

Comments on the Calvert County Comprehensive Plan, December 2018 Draft
 Additional Agency Comments through February 25, 2019

NAME	AGENCY	DATE RECEIVED	# OF PAGES
Mr. Ron Klauda, Vice Chair	Calvert County Environmental Commission	2/21/2019	4
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John Papagni, Program Officer Division of Neighborhood Revitalization	Maryland Department of Housing and Community Development	1/24/2019	2
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Amanda Redmiles, Interdepartment Information Liaison / Public Information Act Coordinator, Office of Communications	Maryland Department of the Environment		2
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Harry Wedewer, Committee Chairperson	Calvert County Heritage Committee	2/24/2019	2
	Calvert County Agricultural Preservation Advisory Board	2/25/2019	4

Harrod, Felicia R.

From: Ronald Klauda <rjklaua@gmail.com>
Sent: Thursday, February 21, 2019 7:29 AM
To: Planning and Zoning
Cc: Hager, George W. "Will"
Subject: Comments from Calvert County Environmental Commission on December 2018 Draft Comp. Plan Update
Attachments: EC Comments on Dec. 2018 draft Comp. Plan 21feb2019..docx

TO: Mr. Greg Kernan (Chair of the Calvert County Planning Commission)

The Environmental Commission submitted 62 comments to the Planning Commission on the July 2018 draft Comprehensive Plan Update. Thank you for considering our comments, for accepting several recommendations, and for directing staff to incorporate them into the current (December 2018) version.

Comments from the Environmental Commission on the December 2018 draft Comp. Plan are attached for your consideration.

Sincerely,

Ron Klauda (Vice-Chair, Calvert County Environmental Commission)

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**Comments/Recommendations from the Calvert County Environmental Commission
on the December 2018 Draft Comprehensive Plan Update
(21 February 2019)**

Chapter 1 – Purpose, Mission, and Visions

Pg. 1-6: The Environmental Commission recommends that the word/concept “sustainability” be explicitly mentioned in some of the 10 visions.

Chapter 2 – Key Issues (no comments/recommendations)

Chapter 3 – Land Use (no comments/recommendations)

Chapter 4 – Environment and Natural Resources

Pg. 4-2, 4th paragraph: The Environmental Commission recommends that the 2nd sentence be rewritten to read as follows: “Although the dollar value of the ecological services provided by natural resources can be debated, this value is often much greater than their commercial returns.”

Pg. 4-13, Section on Air Quality: There is another important air quality issue that should be included here: indoor airborne radon. Radon is a colorless, odorless noble gas that cannot be seen, smelled, or tasted but can seep into homes and other buildings from underlying soils and bedrock. Radon is formed by the natural radioactive decay of radium-226 in the uranium-238 decay series. The radon isotope of interest (radon-222) has a half-life of 3.8 days and is linked to an increased risk of lung cancer. Airborne radon is found everywhere in Maryland, including Calvert County (<https://maps.health.maryland.gov/phpa/eh/radon/>). Fortunately, it is easy and inexpensive to test for indoor airborne radon levels and determine if mitigation is needed to reduce elevated levels. To protect the public, the Environmental Commission recommends that the County consider requiring all home sales to include radon testing.

Chapter 5 – Heritage

Pg. 5-2: In the section titled “Sustainability Approach”, the Environmental Commission does not understand how the phrase “The greenest building is the one that is already built” captures the relationship between our heritage resources and sustainability. Talking about the “greenest building” or “green building” in this chapter on Heritage seems out of place.

“Green building” is a topic that would be more appropriately discussed in Chapter 6 – Housing. The Environmental Commission recommends that this important component of sustainable development be added to Chapter 6.

Green building involves creating structures using materials and processes that are environmentally responsible and energy efficient throughout a building’s life cycle---from siting to design, construction, operation, renovation, and deconstruction. Green building practices complement and expand upon traditional building design concerns for economy, utility, durability, and comfort. Green buildings can also be viewed as sustainable and high performance. They are designed to reduce their overall impacts on human health and the natural environment. There are also economic and social benefits associated with green building practices. They can make use of recycled materials in construction, create healthy

indoor environments with minimal pollutants, and feature landscaping designs that reduce water usage.

Chapter 6 – Housing

The Environmental Commission recommends that the concepts of “green buildings’ and “green building practices” be added to this chapter, as suggested in our comments on Chapter 5 above.

Pg. 6-3, 1st sentence of the 1st paragraph: The Environmental Commission recommends that the phrase “**and strive to conserve water and reduce energy consumption**” be inserted after “landscapes”.

Chapter 7 – Transportation

Pg. 7-9, 1st paragraph: The Environmental Commission recommends that these two sentences: “**MDOT has identified 14 candidate bay crossings that are now being evaluated. Four of these candidate crossings have a western terminus in Calvert County.**” after the third sentence.

Rewrite the sentence that begins with “Constructing...” to read as follows: “**Constructing a bay crossing in Calvert would have an enormous negative impact on the county’s rural character, would regularly cause massive traffic jams on an already periodically-congested MD 4 - MD 2/4, would endanger the health and well-being of County residents if an emergency evacuation is required due to a disaster at the Calvert Cliffs Nuclear Power Plant or the Dominion LNG Plant, and is totally incompatible with Goal 2 and many other aspects of the County’s Comprehensive Plan.**”

Calvert County should seize the opportunity during this important update of the Comprehensive Plan to officially ‘nip in the bud’ any plans that MDOT might be considering for a bay crossing with a western terminus in the County. There is ample justification for not wanting a bay crossing here, so that message should be made ‘loud and clear’ now. Also, including language in the Comp. Plan Update, along the lines of what the Environmental Commission is recommending above, will be consistent with the views of the Planning Commission and Board of County Commissioners on this topic.

Chapter 8 – Economic Vitality

Pg. 8-11: In this section on “Solar Energy”, the Environmental Commission recommends that language should be included that articulates and clearly communicates an inspired vision and sound policy for where clean, renewable energy production projects, like solar, should be sited in Calvert County. To that end, the Environmental Commission recommends that a list of priority locations be included here, rather than only promoting the siting of large solar panel arrays on agricultural lands. Solar energy development should be encouraged in Calvert County and other parts of the U.S. to reduce emissions of carbon dioxide (CO₂) associated with burning coal, oil, and gas to produce electricity. CO₂ and other greenhouse gases are causing global warming and the associated adverse impacts from climate change. Productive farmland soils and crops, like forests and wetlands, sequester CO₂ that would otherwise be released into the atmosphere, provide other important ecosystems services, and should therefore not be promoted as suitable sites for solar projects.

In addition to encouraging homeowners to install solar panels on their roofs or in their yards, there are many other locations for solar array installations that the County should prioritize and encourage, including the following:

- Roof tops of commercial and government buildings
- Disturbed/developed open land not being tilled
- Unproductive farmland
- Closed and capped municipal landfills
- Solar canopies installed in parking lots that will also provide shade and weather protection for cars parked beneath them as well as supply energy for electric vehicle charging stations
- With proper design, solar projects can be compatible with rotational grazing of sheep and free-ranging poultry
- Certain vegetables like kale can be successfully grown under solar panels
- In high-voltage transmission line corridors that are not providing meadow habitat

A useful guide to siting solar energy projects can be found at this link:

(https://www.scenichudson.org/sites/default/files/renewables-siting-guide_web.pdf)

Pg. 8-17, Objective 4: The Environmental Commission recommends adding a 3rd subobjective (8.1.4.3) that reads as follows: “Identify and prioritize non-farmland and non-forest areas/locations where solar arrays could be sited with minimal environmental impacts.”

Chapter 9 – Water Resources (no comments/recommendations)

Chapter 10 – Government and Community Facilities (no comments/recommendations)

Chapter 11 – Implementation

Pg. 11-6, Objective 2, Subobjective 4.1.2.1: The word “consider” is weak. The Environmental Commission recommends rewording this statement to read as follows: “Determine if the floodplain protection level should be raised.”

Pg. 11-7, Objective 3: In the Environmental Commission’s comments on the previous draft version of the Comp. Plan Update, we recommended adding a 3rd Subobjective to read as follows: “Restore degraded stream channels.” That recommendation was apparently rejected, so the Environmental Commission is repeating it now. We agree that streams can be “protected” by maintaining undeveloped buffers and preserving/restoring riparian forests. But, badly-degraded stream channels that are deeply incised and no longer adequately connected to their flood plains would require much more than intact riparian forests to be “restored”.

Pg. 11-15, Objective 1: The Environmental Commission strongly recommends adding a new Subobjective (7.3.1.3) that reads as follows: “Oppose the siting of a western terminus for a new Chesapeake Bay bridge anywhere in Calvert County.” As we stated in our comments on Chapter 7 above, there is ample justification for this new Subobjective to be added to the Comp. Plan Update.

Appendix (no comments/recommendations)

Harrod, Felicia R.

From: Joseph Griffiths -MDP- <joseph.griffiths@maryland.gov>
Sent: Friday, February 22, 2019 4:41 PM
To: Planning and Zoning; Chuck Boyd -MDP-
Subject: State Agency 60-Day Review Comments (Draft Calvert 2040 Comprehensive Plan)
Attachments: Draft Calvert 2040 Comprehensive Plan Review-Combined State Agency Comments (February 2019).pdf

Calvert County Planning Commissioners and Staff,

Attached please find the combined state agency comments on the Draft Calvert 2040 Comprehensive Plan. The Maryland Department of Planning asks that you make this part of the public record in preparation for the February 26 Planning Commission Public Hearing.

Please let me know if you have any additional questions.

Thank you



Joe Griffiths, AICP
Local Assistance and Training Manager

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Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary

February 22, 2019

Mr. Greg Kernan, Chair
Calvert County Planning Commission
175 Main Street
Prince Frederick, MD 20678

Re: Draft Calvert 2040 Comprehensive Plan

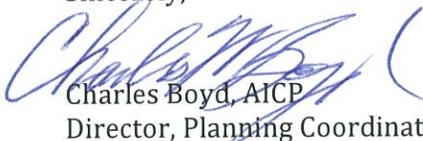
Dear Mr. Kernan,

Thank you for forwarding the Draft Calvert 2040 Comprehensive Plan for 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 County's efforts to preserve its rural landscape, create vibrant Town Centers, and incorporate sustainability principles in its comprehensive plan.

