in impervious cover and forest cover based on projected land use and municipal growth scenarios could be evaluated as an estimate of the net increases (or decreases) in stormwater discharges, and to facilitate selection of the best land use plan.

Transportation Element:

1. Planning commends the town for including multimodal transportation goals and actions to address the major transportation challenges identified in the plan.
2. Planning commends the Plan for including the existing transit service which is already available. The town, in working with Maryland Transit Administration (MTA), should address the adequacy of current services including park and ride lot capacities and any potential actions needed to enhance these transit services.
3. To help address Goal # 15, the town may want to consider including strategies which address emerging transportation technologies and their impacts on transportation planning, e.g., electric vehicles (EVs), connected and autonomous vehicles (CAVs) and shared-mobility services (e.g., Uber and Lyft). La Plata may want to explore if transportation network companies' service, such as Uber or Lyft, can be used to enhance demand-response public transportation service to benefit the elderly, disabled and low-income seeking employment. In addition, as demand for senior housing increases due to aging population, La Plata should consider a strategy that encourages locating senior housing development within proximity to the "Community and Campus Zone for Hospitals and Health Care Facilities (Goal # 3.1)."
4. Regarding Goal #16 and the desire to encourage increased non-motorized travel such as walking and bicycling, it was not clear whether the town has developed a complete streets policy. Complete streets policy encourages roadway facilities to be designed for safe passage of all users, not just the automobile. A complete streets policy would address several transportation goals such as encouraging walking and bicycling (goal #16) and supporting economic development (goal #15). For more information on complete streets and context sensitive solutions, please visit SHA's web page: <https://www.roads.maryland.gov/mdotsha/pages/Index.aspx?PageId=332>
5. Regarding Goal # 18, how does the town envision supporting and extending the Southern Maryland Rapid Transit Project to downtown La Plata? Will this involve working with the County or Tri-County Council to help educate the public on the benefits of transit on land use, traffic congestion and related greenhouse gas emissions? Would the town promote transit-supportive development? Considering these issues can help the town to support and advocate the potential extension of the transitway to the town.
6. In the context of making proactive roadway connections, the CSX tracks may be viewed as both a constraint and an opportunity.
 - a. Has the town considered CSX's Pope's Creek Branch as a potential light rail extension? What types of land uses would be most appropriate located near the tracks?

- b. When studying locations for at-grade crossing locations, this may be an appropriate time to consider where potential station locations and park and ride facilities may be needed.
7. Planning appreciates the town's goal to make La Plata a walkable community. It would be helpful to clarify the responsibilities (e.g., the state, local jurisdictions, and private developers), funding mechanisms, timeframes and prioritization for proposed roadway, sidewalk or trail improvement projects.
 - a. Information on how the town plans on funding new non-motorized facilities would be beneficial. SHA's Transportation Alternatives Program may be a funding option for sidewalk construction. More information can be found at <http://www.roads.maryland.gov/Index.aspx?PageId=144>.
8. La Plata may want to include a Transportation Demand Management (TDM) strategy to encourage car-pools, telework, flexible work hours/schedules, and addressing the need for park and ride lots expansion (if any) for transit services and car-/van-pools. We suggest the town work with MDOT and major employers that the commuters/residents work for through the Commuter Program (<https://www.mta.maryland.gov/commuter-programs>) to reduce the need for SOV and long distance travel.

Community/Municipal Services and Facilities Element:

1. In Municipal and Community Services & Facilities Element Goal #19 (pg. 63) action item #2 could be strengthened by noting what diversity parameters are the goal. For example, "The town would like a representative sample of the town's age/racial/economic makeup as part of the group of residents to serve on its boards..."

Housing and Community Development Element:

1. Planning commends La Plata on the actions that have come to fruition since the comprehensive plan approval in 2009, particularly in the areas of adopting an accessory dwelling unit ordinance, expanding the Sustainable Community land area to include all of the 192 acres in the downtown area, and working with the Urban Land Institute to form a Technical Assistance Panel to focus on redevelopment.
2. Planning recommends adding language in this section to discuss Goal #24 (pg. 17) specifically to "address the housing needs of those who are currently living in hotels and are underserved in the housing market." The recommendation below further explains.
3. The passage of HB-1045 has resulted in the requirement of a Housing Element in all local comprehensive plans adopted after June 1, 2020, which includes the requirement for the housing needs analysis for low-income and workforce housing, using the definitions contained within the Bill. Since it is anticipated that this comprehensive plan will be adopted after June 1, 2020, Planning recommends that the town evaluate the draft Plan's housing element for conformance with the requirements of HB-1045. One stated action that may benefit from a closer look is Goal #24, Action 2, which

notes that the town should address the housing needs of those living in hotels. Planning is in the process of developing a Housing Element Models & Guideline document to address recent legislation (HB 1045), which is expected to coincide with the legislative mandate of June 1, 2020. Please see <http://mgaleg.maryland.gov/mgaweb/Laws/StatuteText?>

