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## Maryland DEPARTMENT OF PLANNING

December 9, 2022

Mark Schlottman, Planning Commission Chairman  
City of Aberdeen  
60 N. Parke Street  
Aberdeen, MD 21001

Dear Mr. Schlottman:

Thank you for the opportunity to comment on the draft City of Aberdeen 2022 Comprehensive Plan (Draft Plan). The Maryland Department of Planning (Planning) believes that good planning is important for efficient and responsible development that adequately addresses resource protection, adequate public facilities, housing, community character, and economic development. Please keep in mind that Planning's attached review comments reflect the agency's thoughts on ways to strengthen the Draft Plan, as well as satisfy the requirements of Maryland's Land Use Article.

The Department forwarded a copy of the Draft Plan to several State agencies for review, including: the Maryland Historical Trust and the Departments of Transportation, Environment, Natural Resources, Commerce, Department of Disabilities, and Housing and Community Development. To date, we have received comments from the Maryland Departments of the Environment, Housing and Community Development, Transportation, Natural Resources, and the Maryland Historical Trust. These comments are included with this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

Planning's close and enduring partnership with the City of Aberdeen is reflected in our comments. From our long-standing support of the city's Transit Oriented Development planning and growth management efforts to newer initiatives in support of economic development, neighborhood revitalization, and to the compatible use planning with Aberdeen Proving Ground, many of Planning staff members are intimately familiar with, and have a deep commitment, to planning and community development in Aberdeen. The department understands the importance of Aberdeen in the larger Maryland planning community and the promise that it holds.

The department hopes that Aberdeen considers the extensive and detailed comments included in this review as a reflection of our desire to support Aberdeen in its stated vision to "guide the city as it equitably and sustainably meets resident's current needs, while providing a platform to continue this growth into the future." Planning commends the city for the forward-looking Draft Plan. As noted throughout our review, many of our suggestions should be considered as potential implementation measures that follow plan adoption, rather than as actions to be completed prior to adoption and incorporated into the document itself. Planning staff is available and eager to assist Aberdeen in any Draft Plan updates and/or implementation actions either before or after plan adoption. Please let the department know if the city would like to meet with us to discuss our comments.

Planning respectfully requests that this letter and accompanying review comments be made part of the city's public hearing record.

Please feel free to contact me at (410) 767-4500 or Brooks Phelps, Regional Planner for Central Maryland, at [brooks.phelps@maryland.gov](mailto:brooks.phelps@maryland.gov)

Sincerely,



Charles W. Boyd, AICP  
Director, Planning Coordination

Enclosures: Comments on the Draft City of Aberdeen 2022 Comprehensive Plan

cc: Patrick McGrady, Mayor – City of Aberdeen

Phyllis Grover, Director of Planning and Community Development, City of Aberdeen

Joseph Griffiths, Manager - Planning, Local Assistance and Training



## Maryland DEPARTMENT OF PLANNING

### **Maryland Department of Planning Review Comments**

**December 9, 2022**

**City of Aberdeen**

**Comprehensive Plan Amendment**

The Maryland Department of Planning (Planning) has reviewed the Draft City of Aberdeen 2022 Comprehensive Plan (Draft Plan) and offers the following comments for your consideration. These comments are offered as suggestions to improve the Draft Plan and better address the statutory requirements of the Land Use Article. Other state agencies, as noted below, have contributed comments. Still others may have comments submitted under separate cover. If comments from other agencies are subsequently received by Planning, they will be forwarded to the town in a timely manner.

#### **Summary of Proposed Draft Plan**

The Draft Plan is an update to the City of Aberdeen 2011 Comprehensive Plan (2011 Plan). The 2011 Plan stated the following:

“The purpose of a comprehensive plan is to give direction to both public and private decisions so that the City can realize the most beneficial arrangement of land uses, as well as the orderly and economic delivery of public services for present and future residents.” (page 1-2)

The Draft Plan indicates the following purpose of the update:

“As with the previous Comprehensive Plans, Plan Aberdeen represents the Vision for the City of Aberdeen and provides direction to public and private stakeholders and representatives to help guide the City as it equitably and sustainably meets resident’s current needs, while providing a platform to continue this growth into the future. This Plan represents a coordinated effort to serve as the basis for decision-making for the City, representing the social, economic, and environmental realities of today, while promoting balanced services, initiatives and infrastructure required for the future.” (page 1-9)

The above statements provide an explanation to the community that the purpose of the Draft Plan has not changed dramatically since the 2011 Plan was adopted. The purpose statement(s) could further expand on its thematic idea for the community, as well as new policies or goals, but the Draft Plan includes an Implementation Section that sets forth all the proposed goals and strategies for the future.