The Department's Planning Coordination and Planning Data and Research Divisions have reviewed the updated draft and prepared comments for Calvert County planning staff and the Planning Commission. Planning also forwarded a copy of the draft plan to several state agencies for review including the Maryland Historical Trust (MHT) and Department of Commerce. To date, we have received general comments from the Departments of Environment, Natural Resources, Transportation, and Housing and Community Development. We expect to receive MHT's comments early next week and will forward them to you under separate cover. Any additional state agency comments will be forwarded upon receipt.

Please consider that Planning's attached review comments reflect our recommendations on ways to strengthen the County's plan and assist in its successful implementation. If you have any questions, please feel free to contact Joe Griffiths, Local Assistance and Training Manager, at 410.767.4553.

Sincerely,



Charles Boyd, AICP
Director, Planning Coordination

Cc: Pat Keller, Assistant Secretary for Planning Services
Joseph Griffiths, Local Assistance and Training Manager

Maryland Department of Planning Review Comments
February 22th, 2019
Draft Calvert 2040 Comprehensive Plan

The Maryland Department of Planning (Planning) has reviewed the Draft Calvert 2040 Comprehensive Plan (Plan) and offers the following comments for your consideration.

Minimum State Law Requirements for 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 following checklist summarizes an assessment of how and where 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 Calvert 2040 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.	10-1
(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	5-1
(c) a goals and objectives element	L.U. § 3-102(a)(1)(iii)	L.U. § 3-110 -- Goals and objectives element	2-1
(d) a land use element	L.U. § 3-102(a)(1)(iv)	L.U. § 3-111 -- Land use element	3-1

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 Calvert 2040 Comprehensive Plan page references
(e) a development regulations element	L.U. § 3-102(a)(1)(v)	L.U. § 3-103 -- Development regulations element	These are generally referenced in the Growth Areas section, 3-10
(f) a sensitive areas element	L.U. § 3-102(a)(1)(vi)	L.U. § 3-104 -- Sensitive areas element	4-2
(g) a transportation element	L.U. § 3-102(a)(1)(vii)	L.U. § 3-105 -- Transportation element	7-1
(h) a water resources element	L.U. § 3-102(a)(1)(viii)	L.U. § 3-106 -- Water resources element	9-1
(i) a mineral resources element, IF current geological information is available	L.U. § 3-102(a)(2)	L.U. § 3-107 -- Mineral resources element	4-13
(k) for counties only if located on tidal waters, a fisheries element	L.U. § 3-102(a)(4)	L.U. § 3-113 -- Fisheries element	Discussion in Economic Vitality chapter, 8-9
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	L.U. § 3-102(b)	L.U. § 3-102(b)(2)(i)	Hazard Mitigation element 4-15 Housing element 6-1

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 Calvert 2040 Comprehensive Plan page references
priority preservation area (PPA) element			
(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	Integrated with chapters throughout Plan
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		3-7
Additional: (5) Sustainability Approach in the Comprehensive Plan Element			ES-1

General Comments

It is Planning's intent that these comments provide insight and guidance to the plan drafters and planning commissioners. Note that any outstanding comments submitted as part of previous draft reviews still apply.

Overall, the plan is well organized, legible, and demonstrates good development of rational planning concepts.

Planning offers the following general comments:

- Throughout its planning history, Calvert County has demonstrated a dedication to Smart Growth. From Maryland's original transferable development rights (TDR) program in 1978 to its ambitious preservation goals, the county is an example of forward-thinking and integrated planning. Calvert 2040 continues this tradition and supports Maryland's 12 visions. As the county continues to work toward more vibrant Town Centers, Planning hopes to work as an ally in place-based community development that preserves Calvert's natural resources and rural character and strengthens its existing communities and growth areas.
- Planning commends the county for adding a sustainability approach to this comprehensive plan, including, as described on page ES-1, the three Es of equity, economics, and environment. In addition, Calvert 2040 does a good job of explaining the sustainability approach used for each chapter. Where possible, the plan could discuss recommendations in terms of all three sustainability dimensions for each topic (e.g. Land Use, Community Facilities, Water Resources) that have been identified. Often only one of the Es is described for a given topic, when a more integrated approach to sustainability may be applicable. For example, expanding solar array development could provide green jobs to individuals of all incomes, re-use vacant land, offset utility costs, achieve PSC mandates and work toward less reliance on fossil fuels. Maryland Energy Administration has a useful tool, Smart DG mapping tool <http://pprp.info/SmartDG/Index.htm> that identifies promising areas for the location of new wind, solar, and combined heat and power projects. Property Assessed Clean Energy (PACE) financing may be a potential tool to realize these benefits on a greater scale to consumers. Because sustainability is interdependent upon multiple elements, the interrelatedness of issues could benefit from more in-depth discussion.
- Calvert 2040 frequently explains goals and objectives in terms of their definition, rather than through evaluation and analysis. Where objectives are identified, actionable steps for achieving these outcomes should be presented and indicators measuring progress identified. The plan could also identify potential tools, resources, and other stakeholders that could assist with achieving the objectives.
- Avoid generalizations or subjective statements. For example, 8-15 states, "This would encourage entrepreneurship and increase the number of start-up small businesses in Calvert County. It would also incentivize people to create jobs for themselves rather than waiting for jobs to be created for them." While it is true that entrepreneurship

initiatives can assist local job creation, the assertion that such strategies will change individual economic behavior may be overstated.

Executive Summary

- For the first sentence under sub-head *Managing Residential Growth* (page ES-3), consider making this small change: “Implementation of the previous Comprehensive Plan policies has contributed to reducing the county’s growth ~~rate for~~ in population and households, which has continually decreased since its peak in the 1970s”

Chapter 2 Key Issues

- Planning applauds the county for an extensive and thoroughly documented public outreach program (starting on page 2-3) and the dedication to maintain a robust public communication system through plan implementation (Goal 1 Page 10-16). The connections between community input and plan formulation and objectives are clearly described, as is the decision-making process for reconciling conflicting stakeholder feedback.

Chapter 3 Land Use

- Planning supports the county’s detailed description of the need to update Town Center Master Plans (small area plans) for consistency with Calvert 2040 and to reflect current demographic and market conditions (starting on page 3-17). It is important that comprehensive and small area plans maintain consistency to ensure the proper application of policy and development strategies, and Planning believes that these update processes will be a crucial first step in plan implementation and achieving the stated value of vibrant town centers.
- Planning appreciates Calvert 2040’s explanation of the 2016 development capacity analysis the department completed to support the formulation of this plan. However, starting on page 3-12 and continuing throughout the Land Use Chapter, it is not always clear how the county used the results of that analysis, nor the chosen scenarios 4 and 6, to formulate plan policies, goals, and objectives.
- The county’s currently adopted growth tier map (Figure 3-1) should be amended given some inconsistencies between the proposed land use classifications in the Future Land Use Plan (Figure 3-4) and the tier map. For example, Planning’s Geospatial Data and Analysis Division has identified areas in Figure 3-4 that were designated Farm and Forest and are not yet designated as Tier IV. Based on coordination with county planning staff in January 2019, Planning understands that Calvert intends to amend the adopted tier map following the comprehensive rezoning process. Although the law requires the tier map to reflect all changes to the local adopted land use plan, Planning recognizes the county’s concerns that the comprehensive rezoning process, once complete, might not exactly match the vision of the new land use plan: this discrepancy would result in inconsistencies between the tier map and zoning if the county chooses to amend its tier map before the comprehensive rezoning process occurs. Planning will maintain communication with Calvert staff throughout the land

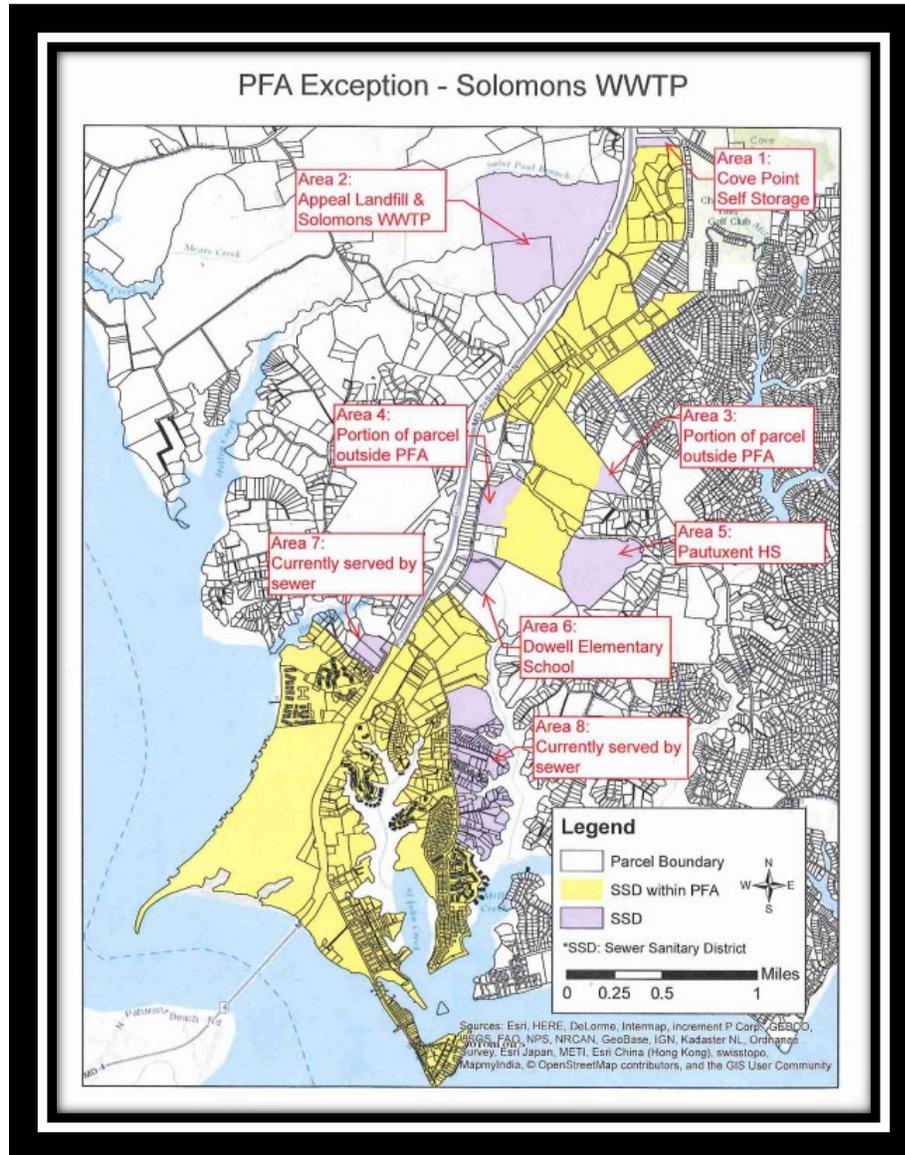
use plan approval and comprehensive rezoning processes to provide guidance on, and stay informed of, any concurrent updates to the county tier map.

