

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor



Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary

Maryland DEPARTMENT OF PLANNING

October 26, 2020

James Thompson, Chairman
P.O. Box 653
41770 Baldridge Street
Leonardtown, MD 20650

Re: Draft 2020 St. Mary's County Comprehensive Plan Amendment

Dear Mr. Thompson:

Thank you for the opportunity to comment on the draft 2020 St. Mary's Comprehensive Plan amendment, and your participation in the State agency plan review process. The Maryland Department of Planning (Planning) believes that good planning is important for efficient and responsible development that successfully addresses resource protection, adequate public facilities, community character, and economic development. Planning notes that our comments are intended to support and enhance internal consistency of the plan resulting from the proposed text changes.

Planning also notes that the county also submitted an amendment to its Comprehensive Water and Sewerage Plan and a Priority Funding Area Exception request related to the same desire to extend public sewerage service to failing septic systems. Planning understands that the three submissions are related, and encourages the county to consider responses from both Planning and the Maryland Department of the Environment together as it continues to plan for the public health and safety of its residents in the affected areas.

The Department forwarded a copy of the draft 2020 St. Mary's Comprehensive Plan amendment to several State agencies for review including, the Maryland Historical Trust, Commerce, Environment (MDE), Natural Resources, Housing (DHCD), and Transportation (MDOT). To date, we have received comments from MDE, DHCD, and MDOT; and these comments have been included with this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

Please consider that Planning's attached review comments reflect the agency's recommendations and observations on ways to strengthen the County's Plan, as well as satisfy the requirements and intent of the State Land Use Article. Planning respectfully requests that this letter and accompanying review comments be made part of the County's public hearing record. Upon adoption of any plan amendments, please submit an electronic copy of the 2020 Comprehensive Plan to Planning.

Please feel free to contact me at (410) 767-4500 or Sarah Lipkin Sularz, Regional Planner, at (410) 767-3837.

Sincerely,


Charles W. Boyd, AICP
Director, Planning Coordination

cc: James R. Guy, President, Commissioners of St. Mary's County
William Hunt, Director, Land Use and Growth Management
Joseph Griffiths, AICP, Local Assistance and Training Manager



Maryland DEPARTMENT OF PLANNING

Maryland Department of Planning Review Comments

Draft 2020 St. Mary's County Comprehensive Plan Amendment October 26, 2020

The Maryland Department of Planning (Planning) has reviewed the draft amendments to the 2010 St. Mary's County Comprehensive Plan (Plan) and offers the following comments for your consideration. These comments are intended as suggestions to improve the draft comprehensive plan and better address the statutory requirements of the Land Use Article. Other state agencies as noted have contributed comments, which are attached. If comments from other agencies are received, Planning will forward them to the County.

Summary of the Draft 2020 Comprehensive Plan Amendment (2020 CPA)

The 2020 CPA is focused on supporting the future health, safety, and welfare in certain areas of the county where onsite sewage disposal systems (OSDS) are failing, and/or the potential for OSDSs is hindered through the existence of high water tables and soils with poor drainage conditions. While the 2020 CPA does not specify the location where the failures or potential failures are occurring, Planning is aware through a concurrently submitted Comprehensive Water and Sewerage Master Plan (Water and Sewer Plan) Amendment and Priority Funding Area (PFA) Exception, that the problem is affecting the Compton area of the county. The county, in partnership with the St. Mary's County Metropolitan Commission (MetCom), is also expanding the St. Clements Shores Wastewater Treatment Plant (WWTP) to address these public health and safety issues. The 2020 CPA updates the count of WWTPs serving the county from four to seven, inserting the Charlotte Hall, Forest Farms, and Airedale Road facilities.

The amendment incorporates new policies for extension of public sewerage systems outside of the county's designated growth area. These new policies make frequent reference to the establishment of PFA Exception areas as a strategy for serving the above described communities with public sewerage systems. The 2020 CPA is careful to note in multiple places that in such PFA Exception areas, the provision of public systems should not induce development of greater intensity or density, or out of character with, existing development. The amendment adds that the county should adopt a preventative maintenance program to anticipate problems with failing septic, to maintain a healthy environment for residents. Finally, the 2020 CPA removes a policy permitting the transfer

of development rights from lots that are unbuildable due to environmental or dimensional constraints.