The plan does not specifically mention a “horizon year” and only mentions that the plan addresses issues for the next 10-20 years. This has caused some confusion in the review of the plan, for example further into the Draft Plan a different time frame associated with household projections is referenced. The text on Page 5-81 above Table 5-16 estimates an additional 709 households by 2030 and then Table 5-17 shows projections out to 2040 and Tables 5-22 and 5-24 project out to 2028. It would be helpful to see consistent projections out to a specific “horizon year”, as it is difficult to evaluate if there is enough capacity or

facilities without knowing the extent of the planning time frame. This concept is repeated below with specific suggestions for time frame clarity and alignment.

**Minimum State Law Requirements for Municipalities**

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

<b>Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans in Maryland</b>			
<b>State Comprehensive Plan Requirements</b>	<b>MD Code Reference</b>	<b>Additional MD Code Reference</b>	<b>Draft Plan page references</b>
(1) A comprehensive plan for a non-charter county or municipality <b>MUST</b> include:	<a href="#">L.U. § 3-102(a)</a>		
(a) a community facilities element	<a href="#">L.U. § 3-102(a)(1)(i)</a>	<a href="#">L.U. § 3-108 -- Community facilities element.</a>	Section 3-1 Page 37
(b) an area of critical state concern element	<a href="#">L.U. § 3-102(a)(1)(ii)</a>	<a href="#">L.U. § 3-109 -- Areas of critical State concern element</a>	Not discussed
(c) a goals and objectives element	<a href="#">L.U. § 3-102(a)(1)(iii)</a>	<a href="#">L.U. § 3-110 -- Goals and objectives element</a>	Goals outlined at beginning of each chapter
(d) a housing element	<a href="#">L.U. § 3-102(a)(1)(iv)</a>	<a href="#">L.U. § 3-114 -- Housing element SB-687(2021)</a>	Section 6-1 Page 153
(d) a land use element	<a href="#">L.U. § 3-102(a)(1)(v)</a>	<a href="#">L.U. § 3-111 -- Land use element</a>	Section 4-1 Page 57
(e) a development regulations element	<a href="#">L.U. § 3-102(a)(1)(vi)</a>	<a href="#">L.U. § 3-103 -- Development regulations element</a>	Section 8-1 Page 204
(f) a sensitive areas element	<a href="#">L.U. § 3-102(a)(1)(vii)</a>	<a href="#">L.U. § 3-104 -- Sensitive areas element</a>	Section 9-1 Page 243
(g) a transportation element	<a href="#">L.U. § 3-102(a)(1)(viii)</a>	<a href="#">L.U. § 3-105 -- Transportation element</a>	Section 7-1 Page 173
(h) a water resources element	<a href="#">L.U. § 3-102(a)(1)(ix)</a>	<a href="#">L.U. § 3-106 -- Water resources element</a>	Section 10-1 Page 270
(i) a mineral resources element, IF current geological information is available	<a href="#">L.U. § 3-102(a)(2)</a>	<a href="#">L.U. § 3-107 -- Mineral resources element</a>	N/A
(j) for municipalities only, a municipal growth element	<a href="#">L.U. § 3-102(a)(3)</a>	<a href="#">L.U. § 3-112 -- Municipal growth element</a>	Section 5-1 Page 75
(k) for counties only if located on tidal waters, a fisheries element	<a href="#">L.U. § 3-102(a)(4)</a>	<a href="#">L.U. § 3-113 -- Fisheries element</a>	N/A
Optional:	<a href="#">L.U. § 3-102(b)</a>	<a href="#">L.U. § 3-102(b)(2)(i)</a>	N/A