- The plan thoroughly details how, where, and when Major Town Center boundaries are intended to be expanded (starting on page 3-17). However, the county may want to consider including an explanation of how these proposed expansions will help create more vibrant town centers, per the plan's stated value.
- Figure 3.2 illustrates that 59% of residential building permits issued in 2010-2015 were outside the county's designated Priority Funding Area (PFA). The plan suggests that there are options to re-direct growth (page 3-8), but does not explain how these options were identified, nor provide policies to achieve them. What policies or actions can this plan recommend for reversing that trend, given that this has not produced the desired development patterns or community character? Additional comments related to Calvert 2040's stated value of creating vibrant town centers (page ES-1) are as follows:

- Comparing *Figure ES-1: Future Land Use* and *Figure I-2: Calvert County Priority Funding Areas and Priority Preservation Areas*, it does not appear that the PFA boundaries match the extent of the proposed expanded Major Town Center boundaries. Page I-6 acknowledges this inconsistency by saying "the geographic areas of Town Centers and the one-mile radii are not exactly comparable to the Priority Funding Areas" However, the Land Use Goals and Objectives, starting on page 3-23, do not propose expanding the county PFAs to correspond with the Major Town Centers. Calvert may want to consider matching the two as a potential strategy.
- Based on the Maryland Smart Growth Coordinating Committee's (Committee) condition, several of the non-PFA sewer service areas (portions of Areas 3, 4, 7 and 8 in Figure 1 below) can only be designated as PFAs if they are within the county's designated growth areas and provide for a base density of at least 3.5 dwelling units per acre. Chapter 3 describes the Major Town Center land use category as growth areas with a conventional density of 3 dwelling units per acre, which can be increased according the Town Center Master Plan using TDRs. The Committee however, which oversees PFA designation, cannot use densities achievable only through TDRs to ascertain PFA eligibility. PFA determination must be based on "by right" allowed zoning density.
- The county can address the Smart Growth Coordinating Committee's condition through two options. The first approach is for the county to set the base density for Major Town Centers at 3.5 dwelling units per acre, which is not significantly higher than 3 dwelling units per acre. (Please let us know if Planning can provide technical assistance and educational examples of residential development densities of 3.0 vs. 3.5 dwelling units per acre to help in community discussions of this issue.) This approach not only would meet the Committee's condition, but by designating the areas as PFAs, it would also assure the county of the availability of state funds for important amenities and services (e.g., streetscaping, strategic demolition, sewer) in the Major Town Centers at some point in the future. The second approach is for the county to maintain the base density of its Major Town Centers (3 dwelling units per acre) and to instead amend its water and sewer plan to add language that the areas in

question will be allocated a certain amount of the Solomons Island Waste Water Treatment Plant (WWTP) capacity that existed prior to the WWTP expansion. Please contact Planning regarding the second approach.

Figure 1. Solomons WWTP sewer service areas not yet designated as PFA



- Objective 3.2.1.2 states that the county should “Consider allowing developer-funded extension of public water and sewer systems into the Residential Areas around Prince Frederick, Lusby, and Solomons.” The county should be aware that, while PFA designation is not required for privately funded water and sewer extension into these locally designated growth areas, any growth-related state funded projects, such as water and sewer extensions, community development improvements, economic development assistance, and some road improvements, would under most circumstances not be possible in non-PFA eligible areas.

- Objective 3.1.1.1 states “Continue to fund the Purchase and Retirement (PAR) and Leveraging and Retirement (LAR) programs.” Objective 3.3.2.3. states “Evaluate the funding and administration of the Purchase and Retirement Program for development rights.” While these objectives are not in direct contradiction, the county may want to consider consolidating them to avoid confusion about the continuation of funding for these programs.
- Pages 3-13 through 3-22 effectively outline the differences between Major and Minor Town Centers. However, the Land Use Goals and Objectives do not thoroughly describe distinct strategies for promoting the desired land uses in the two designations.
- On page 3-12 the plan notes the county’s preference for new development to locate within Town Centers, although there is greater capacity to absorb new growth outside the Town Centers. According to the build-out capacity analysis (pages 3-11 to 3-12) the proposed Town Centers contain sufficient capacity to accommodate projected household growth with the use of TDRs. The county is encouraged to elaborate on specific infill, redevelopment, and/or suburban retrofit opportunities and strategies for individual Town Centers, perhaps as part of the update process for the Town Center Master Plans (pages 3-16 to 3-22).
- Good design is a key aspect of sustainable development and should contribute positively to the place and experience. Planning believes Calvert 2040 could be strengthened by reinforcing the connections between people and places and the integration of new development into the natural, built, and historic environment.
- Objective 3.4.3.3. states that the county should “Require that rural commercial properties meet the same site design and architectural design standards that are required for businesses that locate within the nearest town centers.” This objective could be more clearly explained, as the determination of town center proximity may not always be as objective as desired, therefore hindering application of appropriate design standards.
- The county may want to consider form-based codes to help achieve Goal 3 Objective 1 on page 3-25, which states “Promote a broad mix of commercial, office, residential, public and quasi-public development within Town Center.” In addition, the county may consider developing design guidelines to guide land development projects in Town Center areas.
 - Calvert may want to develop processes for early engagement in the review of new building and landscape design. Planning is available to assist the county with the development of a design review process, coordinate design review, or assist in the development of standards and guidelines.

Chapter 4 Environment and Natural Resources

- For the *Watershed Management* section (page 4-8), the county should consider including an overarching goal for the condition to be achieved in each of the county’s waterbodies by a certain date. Also, since the *Streams* section covers many of the same issues, consider combining the two sections. The county might also want to clarify which of its watershed management actions are optional and which are currently required by law. Consider listing the waterbodies within Calvert County for

which local Total Maximum Daily Loads exist (the Patuxent River Policy Plan lists two). The section should indicate that the county now has a Phase II MS4 stormwater permit that requires a certain amount of watershed management during each permit cycle, and how the permit helps to implement the county's watershed implementation program (WIP).

- For some of the strategies under Goal 1 (page 4-16), the plan does not appear to make a case for why additional regulations or requirements are needed. As a result, the strategies have less likelihood of being implemented. If possible, the plan should cite an existing study of current regulations and requirements that has identified gaps in the protection of the resource. If such a study hasn't been completed yet, Calvert 2040 could call for such an analysis to be completed to demonstrate the need for the strategies, or a study could be completed prior to the plan being adopted.
- Under Objective 4, "Preserve and protect steep slopes" of Goal 1, the county could consider adding a strategy to develop and implement a workplan by certain dates to ensure selected recommendations of the 2010 Steering Committee Report and the 2014 Advisory Committee Report are realized.
- Under Objective 1 of Goal 3, the county could consider adding a voluntary deadline to the following quantitative goal: "Require replacement of 100% of forest loss since 2010 outside the Critical Area, town centers and villages." The deadline could be based on a county workplan for how to achieve this goal.
- For Goal 4, the county could consider adding language to reflect the need to adjust protection strategies over time due to climate change, such as "Make periodic adjustments to county hazard mitigation strategies based on updated forecasts of how and where hazard impacts might change over time."

Chapter 5 Heritage

- The county should continue to address "strategies for mitigating the effects of water and weather" as mentioned on page 5-4. The City of Annapolis's Weather it Together Cultural Resources Hazard Mitigation Plan is an excellent example of mitigating for weather and water.
- The county should consider how climate changes will affect all the plan's issues in terms of resiliency, including how the county will anticipate and prepare for future changes.

Chapter 6 Housing

- The references on pages 6-4 to 6-6 are particularly helpful for understanding relationships between compact development, housing affordability, and accessibility.
- Planning's recommendation (outlined above) to consider increasing the conventional density of Major Town Centers to 3.5 dwelling units may have the additional benefit of enhancing the supply of affordable housing.

- In *Table 6-1 Total Housing Units in Calvert County, 1990-2016* (page 6-2), the housing unit values shown for the period 2011-2016 do not match what is reported by Planning’s State Data Center. See MSDC numbers in table below:

Table 6-1 Total Housing Units in Calvert County, 1990-2016

Year	Total Housing Units	Change
1990	18,974	
2000	27,576	8,602
2010	33,836	6,260
2011	34,150	314
2012	34,177	27
2013	34,372	195
2014	34,600	228
2015	34,770	170
2016	35,073	303

Source: Maryland Department of Planning, Projections and State Data Center Unit, Census (1990, 2000) and ACS Annual Data (2011 to 2016), DP04.

- *Table 6-2 Units per Residential Structure in Calvert County, 2005-2014* has two issues: First, the 5-year averages presented in that table for 2005-2009 and 2010-2014 are not consistent with data reported by the Census in its American Community Survey (ACS) Demographic Profiles. It is also unclear what the Percent Change column in Table 6-2 is intended to show? Please clarify.
- Planning suggests updating the table to reflect more recent five-year ACS data 2007-2011 and 2012-2016. Below is data from the State Data Center website presented in the same format as used in the Calvert 2040 table.

Table 6-2 Units per Residential Structure in Calvert County, 2007-2016

Structure	2007-2011 5-year Average	2012-2016 5-year Average	Percent Change in Number of Units
Total Units	33,561	34,613	3.1%
1-unit structures (%)	93.1%	92.7%	2.8%
2- or more unit structures (%)	5.5%	6.3%	17.2%
Mobile homes and all other types of units (%)	1.4%	1.0%	-27.3%

Source: Maryland Department of Planning, Projections and State Data Center Unit, ACS Five-year Data, DP04, 2007-2011 and 2012-2016.

- See (page 6-3), section on *Housing Values and Affordability*, paragraph one. The following statements in sentence 1 and sentence 2 are true: “The median value of Calvert County housing has decreased over the past ten years...”, “Calvert County’s

median value has declined from its 2007 peak...” It would, however, be helpful to place the trend in Calvert County median home values in larger context, i.e., in terms of the housing market frenzy, the Great Recession, and Recovery. Data show that both nationally and statewide home prices have fallen since 2007; there is also a consensus among economists and housing market researchers that home prices may have become unreasonably inflated in many parts of the country between 2005 and 2007 and that home prices today (almost 12 years later) might reflect the market correction. Note that between 2005 and 2007, Calvert County median home prices appreciated 21.8 percent.

