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Harford County Executive

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Director of Administration



SHANE P. GRIMM, AICP
Director of Planning & Zoning

December 14, 2022

Ms. Phyllis Grover
City of Aberdeen
60 North Parke Street
Aberdeen, MD 21001

Re: Draft 2022 City of Aberdeen Comprehensive Plan

Dear Ms. Grover,

Thank you for submitting the draft 2022 City of Aberdeen Comprehensive Plan to Harford County Planning and Zoning for our review. Harford County welcomes this opportunity and supports any effort to make our plans concurrent. We do this by seeking how to best align HarfordNEXT, the county comprehensive plan, with the proposed 2022 City of Aberdeen Comprehensive Plan.

Municipal Growth Element

The Municipal Growth Element (MGE) of the Draft 2022 City of Aberdeen Comprehensive Plan identifies thirteen planning areas of which twelve are outside of the existing corporate limits where future annexations may occur. Four of the planning areas (Aldino-Stepney, Gilbert, Long/HEAT, and Grays) include lands outside of the Harford County development envelope. The Aldino-Stepney and Gilbert planning areas are inconsistent with the land use plan of HarfordNEXT. The county raised this same concern in 2010 in a letter regarding the last comprehensive plan. City plans for Long/HEAT planning area are consistent with HarfordNEXT. City plans for an agricultural buffer in the Greys planning area may suggest a better approach for the next county land use plan. The purpose of an MGE is to have a realistic view of future growth and development. In some places this plan targets land outside the county development envelope without a strong analysis of the public facility and environmental impact. It may be more efficient to focus on recent annexations and allow the county policies to build a stronger rural buffer around the municipal boundary.

Aldino-Stepney Planning Area

The Aldino-Stepney Planning area is outside of the county development envelope and planned by the county for agriculture. The zoning in the area is Agriculture and Rural Residential. The Aldino-Stepney Small Area Plan anticipates a mixture of agricultural, low density residential, and neighborhood business. The proposed residential density would range from one dwelling unit per acre to up to 3.5 dwelling units per acre. The present planned density is one dwelling unit per ten acres, so the proposed density 10 to 35 times higher than the county plan.

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THIS DOCUMENT IS AVAILABLE IN ALTERNATIVE FORMAT UPON REQUEST

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The draft plan notes the Swan Creek drainage along the southeastern portion of this planning area features non-tidal wetlands and high-quality forested areas. For this reason, it is worth considering that the county's plan for this area may be a better strategy for Swan Creek water quality. If the area develops as the draft plan envisions, no amount of stormwater management infrastructure can match the benefit of the minimal impervious surfaces associated with agricultural land use, especially with agricultural preservation easements and the required best practices. Some easements are already established in the planning area.

The draft planned land use for the Aldino-Stepney planning works against other excellent features of the draft plan. The potential for annexation and greenfield development could compete with development within the municipal limits. Revitalization from infill, redevelopment, and transit-oriented development (TOD) are such important ways to provide a mix of housing, commercial, and employment with lower public infrastructure and service costs. If this planning area could be removed from the plan or at least have its prioritization lowered the county will continue to invest in agricultural preservation and provide a rural buffer to the development of recently annexed areas in the adjacent Gilbert Planning area.

Gilbert Planning Area

Much of the Gilbert Planning area has been annexed since HarfordNEXT. What remains is either zoned agriculture or rural residential. The county recommended against the annexation and a case can still be made for retaining planned agricultural on the unannexed areas because they are adjacent to areas the county has planned and zoned for agriculture. The same arguments offered above for the Aldino-Stepney Planning area do apply. If this planning area could be confined to the annexed area the county will continue to invest in agricultural preservation and provide a rural buffer to the development of recently annexed areas in the Gilbert Planning area.

Long/HEAT Planning Area

While the Long/HEAT Planning area is outside of the development envelope it also corresponds to a notation on the land use plan for the University Center of Northern Maryland. (UCNM) This is because the Harford County Priority Funding Area includes the University Center. This area is also mostly zoned Light Industrial. The plan intended this area for educating and training a skilled workforce that can adapt to the changing needs of the marketplace. The Aberdeen Plan for Integrated Business District is consistent with HarfordNEXT.