Minimum State Law Requirements for Municipalities in Non-Charter Counties

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 amended sections of the Comprehensive Plan include limited pages within Chapters 1 (Trends), 2 (Successes and Challenges), 4 (Land Use and Growth Management Element), 5 (Sensitive Areas Protection Element), and 7 (Water Resources Element [WRE]).

General Comments

The following comments provide context and background to the multiple and interwoven factors effecting the planning for this area of the county.

- Throughout the amendment, there are references to establishing a “Priority Funding Area (PFA) exception area.” It should be noted that Subtitle 5-7B of the State Finance and Procurement Article limits certain state agencies, such as Maryland Department of the Environment (MDE), from funding growth-related projects including infrastructure capacity improvements and economic community development assistance to only those areas within locally designated PFAs. Many of the amendments in this 2020 CPA use language that directs the county to establish a PFA Exception Area and use the “PFA Exception process.” PFA Exceptions refer to projects, not areas, and must be approved by the Smart Growth Coordinating Committee. Planning strongly suggests that the county change all references to PFA Exception Areas in the 2020 CPA to “Sewer Problem Areas.” Planning made the same suggestion in our review letter (dated October 9, 2020) of the Draft St. Clements Shores WWTP Expansion 2020 amendment to the Water and Sewer Plan.
- If public funds are needed for the expansion of wastewater treatment plants, rezoning the residential properties they serve to meet the PFA criteria of 3.5 units per acre, adding them to the county growth area, and amending the Water and Sewer Plan to provide service within ten years would make them eligible for PFA designation.
- The amendment states there are currently seven wastewater treatment plants in the county, increased from four in the adopted 2010 Comprehensive Plan. This proliferation of WWTPs in the county could be indicative of the need for expanding the county growth area and increasing residential zoning density as needed to facilitate PFA designation, and therefore access to state funding.
- Planning suggests that the county consider the adoption of a growth tier map to proactively address future concerns over OSDS failures. A growth tier map is required by the Sustainable Growth & Agricultural Preservation Act of 2012 if a

jurisdiction wishes to develop major subdivisions on septic. By mapping areas appropriate for such subdivisions on septic, and those that are not, the county could better identify where and how it can direct public sewerage infrastructure in support of its growth and public health and safety objectives.

Chapter 1: Trends

- In section 1.2.5 (C) "Water Resources and Wastewater Treatment Facilities" (page 1-9), consider amending the description of the problem area to include the properties as explained, described, and mapped in the recently approved PFA exception application.

Chapter 2: Successes and Challenges

- Vision 7. C. (page 2-14) states that "Providing new public sewer service outside a growth area can only be done with a Priority Funding Area exception area." This statement is inaccurate and conflates state funding requirements with county sewer policy. Please note that a PFA designation or a PFA exception is only required to access state funding for a growth-related project (i.e. MDE's Bay Restoration funds or MDE's Revolving Loan and Grant funds). Local sources can fund new public sewer service outside of a PFA. The comprehensive water and sewer plan is the planning tool that governs the establishment of service areas and phased provision of service through service categories.
- Consider adding information to Chapter 2: Vision 8. Funding Available to Achieve These Visions in the Plan, that corresponds to amendment text found in Chapter 5. Sensitive Areas Protection Element 5.3 Adherence to the Visions of the Planning Act (page 5-7). For example, the inclusion of Bay Restoration Funding sources.
- Vision 7. C. (page 2-14) only addresses connection of already developed properties (i.e., not vacant lots or future subdivided lots) so the policy language should be expanded to address these lots, as they may face the same soil and water table issues as the existing developed properties.

Chapter 4: Land Use and Growth Management Element

- Section 4.1.1 Goal: Concentrate Development in Suitable Areas (page 4-3) I. Policy - As described, PFA Exceptions must be approved at the state level. Planning does not recommend that the county consider them as a standard strategy to address failing septic systems. The process is lengthy, and approval is not guaranteed. Instead, Planning recommends the county consider analyzing communities with current and potentially failing OSDSs for potential addition to the county growth area. In some instances, this may make them eligible for PFA designation, and therefore able to access state funding without the need for a PFA Exception. In other instances, an increase in residential zoning densities may need to accompany the inclusion of the properties in the growth area to make them eligible for PFA designation.
- Section 4.1.1 – As with the amendment to Chapter 2, Section 1.2.5 described above, the added text relating to consideration of a PFA exception area in this section

focuses only on existing development (not potential new development on vacant lots or due to subdivision of parcels). Planning recommends that the policy language be expanded to encompass vacant and future lots of record in this section as well. As previously noted, "PFA exception area" should be changed to something like "sewer problem area."