Economic Development Element:

1. Planning notes that the goals and actions of the Economic Development Element appear reasonable and achievable.
2. Planning commends the use of connecting the goals for downtown core economic growth (page 68) to be linked to the land use projections map on page 24.
3. Increasing economic vitality and viability with goals such as a home-based business zoning ordinance idea is a strong goal that can help La Plata be a leader in such a new industry shift (page 68).
4. Economic Development goals are appropriately matched to projected demographics from the Municipal Growth Element on page 27.
5. Planning would like to note that a portion of the Southern Maryland Heritage Area lies within town limits. The Southern Maryland Heritage Area Tourism Management Plan was adopted and made a part of the comprehensive plans of Charles, Calvert and St. Mary's Counties in 2003. This update of the Plan, when adopted by the town, incorporates by reference all portions of the Southern Maryland Heritage Area Tourism Management Plan, except those portions solely relating to other jurisdictions within the Heritage Area, as part of the Plan.

Recreation and Parks Element:

1. The Recreation and Parks Element of the Plan is brief because it incorporates the 2011 *Town of La Plata Comprehensive Parks & Recreation Master Plan* by reference. Since that plan was adopted, however, Charles County adopted a *Land Preservation, Parks, and Recreation Plan* (LPPRP) in September 2017, and findings that pertain to La Plata in the county plan should be included in Recreation and Parks Element of the town's comprehensive plan.
2. Planning's review of the Charles County LPPRP reported that the proximity analysis showed that La Plata fell within a ten-minute drive (good access, approximate five-mile radius) or within a ten-to-twenty-minute drive (good to moderate access, approximate 10-mile radius) for all the facilities mapped: Athletic fields, basketball courts, water access, picnic sites, and trails. The town also showed the highest levels of parks and recreation density.
3. The county's 2017 LPPRP could also be mentioned in Goal #29 (page 69) and Goal #31 (page 70) of La Plata's Recreation and Parks Element. These goals currently recommend consulting the 2011 *La Plata Comprehensive Parks and Recreation Master Plan* to determine the types of facilities needed in the town and "needs as related to the new development under the town's development regulations" (page 70). Perhaps the Recreation and Parks element could recommend that the 2017 LPPRP also be consulted.
 - a. The county 2017 LPPRP might be useful for the town's Recreation and Parks Element in other ways:

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- b. The county's recreation survey of 2017 may contain results that could be disaggregated to be statistically significant for La Plata alone.
 - c. The town's site inventory should be compared to the county's site inventory in Appendix D of the county LPPRP to ensure that they both contain all the sites in La Plata.
4. The Plan should refer to town park and recreation projects (if any) that are included in the county Capital Improvement Plan approved budgets for fiscal years 2017-2021.
5. The Plan might also add a sentence or two about how town and county work together to provide for town recreational facilities.
6. As for information already in the Plan's Recreation and Parks Element, the remaining goals and other portions of Goals 29 and 31 are good. Among the strengths is acknowledgement of the need to provide recreation for different generations and for "those who may not be as mobile and need the physical activity" (page 69-70).
7. On page 70, the image map should have a figure number or title for reference and clarify.

Implementation Plan and Capital Improvements:

1. Planning commends La Plata on the addition of such a strong implementation section, which clearly ties back to each goal stated in the document and has the ability to show and track actions needed, budgeting information, and a completion target date.
2. MDE has denied past requests from La Plata for an increase in their water appropriation permit due to management level and conservation concerns regarding the Coastal Plain aquifers with patterns of decline, including the Lower Patuxent aquifer. Planning will contact MDE about this topic to coordinate our assistance to the town. Planning is willing to facilitate a discussion between the town and MDE.
3. Planning recommends including La Plata's Historic District designation and its potential resources from the National Register of Historic Places / NR- Eligible Survey.

END MARYLAND DEPARTMENT OF PLANNING COMMENTS

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Draft 2019 Town of La Plata Comprehensive Plan**

STATE AGENCY COMMENTS

The following pages contain comments from other State agencies in support of the Maryland Department of Planning (Planning) review of the Draft 2019 Town of La Plata Comprehensive Plan as part of the standard 60-day review period for municipalities and non-charter counties. Comments not included here may be submitted under separate cover, or via the State Clearinghouse. If comments from other agencies are received by Planning, they will be forwarded to the County in a timely manner.