- The median home values reported on page 6-3, paragraph one, of the plan do not appear to match what is reported by the ACS. Please use the actual figures. For instance, in 2007— according to the one-year ACS— \$425,600; it is \$328,600 in 2012; \$340,700 in 2014 and \$356,400 in 2016.
- The county may want to also consider the following as it addresses sustainable housing:
 - How can this plan’s sustainability approach address housing availability and attainability for individuals at all income levels?
 - Regarding affordable housing, what is the amount of existing affordable housing? Is it being lost, and if so, why?
 - Consider including estimates of future housing demand, as this can help guide growth, infrastructure, and housing types in the plan.
 - Can Objective 6.3.1.5 “Consider adopting inclusionary zoning regulations, after reviewing programs in other jurisdictions ” be expanded and included in the county’s review of its TDR program?
 - The county should explore “[missing middle](#)” housing, which would help to address its stated goals and objectives to encourage mix and affordable housing and build walkable town centers and residential areas (page 6-6 Goal 1). The county may consider revising zoning (if needed) and create design guidelines to support the development of missing middle housing. Here are helpful links on “missing middle”:
<https://www.theolympian.com/news/local/article214629440.htm>;
<https://www.friends.org/latest/missing-middle-housing-what-you-need-know-make-it-happen-your-community> ; and
<https://www.theolympian.com/news/local/article214629440.html>

Chapter 7 Transportation

- The county may want to revise the transportation vision statement to include guiding principles as outlined in the transportation and other chapters. For example, consider including existing text in the last paragraph on page 7-2 to enhance the vision statement as: “Our multimodal transportation system is safe, convenient and economical for all users. Highways are safe and consistent with community’s characteristics while emphasizing on serving town center areas efficiently. Transit is readily available. Walking, bicycling, and other non-motorized transportation are practical alternatives in town center areas.”

- Planning is encouraged by the county's desire to incorporate complete streets policies within Town Centers (Objective 3, page 7-16). We suggest Calvert County coordinate with the State Highway Administration (SHA) and the Maryland Department of Transportation (MDOT) in the development of a complete streets policy. SHA has done extensive work with communities across Maryland to develop roads in local communities that respect the community's character. We encourage the county to review SHA's When Main Street Is a State Highway. More information on SHA's complete streets efforts is available at:
<http://www.sha.maryland.gov/OHD/MainStreet.pdf>
- Planning appreciates the county's "dual goals of preserving the rural landscape and creating vibrant town centers and villages." On page 7-6, it seems that the plan indicates that the county considers the gradual conversion of MD 4 and MD 2/4 into an access-controlled expressway as key to resolving future traffic congestion. This consideration may conflict with the county's goals. It will likely increase the amount of development along the upgraded facility by providing new high-speed and convenient access to largely undeveloped land. It may create multimodal access barriers for planned town centers and villages. Conversion to an expressway or freeway is not necessary to build certain interchanges. Planning suggests the county work with SHA to define an appropriate highway classification for MD 4 and MD 2/4. Staff from SHA, MDOT and Planning is available to assist the county in developing transportation and land use strategies to improve traffic operations along the MD-4/MD-2 corridor.
- Between 2012 and 2016, an average of roughly 62% of the current Calvert County labor force commuted outside the county for employment (Table 8-3, page 8-6). To help reduce the impacts of the jobs and housing imbalance, the county may want to consider increasing the density of its employment development within its Town Centers, which would reduce the need for expansion of business/commercial/industrial lands while encouraging and accommodating employment development. In addition, well-planned and high-density employment land uses would make multimodal transportation access feasible, which would help reduce residents' needs for long distance commuting. The county may also want to investigate financial incentives to attract new businesses.
- Calvert 2040 calls for transit service areas in and between Town Centers (page 7-9). However, planned relatively low-densities in these town centers, especially in minor town centers with a conventional density of one dwelling unit per acre, would present numerous challenges for transit services. We support the county's policies to use TDRs in town center areas to increase densities and to update Town Center Master Plans to encourage transit-supportive land uses and community designs.
- The county may consider including a recommendation under Objective 4 (page 7-13) about updating the Town Center Master Plans to lay out a well-planned roadway network in town centers and provide rights of way and guide future roadway creation and improvements to address local travel needs and support walkable and transit-supportive land uses. Although the current Town Center Master Plans include roadway improvement recommendations, they do not appear to provide well-planned roadway network sketch layouts and proposals.

- The county should consider including “Transportation Demand Management (TDM)” as part of the title on page 12 and include a Transportation Systems Management and TDM element in the County Transportation Plan (re: 7.1.3.2). Encouraging transit, car-/van-pools, telecommuting and flexible work schedules, and transit and pedestrian/bicycle friendly designs are TDM strategies.
- Planning encourages Calvert County to update the County Transportation Plan to include bicycle and pedestrian facilities including transportation and recreational trails addressing pedestrian and bicycle planning related goals and objectives.
 - The transportation plan may consider including vehicular, pedestrian and bicyclist circulation as well as identifying gaps in the existing transportation network.
 - 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. The circulation plan should discuss the rationale for the priority, e.g., supporting planned growth in the PFAs, providing needed connections to address local traffic, etc.
- Information on how the county 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>.
- For Objective 2 – 7.5.2.1, Planning suggests the county include “pedestrian”, and develop both a local bicycle and a pedestrian system plan for each Town Center (page 7-15).
- Planning suggests the county include an objective under Goal I to address emerging transportation technologies and their impacts on transportation planning, e.g., electric vehicles (EVs), connected and autonomous vehicles (CAVs), shared-mobilities (e.g., Uber and Lyft). For instance, the county may want to address electric vehicle infrastructure planning needs. As an example, the City of Fredrick has developed [a EV Charging Infrastructure Implementation Plan](#). The county may also want to explore the need for addressing a policy to encourage “shared Autonomous Electric Vehicles” to maximize CAV’s benefits while reducing CAV’s potential adverse impacts. In addition, the county may want to explore if transportation network companies’ services, such as Uber or Lyft, can be used to enhance demand-response public transportation service.
- The last paragraph on page 7-4, “In each case, there was a significant” duplicates with the first paragraph.

Chapter 8 Economic Vitality

- Calvert 2040 effectively expands the discussion of opportunities for new economic sectors, such as agri-tourism, and the needed energy to ensure long term viability. (page 8-2). The county should continue to expand and promote the development and diversification of agricultural and other land-based rural businesses.

- Please review the column headings for *Table 8-1 Employment Forecasts (Jobs) for Maryland Counties in the Washington Metropolitan Region*. It is unclear what **Number** refers to.

Table 8-1 Employment Forecasts (Jobs) for Maryland Counties in the Washington Metropolitan Region

Employment Forecasts in Thousands from 2015 to 2045									
County	2015	2020	2025	2030	2035	2040	2045	Number	% Change
Montgomery	520.2	543.5	572.5	604.5	627.4	653.9	678.7	158.5	30.5%
Prince George's	338.6	349.0	366.3	375.7	385.5	393.3	402.1	63.6	18.8%
Calvert	34.0	36.8	39.5	40.9	41.9	43.1	44.3	10.3	30.3%
Charles	46.6	47.0	49.2	52.2	55.4	58.8	61.5	14.9	32.0%
St. Mary's	66.0	70.4	74.3	76.5	79.1	81.8	84.5	18.5	28.0%
Frederick	106.2	110.6	115.6	121.3	127.8	133.9	140.2	34.0	32.0%
Total	1,045.5	1,087.0	1,143.2	1,194.6	1,237.9	1,283.0	1,326.8	281.3	26.9%

Source: Metropolitan Washington Council of Governments, Round 9.0 Cooperative Forecasts

- See (page 8-5), *Commuting, Table 8-4 Employment In and Out of Calvert County* (Number of People). First, a more detailed source is needed. Second, please check these numbers as they do not appear to reflect what is reported in ACS Table B08130.
- The county may want to consider providing a more robust analysis of the potential economic impact of retirees (page 8-10). How will the county compete for them and what other locations are competing for them? This link may help: <https://smartasset.com/retirement/where-are-retirees-moving-2017-edition>
- Other Comments:
 - Consider explaining how retirees as a sector may impact other services, such as health care and transportation.
 - Consider linking goals for workforce development and employment to renewable energy, climate change, and resiliency to support the plan's sustainability focus.
 - There is potential for supporting the sustainable growth and expansion of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings.

Chapter 9 Water Resources

- The county's Water and Sewer Plan includes forecasted 2040 demands for each system. The county should assess whether these demands need to be updated based on the proposed land use plan and strategies of the draft comprehensive plan. For example, if more growth will be directed to the Town Centers, then should the county plan for more wastewater demand from the Prince Frederick WWTP? Also, the forecasted 2040 demand for the Chesapeake Beach Inter-Jurisdictional System should be informed by the Municipal Growth Element goals and growth areas established by the Towns of North Beach and Chesapeake Beach.
- The *Managing Stormwater and Non-Point Source Pollution* section should acknowledge that the county now has a Phase II MS4 stormwater permit that requires a certain amount of addition of stormwater management controls during each permit cycle. Recognizing this, the county should modify its strategies under Goal 4 to reflect

its Phase II MS4 permit responsibilities, and to distinguish any additional stormwater management strategies beyond its MS4 permit responsibilities. The *Related County Plans* section and *Water Quality Regulations* section should list the county's Phase II MS4 permit as well and how it relates to the county's 2011 WIP II strategy.

- The county doesn't appear to have evaluated more than one land use plan option (as the state's Water Resources Element guidance indicates) to identify the least impactful land use approach. The state currently suggests that the evaluation assess the differences in future impervious cover and future forest cover that would result from the implementation of each land use plan option.
- The county should discuss the suitability of its receiving waters to meet the stormwater management and wastewater disposal needs of the county. This discussion could capture some of the information from the *Streams and Watershed Management* section of Chapter 4, as well as the results of an evaluation of different land use options.
- Under Goal 4, consider adding deadlines for when the county would like to achieve the various quantitative goals. Also, this section should clarify how the strategies under this section relate to the county's Phase II WIP, Phase II MS4 permit, and/or other watershed plans.