- Section 4.1.2 - Planning interprets the new policy language in this section as an indirect means to address potential new development on vacant lots or the subdivision of parcels within state-approved PFA exception areas. If that assumption is correct, Planning notes that the language seems to not address, within PFA exception areas, the lots that do not get consolidated (The county writes that lot consolidation is voluntary under the policy listed here) or new lots that are subdivided from parcels. Clarification will be helpful, as the additions from Section 4.3 and 4.4 might be addressing these types of situations, but Planning is unsure. Planning recommends again not conflating the need for a PFA exception for state funding with the county policy to extend sewer service outside of the growth area to address an environmental problem with failing OSDS. Please provide a clearly stated policy in the 2020 CPA regarding sewer service, within the Sewer Problem Areas, to vacant lots and parcels with subdivision potential.
- Section 4.3 Neighborhood Conservation Areas (page 4-8) adds text to indicate "redevelopment and residential and nonresidential infill must be consistent with the existing character of the neighborhood or area." Planning recommends further elaborating and defining the intent for this statement. For example, is maintaining the "existing character" meant to keep the density and development patterns the same; or to keep the visual aesthetic the same, or both?
- Sections 4.3, 4.4, and 4.5 include text that aligns with the Maryland Department of Housing and Community Development's (DHCD) community revitalization programs and goals. See DHCD comments attached to this review for more information.
- Section 4.5 - The language here describing when a PFA exception area can be pursued should be consistent with the language proposed in Chapter 2, unless intended to have a different meaning. If that is the case, Planning requests the county to clarify the statement.
- The 2020 CPA amendments include the following additional language on pages 4-9-4-10, "If a PFA exception area for sewer is established outside a growth area, redevelopment or infill must be consistent with the existing character of the area." Although this statement may indicate that the PFA exception and public sewer connection policy will not result in additional development, it is vague. It is important for the Land Use and Growth Management Element and the Water Resources Element (WRE) to convey how estimated growth or the build-out estimate aligns with water and sewer demand and available capacity. Planning recommends an addition to the WRE amendment text regarding whether, and how, the new policies about PFA exceptions and public sewer connections will affect public sewer demand.

Chapter 5: Sensitive Areas Protection Element

- No comments from Planning or other agencies.

Chapter 7: Water Resources Element (WRE)

- The revisions to the WRE add language incorporating the county's priority to connect failing or anticipated future failing OSDSs to public sewer via PFA exceptions, when replacement of the OSDS either on-site or off-site on a property owned by the same property owner, is not possible. To ensure that the public sewer connections are possible when warranted, the WRE revisions also address providing sufficient capacity at public WWTPs to accommodate the failing and potentially future failing OSDS lots. (Note that the amendment revisions for Chapter 1 indicate that the St. Clements Shores PFA exception area public sewer connections will be addressed via an expansion at the existing St. Clements WWTP.) By establishing PFA exception areas (recommend renaming), the county will be able to allow public sewer connections to properties located outside the established growth area boundary, but only when an existing or potential future health hazard is identified. The WRE revisions define areas appropriate for PFA exceptions (should reference sewer problem areas) to allow public sewer connection as those with high groundwater tables and low soil permeability, and lots that are too small to support replacement of the existing OSDS. It is strongly recommended changing the PFA exceptions references to something like "sewer problem areas," which emphasizes the failing of OSDS and not conflate this problem with an implementation funding option, i.e. state funding.
- Section 7.1 - Planning recommends the added text be modified to add the words "financial and technical" prior to the word "viability".
- Section 7.6.1(i)(B)(d) – It is unclear what the scope of "a preventative maintenance program" would be and if it is focused on extending the effectiveness of existing OSDS on a case-by-case basis or if this action could be more system and county wide. Planning recommends the county consider including an action statement for a phased, coordinated assessment of failing OSDS countywide, like what Anne Arundel County conducted approximately ten years ago. If interested, Planning staff will facilitate connecting you with the appropriate Anne Arundel County staff regarding this effort. A countywide strategic assessment of failing OSDS should involve more than just the St. Clements Shore area but should systematically evaluate countywide if the sewer problems experienced in St. Clements Shore are being experienced by other parts of the county. Based on that assessment, a long-term strategy to address the failing OSDS problems countywide can be developed and incorporated into the county's Comprehensive Water and Sewer Plan.
- Section 7.6.1(B)(iii)(b) – Planning recommends deleting the statement, "When this situation exists outside a growth area, apply for a PFA exception area." As mentioned before, PFA exception is part of the process of pursuing state funding

