



Maryland Department of Planning

Martin O'Malley
Governor

Anthony G. Brown
Lt. Governor

Richard Eberhart Hall
Secretary

Matthew J. Power
Deputy Secretary

November 21, 2011

Ms. Fran Johnson, Clerk
Town of Preston
P.O. Box 91
Preston, Maryland 21655

Dear Ms. Johnson:

Thank you for the opportunity to comment on the draft Comprehensive Plan amendment for the Town of Preston. This 2011 draft amendment updates the adopted 2005 Plan (with 2010 Water Resources Element amendment), to now include the Municipal Growth Element (MGE), as required by House Bill 1141. In addition to this amendment to include an MGE, the Town proposes to amend the Comprehensive Plan to include the "Stories of the Chesapeake Heritage Area Management Plan" as an appendix to the Town of Preston Comprehensive Plan.

The Maryland Department of Planning (MDP) has analyzed the Plan's draft MGE and it appears as if this draft element meets the requirements of HB1141, however, the Department has provided specific review comments to the Town which may strengthen the draft MGE. MDP has also reviewed the proposed Heritage Area Management Plan amendment, and has provided comments to properly address the issue of incorporating the Heritage Area Management Plan into the Town's Comprehensive Plan.

The Department forwarded a copy of the Preston draft amendment to a number of State agencies for review including, the Maryland Historical Trust and the Departments of Transportation, Environment, Natural Resources, Business and Economic Development, Housing and Community Development, and Agriculture. To date, no State agencies have provided comments to the proposed Comprehensive Plan amendment. State agency comments received after the date of this letter will be forwarded to you upon receipt.

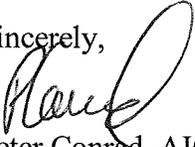
Please keep in mind that the attached review comments reflect MDP's thoughts on ways to strengthen the Town's MGE, as well as satisfy the State requirement for the incorporation of the "Stories of the Chesapeake Heritage Area Management Plan" into the Town's Comprehensive Plan.

MDP understands that a Public Hearing has not yet been scheduled; however, it is our wish that you add our comments to the record of any future hearing. Furthermore, MDP also asks that the Town consider our comments as revisions are made to the draft Plan amendment, and to any future plans, ordinances, and policy documents that are developed.

Ms. Fran Johnson, Clerk
November 15, 2011
Page 2 of 2

Please contact me at (410) 767-4500 or Keith Lackie, Regional Planner for the Lower Eastern Shore, at (410) 713-3460.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Conrad", written over a large, light-colored circular scribble.

Peter Conrad, AICP
Director, Local Government Assistance

Enclosure: Comments on the Comprehensive Plan for the Town of Preston

cc: Kim Gadow, Preston Town Manager
Katheleen Freeman, Caroline County Planning Director
Tracey Gordy, Director, MDP LES Regional Office
Rich Josephson, Director, MDP Planning Services
Rita Elliott, MDP Clearinghouse
File



**Maryland Department of Planning
Review Comments
Draft 2011 Preston Comprehensive Plan Amendments
November 21, 2011**

Municipal Growth Element (MGE) Comments

Population Projections:

- The plan does a nice job of discussing several population projection scenarios, ultimately assuming a 2030 population of 928 persons. The plan should consider explicitly stating that it is assuming this (928 persons) projection, as text within Page 7 does not clearly indicate the chosen scenario.
- On Page 7, the text references Table 6. This is a typo and should state Table 5 (the final population growth projection). The table should be edited to include overall change in projected population, an increase in 231 persons from 2010 to 2030.

Development Capacity Analysis:

- MDP commends the Town for including a development capacity analysis. This analysis estimates potential for 263 units within the Town (Table 7, Page 9), and anticipates 101 dwelling units for the projected growth, derived by adding the anticipated dwelling units from new development as found in Table 8.
- It is recommended that Table 8 include totals for the entirety of the time frame for population change and anticipated increase in dwelling units.

Potential Annexations/Growth Area:

- The plan lists two potential annexations, totaling 196 acres (increasing the existing acreage of the Town by over half its current size). While the properties/areas discussed support the listed objectives on Page 10, given that the Town has enough capacity within the current municipal limits and the limitations of the wastewater treatment plant, MDP recommends postponing any annexation until the WWTP capacity issue is resolved. At the very least, the Town should place a timeframe for these annexations. Furthermore, consideration of how the proposed growth areas will affect the infrastructure and public

facilities, and an analysis of the total development capacity in these growth areas, is warranted.