Chapter 10 Community Facilities

- Planning congratulates the county on its demonstrated successes in the areas of bond rating, infrastructure upgrades, financing, education, and regional transit, and believes implementation of Calvert 2040 will continue this trend.
- Planning commends Calvert on its desire to ensure Major Town Centers include passive and active recreational opportunities as well as bicycle and pedestrian connections (page 10-9)
- Planning recommends that the county continue to consult the 2015 Joint Land Use Study (JLUS) completed in collaboration with Naval Air Station Patuxent River (PAX) and Tri-County Council. Calvert 2040 notes the importance of preventing incompatible encroachment with PAX's operations on page 10-16. The county should keep this in mind as it expands the Lusby and Solomons Major Town Centers and explores the extension of privately funded water and sewer infrastructure into the adjacent residential area.
- The dedication the health education and health facility access is laudable. However, Goal 4, Objective 1: "Provide education and necessary services to improve the county's health and wellbeing" does not include a strategy for siting future facilities within Town Centers. The county may want to consider the health and access benefits, especially from a sustainability perspective, of encouraging such siting in existing communities and growth areas.
- Objective 10.6.1.4 recommends reviewing the Storm Water Management Plan every three years. This objective may be better included in Chapter 9 Water Resources.
- Calvert 2040's commitment to waste reduction reinforces the county's new sustainability approach, as reduction is the most effective waste management strategy for ensuring environmental stewardship and fiscal responsibility. Planning

recommends the county consult with the Maryland Department of the Environment during its next review and/or update of its 2006-2018 Ten-Year Solid Waste Management Plan. Additional information and resources on waste reduction are available at <https://mde.maryland.gov/programs/land/recyclingandoperationsprogram/pages/index.aspx>.

- The wording for Goal 6 Objective 5 on page 10-23 is the exact same as the wording for Goal 7. Planning is not sure if that is intended.

Chapter 11 Implementation

- Planning commends Calvert County for taking a proactive approach to growth with the interim actions put in place during the plan's development, including new sign regulations, adoption of the Growth Tier Map, and adoption of the updated Land Preservation, Parks and Recreation Plan. The county may want to also consider the following actions when implementing Calvert 2040:
 - Identify zoning and other regulatory changes that may be necessary to implement the recommendations or policies.
 - Identify, initiate, and expand strategic regional partnerships that could be effective in meeting goals. The Chesapeake Bay Foundation, Maryland Historical Trust, American Farmland Trust, and the USDA Rural Development Loan and Grant Program are all some of the resources that can help work with communities.
 - Link funding sources to action items where possible.
 - Include metrics for evaluating progress in achieving desired outcomes.

END MARYLAND DEPARTMENT OF PLANNING COMMENTS

**Maryland Department of Planning Review Comments February 22, 2019
December 2018 Draft Calvert 2040 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 *December 2018 Draft Calvert 2040 Comprehensive Plan* as part of the standard 60-day review period for 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 2	Maryland Department of Housing and Community Development
Page 3	Maryland Department of Natural Resources
Page 4	Maryland Department of the Environment
Page 5	Maryland Department of Transportation



LARRY HOGAN
Governor

BOYD K. RUTHERFORD
Lt. Governor

KENNETH C. HOLT
Secretary

TONY REED
Deputy Secretary

January 24, 2019

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 Calvert County Comprehensive Plan (the Plan). The comments below are based on a review of the plan by staff in DHCD's Division of Neighborhood Revitalization.

The Plan's recommendations, and our comments here are informed by the following concerns highlighted in the plan (note page numbers from the plan in brackets as a reference):

- Many of the Calvert County's town centers lack a sense of place and are dominated by commercial strip development. [ES-2]
- Nearly 85 percent of Calvert County residential development is categorized as low or very-low density. Most of the residential development has occurred outside the town centers. [ES-2]
- In many areas within the town centers, the housing stock is predominantly single family dwellings on mid-size lots, and the commercial areas are dispersed and vehicle-oriented.
- Concerns raised at Plan public workshops included housing affordability and that most of the County's housing stock is not designed to allow older residents to remain in the home. [6-2]
- Calvert County has only four isolated locations where fiber optic connections are available [8-15], limiting the county's ability to attract high-tech jobs.
- There is limited bicycle and pedestrian infrastructure connecting the town centers. [7-10]

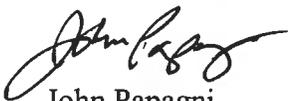


Based on these concerns, we have the following recommendations to strengthen elements to the Plan:

- Development of senior and affordable housing should be prioritized within town centers to address current and future housing needs. DHCD financing programs may be able to support commercial and residential development within town centers.
- The Plan should prioritize infill development in town centers, including mixed use development with ground floor retail and upper story residential, particularly along MD 2/4.
- The County should consider financing through the Local Government Infrastructure Financing Program, and other financing tools to expand fiber optic access.
- The County should consider utilizing programs such as Maryland Bikeways to help financing the planning and construction of bicycle and pedestrian improvements.
- As an anchor institution, the College of Southern Maryland is going to be an important ally in implementing future housing and economic development strategies. The County should consider working with the College to design economic development strategies using programs such as the SEED Community Development Anchor Institution Fund administered by DHCD.
- The use of Transferable Development Rights (TDRs) holds promise to concentrate development in town centers [ES 3-4]. The County should clarify how TDRs will be implemented. In particular, the County should highlight examples where TDRs have been successful as models for Calvert County.

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.

Sincerely,



John Papagni
Program Officer
Division of Neighborhood Revitalization

Cc: Oumy Kande

Calvert County Comp Plan
DNR Comments

Calvert County is to be commended on a thoughtful and responsive comprehensive plan.

Forestry

Maryland Forest Service proposes additions that would strengthen the visions of a well-forested county with a viable rural economy and livable communities.

We appreciate the County's commitment in preserving and restoring forestland, in particular to track and maintain 90% of existing forest as of 2010 and require replacement of 100% of forest loss since 2010 outside the Critical Area and Town Centers in Objectives 4.3.1.1 through 4. We would encourage tracking tree canopy in addition, available through Chesapeake Bay Program mapping, and establishing goals for urban tree canopy as part of creating livable, walkable communities. Recognition programs for tree planting and other sustainability practices can bring visibility to these efforts; programs include Tree City USA (city or county eligible), PLANT Communities (People Loving and Nurturing Trees) and Sustainable Maryland (expanding beyond North Beach and Chesapeake Beach). Increased participation could be among the County goals.

The County commitments to preserve and restore streams and stream corridors in 4.1.3.1 and 2 are an essential part of restoring functional watersheds in the Mid-Atlantic region, and we would encourage moving the implementation time-frame to act more quickly than mid- to long-term. Similarly, greenway systems have broad function in watershed resilience, and protection is needed sooner than long-term, especially since the slowing growth environment noted elsewhere in the plan could change with regional economic fluctuations, and the general growth environment around Washington D.C. area tends to remain stronger than other areas of the country.

Chapter 4 mostly stressed protection of woodlands and did not mention conservation very much. The intent to maintain and protect forest lands from development is commendable, but the public may take that to mean that forests can't be used for timber products or other uses, which limits the normal means of maintaining forest health, sustainable flows of renewable resources, and providing incentives for private and public landowners to maintain land in forest cover. Promoting sustainable management of forest resources is essential to not only maintaining forest health, wildlife habitat, soil erosion control and improving water quality, but also as an economic resource. Loss of

landscape-scale fire, expansion of deer populations, and increase in invasive species now mean that active forest management is needed to maintain most native forest types into the future.

The plan identifies the need to support the agricultural community, critical to keeping a viable rural landscape. We strongly recommend adding opportunities to support forestry and forest products industries as well, building stronger incentives for forest landowners to keep land in forest and not clear for other land uses. In Chapter 3, Objective 2, local processing of forest products could be added to agricultural products; 3.1.2.1 could reference farm and forest product sales and 3.1.3.2 could include locally-grown food and forest products. Chapter 8, Objective 1 could reference agriculture and forestry opportunities, adding foresters to 8.1.1.1 and agribusiness and forestry in 8.1.1.2. Objective 4 on renewable energy could expand beyond solar opportunities to include renewable biomass, sourced from agriculture or forest products. Some new technologies have been developed for low-emission high-efficiency systems, and combined heat and power systems are being used very cost-effectively in neighboring states. Southern Maryland has locally-based logging and small mills that could continue to contribute to meeting local needs and providing important forest markets for landowners.

For Chapter 9, Goal 4 on Stormwater Management, the use of trees and forests should be encouraged within the stormwater projects to the extent practicable for the space and safety limitations. The greatest infiltration rates are usually seen in forests, as the trees develop macroporosity over time and their larger biomass can provide greater organic matter important for development of soil structure and denitrification pathways.

For any additional questions about these comments or forestry, please contact Anne Hairston-Strang, Associate Director, MD Forest Services, Department of Natural Resources, at 410-260-8501 or anne.hairston-strang@maryland.gov

Fishing and Boating Services

There are many features to the County's Comprehensive plan that compliment our recommendations for maintaining productive fisheries, including concentrating development in town centers, focusing planning on watershed boundaries, maintaining the rural character of the county by promoting thriving farms and healthy forests and developing economies that capitalize on the rich historical and natural resource heritage of the county. Comments below support these efforts and offer additional recommendations to assist the county in attaining these goals.

We applaud the County's plan to concentrate development in Town Centers to curb sprawl and maintain the rural character of the County. Our studies indicate that increased development in a watershed is associated with stressors that limit healthy fish habitat. Favorable habitat conditions are maintained in rural watersheds where impervious surface is less than 5% (0-0.27 units per hectare).. In watersheds with 5-10% (0.27-0.83 units per hectare) impervious cover, habitat begins to decline, requiring more aggressive management of fisheries to compensate for habitat losses. Fisheries management options are limited in watersheds when impervious cover is greater than 10% (> 0.83 units per hectare). While there are many restoration programs geared to restore streams and stream habitat, we have no current data to suggest they address these losses enough to restore habitat to support recovery of lost functions essential to supporting healthy fisheries. Therefore, to date the most successful strategy to maintain healthy fisheries is to maintain the rural character (farms and forests) of watersheds.

We also applaud the County's movement toward planning according to watershed boundaries. Given the relationship between increased development in a watershed and declines in ecological function, we recommend the county assess the impervious cover for each watershed and consider the following recommendations when developing watershed management strategies:

Watersheds with impervious cover at 0-5% are associated with productive fisheries habitat. Fisheries managers are able to apply traditional management approaches (catch restrictions and stocking when needed) to maintain healthy fisheries. In these areas, we recommend conserving landscapes and restoring streams to restore and increase habitat connectivity.