which may be part of the financial strategy for a particular project. However, pursuit of state funding should not be conflated with the county policy of determining whether the county should extend public sewer to serve the failing OSDS in an area. If this formal review process does not exist in the county's Comprehensive Water and Sewer Plan, it may be appropriate to establish a formal process of evaluating failing OSDS in an area first and determine the most appropriate solution to the problem. Planning can provide examples other jurisdictions have established, if interested. Extension of public sewer might be the solution, but there are other options depending on the circumstances. It seems appropriate the county's comprehensive plan could generally reference the need for the process and then include an action statement for the process to be included in the Comprehensive Water and Sewer Plan for the evaluation of failing OSDS areas and recommendation of remedial steps.

- Section 7.6.C, Planning notes that vacant lots and parcels with subdivision potential, but within a problem area in regard to high water table and soils with poor drainage potential, are also not addressed in this policy. Only existing developed lots are addressed: those with failing OSDSs, and those with OSDSs that are not failing and do not have adequate land area and soil conditions to allow for a replacement septic system.

Other Recommendations Affecting the WRE

- Planning recommends that the county analyze whether the failing OSDS and the extension of public sewer service to these areas will affect Total Maximum Daily Loads (TMDLs) and include that information in the WRE.
- The Plan, Appendix 4, page A-10 indicates that the county commissioned a map of all impervious surfaces and forest coverage, which was expected to be completed by 2010. Planning recommends that the 2020 CPA include the information from the study and a statement about how the new policies about failing OSDS sewer problem areas, and public sewer connections will affect growth and development, and the resulting expected changes to impervious surface cover and forest cover.
- Planning has added text from Dorchester County's draft comprehensive plan at the end of our review (below summary). This text is from that county's draft comprehensive plan, and demonstrates their proposed policies for extending sewer service to address public health and safety concerns. St. Mary's County may find this text useful as it considers revisions to the text of its draft amendment.

Summary

In conclusion, Planning finds that the proposed amendment to the 2010 Comprehensive Plan addresses the issue of failing OSDSs on existing platted and developed lots, but it falls short of providing guidance on the provision of public water and sewer extensions for vacant lots and parcels with subdivision potential in areas where known high water table and soils with poor drainage exist. Planning suggests further analysis of the potential for providing services to platted lots and for properties within problem areas that propose subdivision in the future. Any alternative programs to subdivision such as the transfer of development rights and rural and agricultural preservation programs, including the identification of properties in the problem areas to avoid development, could be given higher priority in these strategies.

Draft Dorchester Co Comp Plan

Land Use Chapter

Land Use Strategy

Extend public sewer service to areas with failing individual or shared sewage systems, including failing BIPS, and provide land use and development restrictions for these areas so as not to foster unintended growth such as limitations on lot sizes or equivalent dwelling unit connections as a future threshold for service