<b>Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans in Maryland</b>			
<b>State Comprehensive Plan Requirements</b>	<b>MD Code Reference</b>	<b>Additional MD Code Reference</b>	<b>Draft Plan page references</b>
(2) A comprehensive plan for a non-charter county or municipality <b>MAY</b> include: (a) a community renewal element; (b) a conservation element; (c) a flood control element; (d) a natural resources element; (e) a pollution control element; (f) information concerning the general location and extent of public utilities; and (f) a priority preservation area (PPA) element			
(3) Visions -- A local jurisdiction <b>SHALL</b> through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	<a href="#">L.U. § 3-201(c)</a>	<a href="#">L.U. § 1-201 -- The 12 Planning Visions</a>	Section 1-3 Page 19
Optional: (4) Growth Tiers -- If the local jurisdiction has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the jurisdiction's comprehensive plan	<a href="#">L.U. § 1-509</a>		Section 5-13 Page 85

As shown in the above checklist, not all required elements are included in the Draft Plan. Planning suggests that Aberdeen consider if and how all LUA requirements are addressed in the Draft Plan as it continues the review process. See the discussion below related to the required elements of a comprehensive plan under the subheading Conformance to Section 3-201(a) of the Land Use Article for suggestions.

In addition to the requirements of § 3–201(a) and (b) of this article, a planning commission must also implement the Maryland State Visions through the comprehensive plan, as discussed in the subheading Maryland State Visions Section 3-201(c) of the LUA immediately below.

**Maryland State Visions Section 3-201(c) of the Land Use Article:**

Maryland’s Planning Act of 1992, and subsequent legislation in 2000 and 2009, requires that the Twelve Visions (12 Visions) of the State of Maryland be included and implemented through the comprehensive plan. Those visions are found in the Maryland Economic Growth, Resource Protection, and Planning Policy, part of the State Finance and Procurement Article, Subtitle 5-7A. Maryland law requires all comprehensive plans be consistent with the 12 Visions.

The Introduction (Chapter 1) recognizes the 12 Visions on page 19 and lists them while stating that the 12 Visions are incorporated throughout the Draft Plan. However, Planning found no direct reference to the visions in the chapters. While several visions such as Housing and Transportation received a full chapter, and others such as Infrastructure are covered within the Municipal Growth element, many of the visions receive very little attention. Public Participation, Community Design, and Stewardship, should be included in the plan, and the Implementation Section should specifically reference how to deliver on the 12 Visions.

### **General Comments:**

The Draft Plan identifies many of Aberdeen’s amenities and why it remains a desirable place to live and work while acknowledging challenges faced by current residents. It describes the need for infill development and for the creation of a new multimodal transportation plan to revitalize the Main Street area, and to create a friendlier business environment to allow for additional retail options throughout the city. It looks to improve housing for current residents and describes the city’s planned updates to its municipal buildings.

However, the Draft Plan is lacking in specific action items, progress measures, and outcomes that could be used to determine its success. The Draft Plan may be enhanced by the consideration of different growth scenarios. The Water Resources and Municipal Growth chapters begin by discussing how the city could grow, but ultimately do not explain Aberdeen’s land use and infrastructure needs in a lower or higher growth scenario than the level it is projecting. Growth scenarios alternatives could account for a steady population, moderate growth, and a more extreme growth scenario for municipal facilities and land use. The Draft Plan provides a good overview of existing facilities, needs, and available area but does not consider building lifespan or build-out capacity throughout Aberdeen.

In general, the goals listed throughout the Draft Plan avoid specific steps, and instead are written in an open-ended way that does not prescribe fixes for the issues presented. Instead, the goals often include monitoring areas, developing new programs, or evaluating processes, but are not directed at specific issues or implementation. An adjustment to include specific and measurable actions will assist the city when addressing the LUA Section 1-207(c)(6), 5-Year Mid Cycle Report requirement to evaluate the effectiveness of plan implementation actions. The need for a 5-Year Mid Cycle Report is identified on page 1-4 of the Draft Plan. For example, critical issues including resolving unwanted uses in the zoning code, and the provision of additional green space and parks, is neither discussed, nor addressed in any of the Draft Plan implementation actions.