Watersheds with impervious cover at 5-10% begin to show declines in habitat function that support healthy fisheries. Management efforts to maintain sustainable fisheries increase to compensate for habitat losses. Increased catch limits and stocking can curb some of these losses but increase the cost of managing fisheries. We recommend conserving remaining rural lands and rehabilitating habitats to limit stressors that limit fish production.

Watersheds with impervious cover greater than 10% are associated with impaired fisheries. Fisheries management options to compensate for habitat losses are limited and in highly developed watersheds there are no viable options to maintain production of key iconic species. In these areas, we recommend conserving remnant rural lands and reengineering habitats to limit pollutant loads to receiving waters.

In addition to evaluating present impervious cover in a watershed, we recommend the County project future impervious cover by watershed at build out. (We have developed an approach to project future impervious cover and would be glad to assist the county if needed.) This will allow assessment of future habitat conditions and can be applied to reinforce the need to concentrate growth away from rural landscapes and limit present sprawl development in these areas. Projections of future impervious can also help the county develop appropriate codes and zoning to achieve the goals set forth in the comprehensive plan which focus on concentrating growth in Town Centers to support more efficient and economical growth.

Reducing 'sprawl' is good for natural resources, particularly for aquatic resources that are heavily impacted by point and nonpoint pollution caused by development throughout the watershed. The County had recognized that making Town Centers "*the*" place to go is an effective strategy to attract businesses and development. This could be accomplished by promoting small farmers markets such as the plan outlined but also by increasing the 'atmosphere' of the Town Center by increasing the "small town" curb appeal. For example, the county could use seasonal decor throughout the year and promote seasonal festivals; allow for street or 'pop up vendors, develop a venue for outdoor performers, promote regional fairs associated with various hobbies and recreational activities, and develop annual events associated with various heritage and cultural attractions of the county. The county could also capitalize on its rich hunting and fishing heritage and develop tourism events associated with fishing towns and hunting hamlets. Festivals and tourism opportunities could be associated with these towns and tied to natural resource-based activities, such as birding or wildlife festivals, hiking adventures (geocaching weekends), or waterfront festivals combined with water-based recreation. Multi-day festivals could draw tourists from greater distances and increase the frequency of extended stays.

The county also acknowledged the need for public transportation to serve residents commuting to work outside of the county and reduce traffic on Rt 2/4, the main collecting artery. We support this along with the desire to minimize construction of additional roads.

We would encourage the county to establish a standard to maintain a 100 foot buffer around wetlands and waterways. Though this is an aggressive measure, experience shows that buffers are often breached because enforcement is limited or too late. Increasing the standard to 100 feet could allow for variances that would be less invasive (perhaps 50'). Where variances are granted, we would recommend minimizing the footprint of development to maintain <5% impervious cover.

Buffers are key in entraining nutrients and sediments. Erosion and siltation is a key problem to aquatic health because sedimentation minimizes habitat and ecological function. Siltation of waterways also changes the way streams and waterways receive rainfall and can contribute to local flooding. A combination of management actions that reduce impervious surface and increase buffer can effectively reduce sedimentation in streams. We recommend enforcing buffer maintenance and minimizing impervious surface either through applying limits or using pervious products that allow for effective infiltration of rainfall. Though costly, efforts to maintain ecological function are much less costly than restoration and mitigation efforts.

Many areas in Calvert County have communities that were built for summertime use initially such as Scientist Cliffs, Chesapeake Beach and the Chesapeake Ranch (Club) Estates. Some of these used a community well for sewage and gray water treatment, but many still use private septic systems. In the Ranch Estates in particular, some of these septic systems are antiquated and can negatively impact the multiple tributaries (intermittent and watered) that run throughout the property. We support the county's focus on reducing and retrofitting antiquated sewage treatment systems. We suggest programs to subsidize installation of updated and practical septic systems on those homes that pose the greatest risk to the watershed. This program could run something like the CREP program where houses that are within a specified distance to a tributary or wash would qualify. There are many areas within the Ranch Estates where deep ravines that are dry most of the year become raging torrents during somewhat heavy rains, and the houses around them still use leeching pits that no longer function as they were intended. Eroding hillsides compromise these pits if they were installed close to the ravine. Efforts to address these problems could improve water quality in local streams by reducing sediment and nutrient inputs.

In order to reduce the amount of runoff from any construction project an additional step during the inspection process could be added after the Environmental Site Design is approved. Most construction projects include acceptable designs for erosion control and site containment. However in practice, often times these plans fail, because they are ineffective for the site conditions, they are not properly installed, or as in most cases, they are not properly maintained. Increased inspection after installation would help tremendously with reducing sedimentation in our waterways and would be a positive step towards being proactive in protecting the Bay. While the comprehensive plan is a guidance document, enforcement of permit requirements is essential to achieve the goals set forth in the plan.

The county recognizes the value of their natural resources and has set appropriate goals to maintain their value. We reinforce preceding recommendations to evaluate

present and project future impervious surface levels by watershed to develop sound management strategies that can conserve and rehabilitate ecological function. We also commend the county for recognizing the need to plan based on natural not jurisdictional boundaries. Shifting planning accordingly will allow the county to assess cumulative impacts in a watershed and develop sound strategies to comprehensively address them. It will also allow the county to direct growth away from areas where ecological functions are more intact.

We affirm the county in recognizing the full array of stressors that can alter stream function and habitat quality and recommending conserving streams in good condition and considering streams in poor condition for remediation. This is consistent with the commonly understood principle that conservation is much more cost effective than restoration. We recommend working with DNR Maryland Biological Stream Survey and Maryland Fisheries Service biologists to develop management priorities for streams in Calvert County.

We affirm the county's adoption of the Patuxent River Commission's Patuxent River Policy Plan which promotes strategies to address stressors to water quality and natural resources in the watershed. We would encourage the County to push all participating jurisdictions to adopt similar growth strategies found in this plan, including clustering growth to town centers, minimizing sprawl, planning based on ecological boundaries and capitalizing on resources in the county to stimulate rural economies. We would also encourage the County to support conservation and restoration strategies in other counties to maintain and possibly even improve water quality and habitat conditions in the Patuxent River. The County has recognized the value of fisheries and indicated concern over declining fisheries in the Patuxent River attendant to habitat loss and management failures. The chief goal of the Commission, to replenish fish and shellfish resources to stimulate local economies, aligns to the county's desire to maintain and enhance fisheries-based activities. Maryland Fishing and Boating Services investigates fisheries habitat conditions and has identified urbanization as a major stressor to fish habitat. Estimates of impervious cover for the Patuxent River are around 10%. We have observed habitat impacts associated with development including reduced oxygen in downstream receiving waters and increased conductivity in upper freshwater areas of the Patuxent River. These stressors have been associated with declines in fish and crab production similar to declines noted in the comprehensive plan (Uphoff et al. 2011; Mistiaen et al. 2003; Uphoff et al. 2017). However, there are still productive habitats in the River that can be conserved through aggressive land conservation approaches, mitigation of water quality stressors and sound harvest management. Because conservation and recovery involve many elements, a cooperative approach between state management agencies and localities through the work of the Patuxent River Commission offers a great opportunity to develop management strategies to achieve the County's goals. We would readily support any such efforts and provide data and guidance on such strategies.

Additionally, we offer assistance in identifying and utilizing more public fishing areas. Presently there are only a few public ponds and beaches where families can fish and recreate. Charles County holds a kids public fishing derby twice a year and it's a great activity where many young people get their first chance to hold a fishing rod. Sponsors provide food and prizes and the county coordinates the rest. Many kids come from a one parent home now and that parent either doesn't have the time or knowledge to teach their kids to fish. Opportunities like this introduce both the parents and kids to fishing and the community at large. Events like this highlight the resources in the county, provide a service to the community and help to foster a lifetime love of the outdoors in young people.

The Maryland Department of Natural Resources stocks put and take trout in two ponds in Calvert County, Calvert Cliffs Pond and Hutchins Pond. If other suitable public ponds are identified, we can consider adding them to the stocking program.

For specifics regarding identifying potential opportunities to increase recreational fishing activities, contact Mary Groves, Maryland Dept. of Natural Resources, Boating and Fishing Administration, Inland Fisheries (301)888-2423, mary.groves@maryland.gov.

Finally, we are pleased to see that the County has recognized hunting and fishing as part of the County's heritage. We would recommend identifying historical sites associated with hunting and fishing and capitalizing on these sites to promote tourism.

References:

Mistiaen, J., I. Strand and D. Lipton. 2003. Effects of Environmental Stress on Blue Crab (*Callinectes sapidus*) Harvests in Chesapeake Bay Tributaries. *Estuaries* (26) 2a:316-322.

Uphoff Jr. James H., Margaret McGinty, Rudolph Lukacovic, James Mowrer & Bruce Pyle (2011): Impervious Surface, Summer Dissolved Oxygen, and Fish Distribution in Chesapeake Bay Subestuaries: Linking Watershed Development, Habitat Conditions, and Fisheries Management, *North American Journal of Fisheries Management*, 31:3, 554-566

Uphoff Jr. James H. and coauthors, 2017. Marine and estuarine finfish ecological and habitat investigations. Performance Report for Federal Aid Grant F-63-R Segment 7, 2016. Maryland Department of Natural Resources, Annapolis, Maryland.

Uphoff Jr. James H. and coauthors, 2018. Marine and estuarine finfish ecological and habitat investigations. Performance Report for Federal Aid Grant F-63-R Segment 8, 2017. DNR 17-012919-121. Maryland Department of Natural Resources, Annapolis, Maryland.

Coastal Resources and Climate Vulnerability

The Plan does a good job of identifying potential hazards including, storm surge and coastal flooding and more. The designation of waterfront communities and limiting future development in these areas is thoughtful and strategic.

The County has good job of incorporating hazard and coastal planning into the goals in Chapter 4 including protecting and preserving natural areas that provide natural flood protection, creating flood management plans for each watershed, emphasizing pre-disaster retrofitting and post-disaster planning, identifying projects and programs to retrofit, relocate, or acquire properties as well as remove structures susceptible to repetitive flooding, discouraging new development in high hazard areas and protecting critical infrastructure from to prevent disruption of service.

DNR also commends the county of the discussion of how coastal storms and flooding may impact historical sites and archeological resources.