(Within Growth Tier Map Section) - Extensions of Public Sewer

As described above, the Rural Residential, Agricultural Conservation and Resource Conservation Land Use Districts are not intended to be served with public water or sewer. Within each of these land use districts, however, there are areas that are experiencing failing on-lot, community or shared sewage systems. This is especially true in portions of the Resource Conservation District (see Chapter 5 - Water Resources Element). Certain areas within the Resource Conservation District are already served with public sewer that was previously extended to address failing systems and it is anticipated that additional areas will need to be served within the life of this Comprehensive Plan. As stated in the Water Resources Element, it is the intent of this Plan to take measures which will abate the discharge of raw sewage onto the surface of the ground or into the groundwater from existing bermed infiltration ponds (BIPS) or other on-lot or community sewage systems that are in a state of failure and create a threat to public health and safety and are a potential harm to the environment and water quality. Nothing in this Land Use Chapter should be interpreted to prevent or discourage the extension of public sewer into or within the Rural Residential, Agricultural Conservation or Resource Conservation Land Use Districts to address failing systems as described above and as described in the Water Resources Element. In addition, this Land Use Chapter recognizes and adopts the policy as stated in the Water Resources Element regarding the connection of lots of record to sewer lines extended to serve problem areas to permit one single family dwelling or one equivalent dwelling for non-residential uses.

Rural Residential – Areas of low to medium-density residential development near municipalities and development corridors where public services can be efficiently provided. The County does not anticipate extensions of public water or sewer systems for these areas except for the need to mitigate failing shared septic systems.

Extend public sewer service to areas with failing individual or shared sewage systems, including failing BIPS, and provide land use and development restrictions for these areas so as not to foster unintended growth such as limitations on lot sizes or equivalent dwelling unit connections as a future threshold for service

WATER RESOURCES CHAPTER

Denied Access Lines and Priority Funding Areas

Based on the Land Use Plan described in Chapter 3, any public sewer extensions to service failing on-lot sewer systems or failing shared facilities encompass areas within the Resource Conservation, Agricultural Conservation and/or Rural Residential Land Use Districts. This would most likely be the case with the actual sewer collection and conveyance piping as well as the area of failing on-lot systems to be served. None of these land use districts are intended to be served with public sewer and are most likely not designated as Priority Funding Areas (PFAs). Given the fact that State funds, through the traditional State Revolving Loan Program and/or the Bay Restoration Fund, would be used as a funding source for these types of projects, a PFA exception from the Governor's Smart Growth Coordinating Committee is required as a condition of funding. The PFA law explicitly recognizes the need to use State funding for projects outside PFAs to address public health and safety issues for drinking water system improvements and sewer system improvements. In the past, land use policies related to resource and/or agricultural land use districts within County Comprehensive Plans have been impediments to the granting of PFA exceptions even when a clear public health and safety issue exists. However, a recently approved PFA exemption was granted to Dorchester County in 2019 to allow for funding and assistance in the mitigation for sewer service connection to take the McKeil Point area off of a shared bermed impoundment area that is in failing condition.

Wastewater Strategies

Extend public sewer service to areas with failing individual or shared sewage systems, including failing BIPS, and provide land use and development restrictions for these areas so as not to foster unintended growth such as limitations on lot sizes or equivalent dwelling unit connections as a future threshold for service.

COMMUNITY FACILITIES CHAPTER

Extend public sewer service to areas with failing individual or shared sewage systems, including failing BIPS, and provide land use and development restrictions for these areas so as not to foster unintended growth such as limitations on lot sizes or equivalent dwelling unit connections as a future threshold for service.

**Maryland Department of Planning Review Comments
October 25, 2020
2020 Comprehensive Plan Amendments**

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 2020 St. Mary's Comprehensive Plan Amendments** as part of the standard 60-day review period for Code 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 town in a timely manner.

Attachments

- | | |
|---------|---|
| Page 10 | Maryland Department of Environment (MDE)(checklist) |
| Page 12 | Maryland Department of Housing and Community Development (DHCD)(letter) |
| Page 13 | Maryland Department of Transportation (MDOT)(letter) |

**LAND AND MATERIALS ADMINISTRATION
RESPONSE TO CLEARINGHOUSE PROJECTS**

Project Assigned To	Jennifer Hopper	
Project Review SAI#	MD20200828-0758	
County/Location	St. Mary's County	Comp Plan
Received in LMA	9/2/2020	
Due Date to OC	9/23/2020	
PLEASE NOTE:	<input type="checkbox"/> COPY <input type="checkbox"/> CIRCULATED THRU ADMINI.'S <input type="checkbox"/> DUE ASAP	