Greys Planning Area

The Greys Planning Area is outside of the development envelope, however the eastern portion of this planning area matches the same UCNM designation of HarfordNEXT, so it is in the county Priority Funding Area. This area, located to the west of Cranberry Run, is zoned Agricultural. The draft Aberdeen plan notes that, "The Grays Planning Area is not being considered for development by the city but is being considered as a rural buffer." This is because of infrastructure issues. There are environmental issues as well. The fact that the county did not comprehensively rezone the area from Agriculture to another district presents an opportunity for Aberdeen and Harford County to discuss if the UCNM designation on the county land use map remains well suited to what is now considered by the city to be a rural buffer.

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Adequate Public Facilities

The county adequate public facilities ordinance is a system of ensuring the development envelope is well served as new development is added. The areas outside of the development envelope are not planned for public facilities but the planned agricultural land use keeps the cost of community services very low. This supports the county's capital budgeting strategy. The county offers the following comments regarding the establishment of planning areas outside of the development envelope:

- The County has not planned to provide water or sewer capacity to serve properties located outside the Harford County Development Envelope.
- Harford County does not have plans to provide reserve water supply or transmission capacity to support the City of Aberdeen growth either inside or outside of their current service area beyond that which is already contracted.
- Planning areas outside of the development envelope concern properties that are not currently in the City of Aberdeen water or sewer service areas. If annexation occurs, the city should request to have their service areas revised in the Water and Sewer Master Plan. Additionally, any relevant descriptions of the planned storage and distribution systems necessary to serve this annexation should be added into the water chapter of the Water and Sewer Master Plan.
- Educational facilities master plans of Harford County Public Schools have not planned to provide educational services for the higher associated population yield in the draft plan's planning areas located outside of the development envelope.

Transportation Planning

The County supports the goals and objectives of the transportation chapter of this plan. The county will certainly continue to ensure that Aberdeen's transportation priorities are included in the annual Harford County Priority Letter to MDOT and coordinate on regional matters through BMC membership. The city's transportation goals and objectives call for a fully integrated multi-modal transportation system. The County fully supports the plan to provide complete streets that are designed and operated to enable safe access and circulation for all users, and off-road paths for non-motorized users. The county bicycle and pedestrian master plan update resulted in data which can support local planning efforts. The plan outlines the intention to go after federal grants to support TOD infrastructure. We reiterate our concern that proposed growth areas outside of the development envelope could weaken important TOD goals.

Green Infrastructure Planning

HarfordNEXT recommended the county develop a green infrastructure plan. Certain concentrations of natural habitat are classified as green infrastructure when they provide wildlife habitat as well as public benefits - including flood protection, erosion control, and removal of pollutants from the air and water. Protecting these features improves resilience to more frequent and intense storms. The Green Infrastructure Network identified in the plan maps green infrastructure as a network of core areas surrounded by hubs and linked by corridors. We have published this data online in the form of an interactive web map. The network covers the entire county and may be used by the City of Aberdeen. We can provide this data in other formats if needed.

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When we examine the green infrastructure network in the Aberdeen area, we observe that there are large expanses of core forests around the perimeter of the existing boundary of Aberdeen. Core wetlands, core aquatic corridors and hubs are also identified. These areas correspond to the future growth areas discussed above. We believe that the proposed intensification of future land use in these areas will have a negative impact on the green infrastructure network. Any change to confine areas of future growth to areas which are not mapped green infrastructure is supported.

Historic and Cultural Resources

The exclusion of a historic and cultural resources element from the draft Comprehensive Plan is a concern. Aberdeen is a city of great historical and cultural significance, from its role as a transportation center and the heart of Harford's canning industry, to the technological advances being made at Aberdeen Proving Ground. HarfordNEXT supports strengthening the foundation of preservation in the County and increasing consistency between the municipal and County programs. Harford County recommends the inclusion of a chapter to address historic preservation within the City of Aberdeen, including the economic benefits of adaptive reuse and heritage tourism, sustainability, financial incentives/assistance for owners of historic properties, and local protections for historic resources. To this end we are happy to help the city through sharing data, models, and guidelines.

Thank you in advance for considering this input. I can be of any further assistance, please contact me at 410-638-3103 ext. 3136.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel Gallihue", with a long horizontal flourish extending to the right.

Joel Gallihue, AICP
Chief of Long Range Planning
Harford County Planning and Zoning
220 South Main Street

Cc: Shane Grimm, AICP Acting Director of Planning
Jenny Jarkowski
Deborah Price