Attachments

Page 14 Maryland Department of Transportation

Page 17 Maryland Department of Housing & Community Development

Page 18 Maryland Historic Trust

April 13, 2020

Ms. Sara Lipkin Sularz
Maryland Department of Planning
301 W. Preston Street, Suite 1101
Baltimore MD 21201

Dear Ms. Sularz:

Thank you for coordinating the State of Maryland's comments on the 2019 City of La Plata Comprehensive Plan, hereafter referred to as the "Plan". The Maryland Department of Transportation (MDOT) offers the following comments from The Secretary's Office, MDOT State Highway Administration (MDOT SHA), and MDOT Maryland Transit Administration (MDOT MTA).

General Comments:

- The MDOT SHA is in support of the Plan's general focus on improved bicycle and pedestrian accessibility, the facilitation of transit use, the improved connectivity of streets, and improved bicycle/pedestrian facilities. Overall, the recommendations proposed in the Plan are consistent with MDOT SHA's context-based guidance, which places significant emphasis on the provision of transportation that accommodates users of all modes.

Specific Comments:

Other Documents Reviewed

- Page 9 – The Plan refers to two different Maryland Consolidated Transportation Program (CTP). On page 9, the Fiscal Year (FY) 2020 – 2025 DRAFT CTP, but on page 55, the Plan references the FY 2019 – 2024 capital program. Please update with the current CTP FY 2020-2025 CTP.

Summary of 2019 Comprehensive Plan Goals and Actions

- Page 10 – Recommend clarifying text in Goal #1 and #2 as recommendation reads to maximize parking requirements.
- Page 15 – Goal #15 MDOT SHA should be made aware if they are not already that this plan wants to improve access management along Crain Highway (US 301).
- Page 15 – Goal #16 MDOT should be made aware of the recommendation for a high priority request for sidewalks to be built on the east side of Crain Highway (US 301).

- Page 16 – Goal #18 should be expanded to consider other regional connections, including via commuter bus service. Encouraging commuter bus service is significant as both routes that serve La Plata have unmet capacity and can support additional ridership.
- Page 16 – Goal #18 should be expanded to identify local transit service goals for VanGo.

Transportation Element - Transit Services

- Page 52 – Confirmed the numbers for ridership and trips by commuter bus were correct. Confirmed the ownership of the La Plata Park and Ride facility by MDOT MTA.
- Page 53 – Regarding Figure #9, the map does not clearly indicate the location of bus stops.

Local and Regional Plans and Priorities

- Page 55 – Regarding Table #5, the Plan calls for the streetscape improvements and various traffic and pedestrian improvements along Charles Street (MD 6) from Darley Drive to US 301 (#7), which is the main spine in the downtown area. For future coordination regarding these improvements, please contact Ms. Michelle Vrikkis, Assistant District 5 Engineer-Traffic, at 410-841-1043 or MVrikkis@mdot.maryland.gov.

Pedestrian Safety

- Page 56 – Please spell out define “ULI TAP report”.

Goals and Actions

- Page 56 – Regarding Goal 15, Caroline Street should be changed Caroline Drive.
- Page 57 – Regarding Goal #16, continue to make La Plata a very walkable community. The Plan calls for the provision of sidewalks along northbound US 301 from La Plata Plaza north to Rosewick Road (approximately 3700 feet) and from 6620 Crain Highway to Talbot Street (approx. 810 feet). These improvements and other pedestrian accommodations should be evaluated further to assess the pedestrian needs along the corridor and to identify any safety concerns that might pose challenges to installing these sidewalks. Also, right-of-way acquisition, permitting, and access issues would need to be resolved prior to moving forward. For future coordination regarding these improvements, please contact Mr. Erich Florence, Assistant District 5 Engineer-Project Development, at 410-841-1044 or EFlorence@mdot.maryland.gov.

Ms. Sara Lipkin Sularz
Page Three

Part 3: Implementation Plan & Capital Improvements

Continue to Make La Plata a Walkable Community, Goal/Action #16.3

- Page 85 – An action item for the State was to work with property owners on Charles Street and Washington Avenue for delineation of parking spaces from pedestrian areas. If this is not a state-owned street, it is recommended that La Plata take the lead on this action item, and MDOT could provide technical assistance if needed.

Thank you again for the opportunity to review the Plan. If you have any questions or concerns, please do not hesitate to contact Ms. Kari Snyder, Regional Planner, MDOT Office of Planning and Capital Programming (OPCP) at 410-865-1305, toll free at 888-713-1414, or via email at ksnyder3@mdot.maryland.gov. She will be happy to assist you.