(Check if Applies): C1_____ R1 X R2_____ R3_____ R4_____

- X ¹Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land and Materials Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
- X ²If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
- X ³Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.
- ⁴The proposed project is located near land on which sewage sludge was stored, land applied, or disposed under a sewage sludge utilization permit issued by the Land and Materials Administration. Specific questions regarding this site should be directed to the Sewage Sludge Division at (410) 537-3314.
- X ⁵The Resource Management Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
- ⁶CERCLA listed site MD-#_____, (name)_____,
(Address)_____, is located within approximately ____ miles of
(Site/Project being reviewed)_____. Contact the Land Restoration Program at (410) 537-3437 for more information.
- X ⁷Any contract specifying “lead paint abatement” must comply with Code of Maryland

Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1978 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.

— ⁸MDE requests that efforts be made to prevent contamination of the surface and ground water of the State of Maryland during any proposed construction and renovation activities. In the event that spills or other releases of petroleum or hazardous materials occurs from the proposed operations which may potentially impact State waters, MDE requests prompt notification at 1-866-633-4686 (toll free).

X ⁹The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please Land Restoration Program at (410) 537-3437.

— ¹⁰The project may cause contaminated runoff from an animal feeding operation (AFO). Please contact the AFO Division at (410) 537-4423 to determine if this AFO will require registration under the General Discharge Permit for Animal Feeding Operations.

— ¹¹The project will result in increased numbers of confined animals at this animal feeding operation (AFO) and therefore necessitate registration under the General Discharge Permit for Animal Feeding Operations. Please contact the AFO Division at (410) 537-4423 to determine if this AFO will require registration under this permit.

X ¹²Borrow areas used to provide clean earth back fill material may require a surface mine permit. Disposal of excess cut material at a surface mine may requires site approval. Contact the Mining Program at (410) 537-3557 for further details.

— ¹³Any project that will remove coal from the site as part of the exaction will require review by the Department. Contact the Mining Program at (410) 537-3557 for further detail.

Additional Specific Comments:

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DEPARTMENT OF HOUSING
AND COMMUNITY DEVELOPMENT

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

September 23, 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 St. Mary's County Amendment to the 2010 Comprehensive Plan (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. The changes address the character of infill development, limit non-farm residential development outside of the growth areas, and establish standards for residential subdivision development outside of growth areas to ensure compatibility with the surrounding rural and community character. In general, the plan amendments appear to be consistent with growth management principles and community revitalization objectives. Amendments that are particularly relevant to community development goals and objectives include:

- 4.3 Neighborhood Conservation Areas. Redevelopment and infill development that enhances and is consistent with the character of existing communities aligns with DHCD's community revitalization programs.
- 4.4 Rural Preservation Goals Objectives and Policies. Again, redevelopment and infill development that enhances and is consistent with the character of existing communities aligns with DHCD's community revitalization programs.
- 4.5 Development Guidelines. To the extent that water and sewer is extended to existing rural residential communities, this aligns with the Department's charge to strengthen existing communities.

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

Sincerely,

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

John Papagni
Program Officer
Division of Neighborhood Revitalization

Cc: Sarah Lipkin Sularz, MDP
Rita Pritchett, MDP



MARYLAND DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2 NORTH CHARLES, SUITE 450 • BALTIMORE, MD 21201201 • DHCD.MARYLAND.GOV
(P) 410-209-5800 • 1-800-756-0119 • TTY/RELAY 711 or 1-800-735-2258

Sarah & Rita,

The information provided for the subject St. Mary's Comprehensive Plan Amendment has been reviewed for potential impacts to MDOT assets, including highway, bicycle, transit and environmental reviews. MDOT's Transportation Business Units and TSO have decided to not make any formal comments on the subject plan. The information includes amendments to a previously adopted (April 6, 2010) St. Mary's County 2010 Comprehensive Plan. The amendments to the Comprehensive plan are related to general County sewer upgrades and improvements. The amendments do not describe any actual projects nor do they appear to have any direct impact on any MDOT assets. At this time, no further review of this plan is recommended.

Thank you for the opportunity to review and comment. If we receive any further reviews, we will forward them to you.

Dan Janousek

Regional Planner, Metropolitan Planning

Office of Planning and Capital Programming

7201 Corporate Center Drive

Hanover, MD 21076

O 410.865.1098

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