Environmental Education:

Calvert County serves as a model for environmental literacy for the State of Maryland. DNR commends the County for including the strategies to support the CHESPAX program as a critical part of protecting the environment and natural resource of the County by engaging future stewards through education.

Maintain, support, and improve the environmental education programs for school-aged children, including the CHESPAX program for the Calvert County Public School System.

For any additional questions about these comments or coastal resource management, please contact Sandi Olek, Chesapeake and Coastal Services, Department of Natural Resources, at 410-260-8979 or sandra.olek@maryland.gov

Re: Local Plan Review: 2018 Draft - Calvert County Comprehensive Plan

Amanda Redmiles -MDE-

Joseph,

Enclosed are MDE's comments for this project.

1. Any 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 Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If 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.
3. Any 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 Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Waste Diversion and Utilization 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.
5. Any 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

1950 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.

6. The 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 contact the Land Restoration Program at (410) 537-3437.

7. Borrow 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.

Thank you,

Amanda R. Redmiles
Interdepartmental Information Liaison | Public Information Act Coordinator
Office of Communications
Maryland Department of the Environment
1800 Washington Blvd – Baltimore MD 21230
410-537-4120 (Direct) **410-537-3936** (Fax)

February 14, 2019

Karen Mierow
Maryland Department of Planning
301 West Preston Street, Suite 1101
Baltimore MD 21201

Dear Karen Mierow:

Thank you for coordinating the State of Maryland's comments on the draft 2018 Calvert County Comprehensive Plan ("the Plan"). The Maryland Department of Transportation (MDOT) offers the following comments on the Plan for consistency with MDOT's goals and objectives:

General Comments

- The plan demonstrates a good understanding of Calvert County's transportation needs and includes appropriate recommended actions to achieve the stated goals and objectives. In particular, MDOT is supportive of the Plan's "Sustainability Approach". As stated in the plan on page 7-3, this approach is a concerted effort to coordinate land use and transportation decisions that will promote alternatives to single-occupant vehicle use, which may result in fewer total automobile trips by encouraging land use that supports walking, bicycling, and public transit.
- MDOT recommends that the Calvert County highlight the alignment of the Plan's goals with the MTP. The Plan's emphasis of improved mobility with better and cleaner transportation choices such as transit, walking, biking, improved accessibility and safety support the goals outlined in the Maryland State Transportation Plan (MTP).
- MDOT recommends that the Plan should reference the alignment of the Plan's goals with the Maryland Bicycle and Pedestrian Master Plan (MD BPMP). Additionally, resources are available from the Maryland Department of Transportation State Highway Administration (MDOT SHA) to assist in the development of bicycle and pedestrian infrastructure within designated areas of the State. Please coordinate with Mr. Sean Varsolona, MDOT SHA Regional Planner, at 410-545-5672, or via email at SVarsolona@sha.state.md.us.

- 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 Town's desire to reduce traffic congestion. The program offers an extensive menu of commuter transportation services, such as ridesharing. Download the Commuter Choice Maryland Brochure for more information. Please visit www.CommuterChoiceMaryland.com for more information.
- When referring to matters related to State-owned streets, roads and highways, the phrase "Maryland Department of Transportation State Highway Administration (MDOT SHA)" should be incorporated into the Plan.
- It is recommended that any proposed projects on State roads be considered for inclusion in future updates to the Calvert County Board of Commissioner's Transportation Priority Letter, which is submitted annually to the Transportation Secretary.

Specific Comments

Chapter 2. Key Issues

- Page 2-2 - MDOT supports the County's efforts to direct new development to the locations that are most desirable from the perspective of County visions. The plan documents two trends in Calvert County on page 2-2 that are affecting traffic patterns and putting more automobiles on roadways in the County. First, an increasing number of County residents travel outside of the County for work, while at the same time a growing number of residents who live outside of the County travel to the county for work. Please visit www.CommuterChoiceMaryland.com for more information about commuter transportation services, such as ridesharing. Ridesharing and other commuter options could help reduce the negative effects of the travel patterns and travel trends that have been identified in the Plan.

Chapter 7. Transportation

- Page 7-1 – Calvert County references how their transportation Chapter relates to the "Maryland State Visions" for Transportation. It is recommended that Calvert County make direct references to the 2040 Maryland Transportation Plan (attached).
- Page 7-2 – Please include the year for the U.S. Census Bureau statistic for the referenced, "60% of residents commuting out of the county for work".

- Pages 7-3 to 7-4 – Traffic Congestion in Calvert County – The MDOT SHA encourages the county’s continued development and implementation of Prince Frederick and Chesapeake Boulevards. These redundancies help to separate regional traffic and local traffic in the MD 2/MD 4 (Solomons Island Road) corridor through Prince Frederick, improving operations for all users.
- Page 7-6 – Highway System, Functional Classification, MD 4 and MD 2/4 – The MDOT SHA notes that it completed MD 2/MD 4 phase 1 widening and reconstruction, between Old Field Lane and Commerce Lane, in 2010. The MDOT SHA is currently constructing phase 2 widening and reconstruction between Commerce Lane and Fox Run Boulevard. Design, right-of-way acquisition, and construction funding for additional phases to cover the remainder of the corridor from north of Stoakley Road/Hospital Road to south of MD 765A (Main Street) (south junction), remains to be identified. MDOT will consider advancing additional phases as resources allow and acknowledges the county’s prioritization of phase 3A-3B widening and reconstruction from north of Stoakley Road/Hospital Road to Fox Run Boulevard as documented in the county’s 2018 transportation priorities letter. Please continue to coordinate with MDOT on the County’s efforts for the gradual conversion of MD 4 and MD 2/4 into a controlled through access expressway to resolve potential future traffic congestion. Please contact Mr. Sean Varsolona, MDOT SHA Regional Planner, at 410-545-5672, or via email at SVarsolona@sha.state.md.us.
- Page 7-10 – Transit, Possible Future Transit – Please continue to work with MDOT MTA regarding your ideas for the creation of new local transit service areas in the town Centers, and for “express bus” service (also known as commuter bus) between those centers. For local transit service planning, please contact with Bruce Hojnacki, MDOT Maryland Transit Administration (MDOT MTA) Regional Planner. Mr. Hojnacki can be reached at 410-767-3758, or via email at BHojnacki@mta.maryland.gov. For commuter bus service planning, please contact Mr. James Authenreath, MDOT MTA Regional Planner. Mr. Authenreath can be reached at 410-856-4823, or via email at JAuthenreath@mta.maryland.gov.
- Page 7-10 – Please coordinate with MDOT TSO on any potential ferry service studies in Calvert County. Please contact Travis Johnston, MDOT MTA Senior Program Manager, Office of Local Transit Support. Mr. Johnston can be reached at 410-767-3433, or via email at TJohnston@mta.maryland.gov.

- Page 7-11 – Residential Area and Town Center Transportation Networks – The MDOT SHA encourages comprehensive local roadway network development, e.g., parallel local routes, grid networks, neighborhood connectors, bicycle/pedestrian infrastructure, etc., to ease stress on arterials and to separate regional and local traffic. With the partial construction of Prince Frederick and Chesapeake Boulevards in Prince Frederick, the county has begun to make positive efforts in this direction. The MDOT SHA encourages continued efforts, especially to redirect local trips off MD 2/MD 4 where possible. (See also objectives 7.2.1.1, 7.2.1.2, 7.2.1.3, and 7.3.2.1, p. 7-14.)
- Page 7-12 – Transportation System Management – The MDOT SHA encourages the county to adopt measures and introduce technology aimed at maximizing the use of existing infrastructure as often, this is less costly and as effective as widening or reconstructing roadways. (See also objectives 7.1.4.1, p. 7-13, and 7.3.1.2, p. 7-14.)
- Page 7-14 – Goals and Objectives, objective 7.3.1.3 – The MDOT SHA acknowledges the county’s prioritization of MD 231 (Hallowing Point Road) intersection improvements, between MD 2/MD 4 and the Patuxent River, as documented in the county’s 2018 transportation priorities. Ongoing MDOT SHA efforts include the design of a MD 231 center left-turn lane between Mason Road and Toye Lane; the design of a westbound MD 231 left-turn lane at MD 508 (Adelina Road); and the design of east and westbound MD 231 left-turn lanes at Skipjack Road/Sixes Road. Please contact Mr. Sean Varsolona, MDOT SHA Regional Planner, at 410-545-5672, or via email at SVarsolona@sha.state.md.us.
- Page 7-15 – Goals and Objectives, objective 7.4.2.1 – The responsible parties designated for the objective to provide adequate commuter parking lots at key locations throughout the County should include MDOT SHA, in addition to the MDOT Maryland Transit Administration. Currently, MDOT SHA maintains five park-and-ride lots in the county. MTA’s Commuter Bus 840/850 stops are at parking lots in Prince Frederick and St. Leonard’s, along the edges of two identified Town Centers in Calvert County. Nearby, but without direct connectivity or shared facilities, are local bus routes. To balance the needs of commuters who work in and outside of the county while reducing demand on existing street networks, the Plan may benefit from stating a more explicit direction to reduce or eliminate the distance between commuter bus and local bus services, and increasing bike and pedestrian access to commuter bus (and local bus) stops for future town center residents who may still end up commuting out of the county. Presumably, the commuter bus stops are located at parking lots under the assumption most riders are driving from outside of town centers to take a bus outside of the county for work. This additional language may bolster the existing draft to make the town centers and transportation amenities within them more safely and efficiently accessible to those connecting to bus by another transportation mode.

Karen Mierow
Page 5

- Page 7-15 – Goals and Objectives, Objective 7.4.2.1 – This objective should be revised to be Objective 7.4.3.1. Please continue to work with MDOT MTA regarding your ideas for increased availability of demand-response public transportation. Please contact with Bruce Hojnacki, MDOT MTA Regional Planner. Mr. Hojnacki can be reached at 410-767-3758, or via email at BHojnacki@mta.maryland.gov.

Thank you again for the opportunity to review the Plan. If you have any questions or concerns, please do not hesitate to contact Mr. Dan Janousek, MDOT OPCP Regional Planner, at 410-865-1098, toll free at 888-713-1414, or via email at djanousek@mdot.state.md.us.