Sincerely,



Heather Murphy
Director, OPCP, MDOT

cc: Mr. Erich Florence, Assistant District Engineer, District 5, MDOT SHA
Ms. Kari Snyder, Regional Planner, OPCP, MDOT
Ms. Michelle Vrikkis, Assistant District Engineer, District 5, MDOT SHA



LARRY HOGAN
Governor
BOYD K. RUTHERFORD
Lt. Governor
KENNETH C. HOLT
Secretary

April 1, 2020

Mr. Joseph Griffiths, Manager of Local Assistance and Training
Maryland Department of Planning
301 West Preston Street, 11th floor
Baltimore, MD 21201

Dear Mr. Griffiths:

Thank you for the opportunity to review the Town of La Plata Comprehensive Plan Draft (the Plan). The comments below are based on a review of the plan by staff in the Maryland Department of Housing and Community Development (DHCD) Division of Neighborhood Revitalization.

In general, the plan appears to be thorough and well written. However, staff have some specific comments regarding the text, below:

The inclusion of a housing element in the draft clearly strengthens the draft plan. It should be noted that House Bill 1045, passed in 2019, will require local comprehensive plans adopted starting June 1, 2020 to include a housing element addressing the need for affordable and workforce housing (Attachment A). The Town should consider expanding the housing element specific in the current plan to address affordable and workforce housing. Staff at the Maryland Department of Planning are currently drafting guidance for local governments to prepare the housing element. Staff at the Maryland Department of Housing and Community Development can also provide guidance regarding resources to support affordable housing development.

Again, thank you for the opportunity to comment on the Plan. If you have any questions regarding our comments, please call me at 410-209-5807 or via email at john.papagni@maryland.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John Papagni".

John Papagni
Program Officer
Division of Neighborhood Revitalization

Attachment A: House Bill 1045 (2019) - Land Use – Comprehensive Plans – Housing Element

Cc: Sarah Lipkin Sularz, MDP
Oumy Kande, MDP
Jaffa Weiss, DHCD





Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary

April 2, 2020

Ms. Sarah Lipkin Sularz
Southern Maryland Regional Planner
Maryland Department of Planning
301 West Preston Street, Room 1101
Baltimore, MD 21201

Dear Ms. Sularz:

Thank you for the opportunity to review the 2019 Town of La Plata Comprehensive Plan and submit comments on behalf of the Maryland Historical Trust.

The plan is silent regarding the La Plata Historic District (CH-326) which was determined eligible for placement on the National Register of Historic Places in 1998. The NR- Eligibility Review Form provides background research that might compliment the reference on page 4 about La Plata's historic downtown, and the Community Design reference to historical resources in the Visions section on page 5. A total of 125 contributing resources were identified in the NR survey.

Please consider including information about the state and federal tax credit programs for historic properties, noting that eligibility for or listing in the National Register of Historic Places is helpful in qualifying properties for federal and state financial incentives. The Heritage Structure Rehabilitation Tax Credit's Small Commercial program, designed to help fund modest rehabilitation projects, may deserve special mention since projects are frequently undertaken in smaller, Main Street-type communities. Details about these programs can be found on the Maryland Historical Trust website at <https://mht.maryland.gov/taxCredits.shtml>.

It appears that part of the Southern Maryland Heritage Area lies within the town limits. In the economic development section, we recommend adding the following language to meet the statutory requirement that local jurisdictions must include, by reference, the approved Heritage Area Management Plan in comprehensive or master plans (Financial Institutions Article, Title 13, Subtitle 11, Annotated Code of Maryland, § 13-1111 (e)):

“The Southern Maryland Heritage Area Tourism Management Plan was adopted and made a part of the comprehensive plans of Charles, Calvert and St. Mary's Counties in 2003. This update of the comprehensive plan, when adopted by the Town, incorporates by reference all portions of the

Southern Maryland Heritage Area Tourism Management Plan, except those portions solely relating to other jurisdictions within the Heritage Area, as part of the comprehensive plan.”

Thank you again for the opportunity to comment on the plan. If you have any questions, please contact me at (410) 697-9561 or steven.allan@maryland.gov

Sincerely,

A handwritten signature in black ink, appearing to read 'Steven H. Allan', written in a cursive style.

Steven H. Allan, AICP
Local Assistance and Training Planner
Office of Planning, Education and Outreach

Cc Nell Ziehl, Chief, Office of Planning, Education and Outreach
Joseph Griffiths, MDP
Oumy Kande, MDP