Planning believes that the Draft Plan’s housing element inadequately addresses LUA Section 3-114 requirements for affordable housing, added with 2019’s HB 1045, instead opting to discuss “attainable housing”, which is not subsidized, and only includes households making 80% of the AMI and above. The Housing Element also does not address or include the requirements for fair housing, added with 2021’s HB 90, and which will be effective January 1, 2023. Planning recommends that the Housing Element be revised to address the requirements for affordable housing, a topic identified in Appendix C – Public Involvement, as a critical community issue.

To further the strong relationship between APG and Aberdeen, Planning recommends continuing to cite and include installation representatives as an advisory stakeholder as the city tackles infrastructure, housing, and transportation challenges. Strategies for continued collaboration could include:

- Potential briefings of any changes within the city that might impact the installation, including comprehensive plans, transportation plans, zoning and development projects, and capital improvement plans.
- Formalization of a development review coordination process that includes both entities when there are changes in land use or comprehensive planning that may pose operational impacts on APG or cause challenges for the city.
- Coordination with installation representatives on the creation of buffers, notification areas, etc. that identify areas where compatibility issues (noise, safety, height obstructions) are more like to occur within the city and address ways to avoid these issues.

- APG has existing compatibility tools such as the APG Master Plan and Operational Noise Management Plan to facilitate the development of these features.

Planning also recommends that the city consider reorganizing the information and references to APG throughout the Draft Plan into a dedicated military element, or potentially developing a military compatibility functional plan as an implementation of the Draft Plan. Examples of this can be found in [SA Tomorrow](#), San Antonio's Comprehensive Plan, and the [City of Virginia Beach's Comprehensive Plan](#).

- Organizing information in this manner allowed each city to clearly outline the respective installation's economic impact to the community, recognize land and compatible use challenges, and identify goals and policies to be considered at the local level to strengthen the relationship between the two entities.
- Planning notes that a military element is not a requirement of a comprehensive plan in Maryland but is offered as a suggestion to tie together Aberdeen's planning efforts and APG's planning studies.

### **Conformance to Section 3-201(a) of the Land Use Article**

The following is an analysis of the submitted Draft Plan regarding the required elements, as stated in the Land Use Article for a local jurisdiction in accordance with Section 3-201(a):

**The planning commission for a local jurisdiction shall include in the comprehensive plan the following elements:**

**(i) a community facilities element;**

The community facilities element is addressed in Section 3-1 of the Draft Plan. Below is a brief synopsis of the community facilities discussed, along with Planning's comments:

**Governance and Administration:** The Draft Plan addresses the need to upgrade the HVAC system at City Hall and the need for additional office space as the city's administrative division grows.

**Public Safety, Fire and Emergency Services:** The Draft Plan recognizes that Aberdeen has enough police officers, but that the police station within the town center will need to be refurbished as the department has outgrown it. Planning recommends including a recommendation to complete a study of this as part of the community facilities element. The Draft Plan also indicates that in the future, volunteer fire and EMS responders may not be enough to meet the needs of the city over the next 10-20 years.

**Water, Sewerage, and Stormwater:** These are covered in Chapter 10, Water Resources.

**Libraries, Activity Centers:** The Draft Plan summarizes Aberdeen's library, Boys and Girls Club, Swim Center, and Activity Center, along with programming for each. While scheduled repairs and known maintenance is listed for each building and facility, Planning recommends including the condition of each building as well as approximate timelines for replacement or major refurbishment, which will help to inform long-term CIP spending plans.

**Schools:** The Draft Plan lists Aberdeen's high school, middle schools, and elementary schools along with the secondary facilities, outdoor areas, and programs at each. The overall enrollment is projected to grow over the next 6 years but remain well below the state rated capacity. Planning suggests including a longer-term projection to better align with the Draft Plan horizon, information on the remaining lifetime of each

school building, and enrollment benchmarks that would trigger discussions of additional school construction, either within the Draft Plan or as a follow up document that could guide implementation of this section of the Draft Plan.