- The Town should consider putting a more detailed map of the potential annexation areas in the plan, one at a larger scale and with parcel information. The existing Map 4 (Areas for Potential Annexation 2010-2030) does not seem to graphically correlate with the text describing these growth areas. On Page 11, the text describes the northern growth area as 134.7 acres and the southern growth area as 61.3, yet the map depicts the southern growth area as nearly three times larger than the northern growth area.

Resource Lands/ Rural Buffer:

- The plan includes a brief discussion of the importance of agricultural land and the Town has included a rural resource buffer. MDP commends the Town for stating the desire to establish a Transfer of Development Rights program, and partnerships with MET and ESLC to continue to conserve resource lands. It may be beneficial to include the acreages of these resource and rural buffer lands.

Relationship of MGE to Water Resources Element (WRE):

- The Town's MGE forecasts 231 new residents and 101 new dwelling units between 2010 and 2030 (Table 8). The MGE provides a build-out estimate of 263 new dwelling units within its infill area, but does not provide a build-out estimate for its growth areas. The Town's adopted WRE bases its water and sewer demand projections based on the MGE's build-out estimate of 263 new dwelling units within its infill area and also a build-out estimate of 49 dwelling units within the growth areas (Preston WRE, pp. 4 and 6). The MGE should note that the build-out estimate for its growth areas is 49 dwelling units.
- The MGE should indicate that the WRE includes water and sewer demand projections through the 2010-2030 time period, but only evaluates the impact of 72 new dwelling units during that time period (Preston WRE, pp. 4 and 6) given current 5-year planning designations in the County water and sewer plan (Preston WRE, p.2).

General Comments on MGE:

- Some of the data provided within the draft MGE should be updated to reflect more current information. As an example, there are references to the Town needing to "first estimate the 2010 population" (Page 7) when, indeed, 2010 Census data has been released. Another example of the need for providing more current data would be within the School Enrollment and Capacity data, which reflects 2009 enrollment, when more current data is available. On Page 13, the draft MGE refers to a Public Safety Building as

being “anticipated to be completed by 2010”. Consideration should be given to using as current data as available throughout the document.

- On Page 2, the legend in the “2004 Existing Land Use Map (Town)” has a formatting error. The word “vacant” is of a different font and size than the other land use categories.
- On Page 8, “Table 6. Residential Zoning Performance” has a format issue (outside of the table is an errant “*”).
- On Page 14, within the third line of the second paragraph of the “Water and Sewerage Facilities” section, there is a typo, “refer” is misspelled.

Stories of the Chesapeake Heritage Area Management Plan Comments

- During previous discussion between the Town and MDP Lower Eastern Shore Regional Office Staff, MDP recommended a different approach for the Town to incorporate the Heritage Area Management Plan into the Town’s Comprehensive Plan. It was MDP’s suggestion that the following statement be incorporated into the Comprehensive Plan (as opposed to placing the entire Heritage Area Management Plan as an appendix to the Comprehensive Plan):

“The Stories of the Chesapeake Heritage Area Management Plan” dated ????, and as may be amended from time to time in the future, is hereby incorporated, by reference, in the Town of Preston’s Comprehensive Plan.

This above, bolded, language, is the comprehensive plan boilerplate language the MDP is recommending to all jurisdictions within certified heritage areas to help alleviate the necessity for comprehensive plan amendments each time heritage area plans are updated or boundaries are revised. This language should be incorporated into the Town’s Comp Plan at an appropriate location in the Plan. Some jurisdictions insert it in an economic development section and others in a community character section, depending upon the Plan and its chapters. The recommended language should not be within an appendix.

- Should the Town choose not to utilize the suggested language, provided above, MDP finds two critical issues with the method suggested by the Town. First, the information provided by the Town indicates that the December 1, 2004 document is a “Public Draft Management Plan” (emphasis added). Any document incorporated within the Comprehensive Plan should not be a “draft” document. The second issue is that the document provided by the Town appears to only be an “Executive Summary”, and therefore, may not satisfy State requirements. It is strongly suggested that the methodology and **bolded language** provided above be utilized by the Town, for the reasoning previously provided.