Sincerely,



Heather Murphy
Director
Office of Planning and Capital Programming

cc: Mr. James Authenreath, Regional Planner, MDOT MTA
Mr. Matt Baker, Assistant Chief, Regional and Intermodal Planning Division, MDOT SHA
Mr. Bruce Hojnacki, Regional Planner, MDOT MTA
Ms. Samantha Biddle, Division Chief, Regional and Intermodal Planning Division, MDOT SHA
Mr. Dan Janousek, Regional Planner, The Secretary's Office, MDOT OPCP
Ms. Corren Johnson, District 5 Engineer, MDOT SHA
Mr. Oumy Kande, Planner, Maryland Department of Planning
Mr. David Schlie, Assistant Regional Planner, MDOT SHA
Ms. Kate Sylvester, Deputy Director, Planning and Programming, MDOT MTA
Kimberly Tran, P.E., Acting Deputy District 5 Engineer, MDOT SHA
Mr. Sean Varsolona, Regional Planner, MDOT SHA

Harrod, Felicia R.

From: Harry Wedewer <harry@wedewergroup.com>
Sent: Sunday, February 24, 2019 6:09 PM
To: Plummer-Welker, Jenny L.; Harrod, Felicia R.
Cc: Uunila, Kirsti
Subject: Heritage Committee Comments Comprehensive Plan (December 2018 Draft)
Attachments: CC Heritage Committee 02.24.2019.pdf

Hi Ms. Plummer-Welker and Ms. Harrod:

Please find the attached comments from the Calvert County Heritage Committee regarding the December 2018 draft of the comprehensive plan. Thank you for this opportunity to comment and on behalf of the Heritage Committee, thank you and your colleagues for your diligent work on this plan.

Harry

Harry E. Wedewer
Committee Chairperson



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**CALVERT COUNTY
HERITAGE COMMITTEE**

150 Main Street
Prince Frederick, Maryland 20678
410-535-2348 ♦ 410-414-3092 fax

Chairperson: Harry E. Wedewer

February 24, 2019

Ms. Jenny Plummer-Welker, AICP
Long Range Planner
Calvert County Department of Planning and Zoning
150 Main Street
Prince Frederick, Maryland 20678

Dear Ms. Plummer-Welker:

On behalf of the Calvert County Heritage Committee, it is my pleasure to deliver the committee's comments regarding the December 2018 draft of the Calvert County Comprehensive Plan. We are gratified by the inclusion of a heritage section in the draft plan and are appreciative of the hard work that has gone into it. Accordingly, our comments are intended to make a good document better.

Our specific recommendations include:

p. 5-6 Add Objective 5.1.1.9 stating "Support the goal of permanently preserving a minimum of 40,000 acres of prime farm and forest land as a core asset of Calvert County's heritage. [BOCC, Agricultural Preservation Advisory Board (APAB), P&Z, HC].

Justification: The committee believes that the goals of land and historic preservation are inseparable in Calvert County. As stated in the outset of the heritage section of the draft plan, "The heritage of Calvert County is completely bound to its land and water. Farms and communities developed in coherent relationship to the local resources on which they depended." Further, the plan states, "Heritage cannot be abstracted from its physical setting." Consequently, we think it is critically important in the heritage section to underscore the linkage between the preservation of farm and forest land and the preservation of Calvert County's heritage.

p. i-6 Add HC; Heritage Committee

Justification: conforming administrative change.

p. 5-6 Objective 5.3.1.2. Change "Heritage Committee" to "HC."

Justification: conforming administrative change.

Again, thank you for this opportunity to comment. Please express our appreciation to all of those who have worked very diligently on this draft plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Harry E. Wedewer".

Harry E. Wedewer
Committee Chairperson

Holt, Judy C.

From: Marney, Ronald A.
Sent: Monday, February 25, 2019 2:36 PM
To: Holt, Judy C.
Cc: Charles Spicknall; Patron Briscoe; Stephen A. Oberg; Tom Hance
Subject: APAB Comp Plan Comments
Attachments: APAB - Comp Plan - Comments - Final.pdf

Good Afternoon Judy,

I have attached the APAB's comment regarding the Draft Comprehensive Plan. If you have any questions please contact me.

Sincerely,
Ron

Ronald A. W. Marney, AICP, CFM
Rural Planner III

Calvert County Department of Planning & Zoning
150 Main Street, Prince Frederick, MD 20678
410-535-1600 x 2336 410-414-3092 (fax)
Ronald.Marney@calvertcountymd.gov

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Mr. Greg Kernan, Chair
Calvert County Planning Commission
175 Main Street
Prince Frederick, MD 20678

RE: Request for Comments on Calvert County Comprehensive Plan (December 2018 Draft)

Chairman Kernan,

The Calvert County Agricultural Preservation Advisory Board appreciates the opportunity to submit comments on the draft Comprehensive Plan. As the Comprehensive Plan is a guide to managing growth in the county, the Calvert County Agriculture Land Preservation Programs and the Agricultural Preservation Advisory Board are important parts of that process.

The Calvert County Agricultural Preservation Advisory Board (APAB) is comprised of volunteer citizens appointed by the Calvert County Board of Commissioners. The APAB duties are to develop rules and procedures for Agricultural Preservation Districts and Designated Agricultural Areas, implement and monitor these programs, including applications and requests related to properties enrolled in the preservation program, Transferable Development Rights (TDRs) and the rules and procedures for the operation of the county Purchase and Retirement (PAR) Fund for TDRs.

The very first page of the Comprehensive Plan states the long-held values in this county of preserving the rural landscape and its central part of county planning going back to the first Comprehensive Plan in 1967 and inclusion in every subsequent comprehensive plan. The APAB believes this should continue to be recognized as a core value reflected in the Comprehensive Plan. Likewise, “Promoting sustainable development” and “Preserving the natural, cultural, and historic assets of Calvert County” should remain as part of the Goals and Visions of the Comprehensive Plan. In addition, the APAB recommends adding the following item to the goals: “Maintaining and promoting the economic viability of working farms and agricultural operations.”

While county government policy actions taken over the years have been necessary to slow the pace of development and manage growth, these actions have sometimes had an adverse impact on land values for agricultural property owners. For many farm families the land they own is their most valuable asset and their only form of economic or retirement security. Farmers do not have pensions or 401k plans with employer contributions. Decisions to forego development of their property and attempt to keep it in agriculture is done with financial sacrifice and risk. Programs and

tools such as the agriculture land preservation programs, Transferable Development Rights (TDRs) and the county TDR Purchase and Retirement (PAR) fund are necessary to compensate landowners for devaluation of their property and incentivize them to maintain the rural landscapes and rural character and accomplish the sustainable growth that are stated values and goals of the Comprehensive Plan.

The draft Comprehensive Plan identifies the top concerns of Calvert County residents and the things that they consider most important about the county. These are derived from feedback from citizens through survey and workshops. All indicators cited in the Comprehensive Plan show that rural character and rural natural landscapes are the favorite traits and attractions of the county and preserving these traits are the top priority and concern among residents. The APAB believes the Comprehensive Plan should continue to reflect the priorities and concerns of the residents by maintaining a focus on sustainable growth and the preservation of working agricultural land.

Calvert County created the first land preservation program in Maryland and historically it has been one of the most active and successful agriculture preservation programs in the state and the country. The stated purpose of the Calvert County Agriculture Land Preservation Program is to a.) offer an incentive for preservation of prime agricultural and forestry land, b.) provide reimbursement to the landowner who voluntarily agrees to place agricultural and forestry use covenants on his land, c.) utilize the free market system for financing agricultural and forestry preservation, thus avoiding direct cost to the taxpayers, d.) guide development away from prime agricultural and forestry lands on which viable farming and forestry endeavors are practical, e.) promote and preserve the identity of intact rural agricultural communities where working farms and managed woodlands predominate, f.) minimize potential conflicts between agricultural and non-agricultural land use by providing for a functional separation of the two, g.) the purpose of the PAR Fund shall be to purchase, retire and permanently remove TDRs from the development rights market, thereby protecting additional farm land acres from development.

The TDR program is an important aspect of the county agriculture preservation program. As stated on p. 3-2 of the Comprehensive Plan, Calvert County created the first TDR program in the state in 1978. TDRs allow a land owner to sell the development potential to another party. The sale requires the recording of restrictive covenants in land records permanently subjecting the property to development restrictions. Subject to county regulations, a TDR purchaser can use them to attain higher density on another property. The TDR program goal is to deter development of farms and forest lands to areas targeted for residential and commercial growth. The program helped the county reach an initial goal by 1997 to preserve 20,000 acres and is working toward the subsequent goal of 40,000 acres.

There are multiple references in the Comprehensive Plan regarding the goal of directing growth to town centers and the concern that the current TDR program is “not perceived as successfully directing growth into designated areas and protecting rural areas from increased residential development.” (p. 2-7 of draft comprehensive plan). The APAB supports the goal of directing growth to town centers, but cautions that any changes to the TDR program to promote growth in town centers should not come at the expense of the need for the TDR program to provide economic value and support for farmers and landowners in their efforts to keep their land in agriculture. Reducing the requirements for TDRs for development in town centers must be balanced with other actions to ensure TDRs are not devalued for farmers and landowners as a result.

One mechanism that the APAB strongly believes the county can and should continue to utilize to maintain the value and role of TDRs is the Purchase and Retirement (PAR) fund. As summarized on p. 3-5 of the draft Comprehensive Plan, the PAR fund’s purpose is to purchase and retire development rights from the TDR market. The PAR program helps to reduce build out and supports the county’s efforts toward sustainable and managed growth. It is one of the best mechanisms to assist the County in achieving its stated goal of preserving its natural, cultural and historic assets. Funding for the PAR program has come from the agricultural land transfer tax, the recordation tax, local government funds, and matching funds from the Southern Maryland Agricultural Development Commission (SMADC) and the Tobacco Buyout Fund.

The APAB believes that the Comprehensive Plan should reinforce the role of the PAR fund, the benefits it provides toward the values and goals of the Comprehensive Plan and the need for the Calvert County Board of Commissioners to continue to utilize this tool to manage growth and support agricultural land preservation. Specifically, under Goal 3, Objective 2, the APAB recommends revising 3.3.2.3 to state a definitive objective to continue to fund the PAR program. This funding should include that which previously came from the increase in county recordation taxes in 1999. The APAB also recommends the Comprehensive Plan include an objective to enact a requirement that 1% of the annual county budget be dedicated to funding of the PAR program. Based on current figures, annually investing just 1% of our County budget in land preservation will allow the County to reach the previously established goal of 40,000 preserved acres by 2040.

Again, the APAB appreciates the opportunity to submit comments on the draft Comprehensive Plan and we hope that our views and specific recommendations, and those of others who are interested in agricultural land preservation in Calvert County, will be reflected in the final product.