**Parks and Recreation, Open Space:** The Draft Plan includes a summary of existing parks and open space within Aberdeen’s municipal borders and states that the city should continue to identify additional land that could be acquired or preserved for new parks or open space. Many of the places that are far from parks appear to be sparsely populated, but this section should consider areas targeted for new growth. Planning notes that the years on page 2-2’s timeline appear incorrect.

Planning recommends that the plan include a future development capacity analysis to determine which parks are under or overused, as well as a spatial analysis to determine possible areas that may have a lack of outdoor green space; the parks section does not include any deficiencies or problems. The Draft Plan describes cooperation with the Harford County Parks and Recreation Department but could also include references to regional park facilities such as the nearby Susquehanna State Park and how well they serve Aberdeen residents.

**Health Services:** Aberdeen currently has two urgent care facilities and is anticipating that the University of Maryland Upper Chesapeake Medical Campus will develop a new Aberdeen campus with a full medical facility and 24/7 emergency department, among other departments, which will be a major expansion of capacity.

**(ii) an area of critical State concern element;**

Planning encourages the city to consider referencing the current “Areas of Critical State Concern” list as discussed within the A Better Maryland plan. Here is a link to the website:

<https://abetter.maryland.gov/plan/pages/areas-of-critical-state-concern.aspx>.

A Better Maryland includes a list of state plans and programs that the city may want to identify as opportunities for collaboration between Maryland and its jurisdictions.

**(iii) a goals and objectives element;**

A goals and objectives element is not included on its own or at the start of the Draft Plan, instead being incorporated into individual elements throughout and summarized in Chapter 11 (Implementation) and will be discussed individually throughout this review. Planning recommends that the Introduction chapter be revised to include specific overall policies for the City of Aberdeen that would also serve to clarify how the 12 visions will be enacted as a part of the Draft Plan’s implementation. Additionally, the City should consider revising action steps, as to be measurable, in conformance with the LUA Section 1-207(c)(6) 5-Year Mid Cycle Report requirements for evaluating the effectiveness of plan implementation actions.

**(iv) a housing element;**

The passage of HB 1045 in 2019 has resulted in the requirement of a housing element in all comprehensive plans adopted after June 1, 2020. This law requires a comprehensive plan to address the need for low-income and workforce housing, using the definitions contained in §3–114 of the LUA and §4–1801 of the Housing and Community Development Article. Planning recommends that the city evaluate the Draft Plan for conformance to the requirements of HB-1045, specifically to address the need



for low-income housing. Workforce housing is addressed in the goals section on page 6-2 and with a full paragraph on page 6-13, but it is missing specific needs.

The “Attainable Housing” section of the housing element does not address low-income housing, which is defined in the bill as a household making less than 60% of the AMI. The Draft Plan use of the term Attainable Housing is defined as “nonsubsidized, for-sale housing that is affordable to households with incomes between 80-120% of the AMI.” Planning has developed our Housing Element Models & Guidelines to address the recent legislation (HB 1045), which is contained within the [Maryland Department of Planning website](#) as a tool for local jurisdictions.

In addition, a needs assessment for Aberdeen should be added to the Draft Plan that connects the needs for specific housing types to the growth analysis. The housing element indicates that a significant portion of renters and homeowners in Aberdeen are spending more than 30% of their income toward housing, and that home values have outpaced income, which indicates a growing need for new housing in the community. In addition, different levels of growth, such as the Ultimate Growth Scenario listed in the water resources element should be considered with respect to the need for more affordable and different housing typologies within the housing element.

The city should also be aware of the recent passage of [HB 90](#) (2021) relating to State and Local Housing programs – Affirmatively Furthering Fair Housing. The intent of the bill is as stated in the preamble of the bill. Section 3-114 of the Land Use Article is amended in the bill (effective January 1, 2023) to include the following:

- (d) (1) Local jurisdictions have a duty to affirmatively further fair housing through their housing and urban development programs.
- (2) The housing element of a comprehensive plan that is enacted or amended on or after January 1, 2023, shall include an assessment of fair housing, to ensure that the local jurisdiction is affirmatively furthering fair housing.
- (3) On request of a local jurisdiction, the Department of Planning shall provide technical assistance for the purpose of developing the housing element of the comprehensive plan.
- (4) This subsection does not require a local jurisdiction to take, or prohibit a local jurisdiction from taking, a specific action to affirmatively further fair housing.

Planning is collaborating with state agency partners to develop guidance and resources for jurisdictions to address HB 90 new housing element requirements. The Draft Plan should include descriptions of Maryland requirements for fair housing requirements.

Finally, as noted in the Workforce Housing section (page 6-13), Aberdeen experiences workforce housing challenges and APG employees “often live remotely and commute to APG versus living in Aberdeen or the immediate area.” Trends like this, particularly in defense communities surrounding military installations, are not unique. Planning encourages Aberdeen to consult with APG on current and anticipated needs pertaining to off base housing as the city works to accomplish its housing goals, such as the following strategies:

- To expand on this goal, Planning recommends that Aberdeen work with APG officials and area developers to identify strategies to meet the housing needs of service members, their families, and the civilian workforce when updating the comprehensive plan and other housing studies.
- Aberdeen is also encouraged as it “shares information with local businesses about the types of housing available in the City” (page 6-2) to also share this information with the [Garrison Housing Office](#).

Housing Goal 1, bullet one, page 6-1. How will diversity of housing opportunities be monitored in the R-1 and R-2 zoning districts, as they appear to limit diversity of housing? Also, the city should consider a strategy to ensure the availability of water and sewer to these areas if there is a concern with water and sewer capacity.

Housing Goal 4 - How will these two objectives be implemented? Is diversity in housing types encouraged in all zoning districts? Who will implement and fund the first-time homebuyers program?

Housing Goal 5, bullet one. The Draft Plan should consider identifying the workforce housing needs over the plan horizon. The [Maryland Department of Labor](#) develops and publishes occupational projections by county that may inform the type and cost of workforce housing that the city may want to plan for to ensure workforce affordability and economic development.

**(v) a land use element;**

There are six overall land use goals included in the Draft Plan (page 4-1). The land use element is largely carried over from the 2011 Plan, including the existing zoning code and definitions, which are unchanged except for the addition of the new Transit Oriented Development (TOD) zoning district. Several of the goals from the 2011 Plan have been achieved, including the development of the 2012 Aberdeen TOD Master Plan and adoption of the new zoning district. However, the TOD Master Plan has now been enacted for more than 10 years without new construction on parcels identified around the Aberdeen Amtrak/MARC station, and the specific zoning could be revisited to evaluate any changes that could help to incentivize its use and progress. Such incentives may include the relaxing of the stringent form-based code regulations, increasing density, providing a bonus for affordable housing, etc. The 2012 Aberdeen TOD Master Plan could also be incorporated directly into the Draft Plan in the land use, growth analysis, and transportation sections.

Planning staff suggests that the city consider incorporating different build out scenarios into the land use element. Using projections and analysis is listed as a goal, but discussion of capacity is limited within this section. Another stated goal is to ensure sufficient commercial and industrial/light manufacturing uses, but the total capacity is not discussed. Table 4-1 includes a summary of undeveloped land but does not provide context for how much development could take place on this land or how much is expected to be used if Aberdeen's population continues to grow as projected. The inclusion of a map of undeveloped land would also be useful when discussing existing capacity.

Land Use Goal 1, bullet one, appears to conflict with page 1-2 (last paragraph). The former states that the city should review the zoning map for any needed changes or rezonings as an implementation measure of the Draft Plan, while the latter states that this review will be included in the Draft Plan itself as an analysis to support plan visions and goals.

Land Use Goal 1, bullet two. What areas are being considered for comprehensive rezoning? The analysis does not describe where issues/amendment areas are, or what issues will be resolved.

Land Use Goal 2 indicates that the city will establish a grant program for revitalization. Does the city intend to create its own funding program, such as Tax Increment Financing (TIF), or does the city intend to continue to utilize the rehabilitation funds available through Community Legacy and other state revitalization funding programs?

Land Use Goal 3. What is the need to rezone parcels within the TOD? Is it to evaluate height, density, or use? Are there specific issues to be resolved? There is no discussion about any potential issues.

Land Use Goal 4. What measure will the city use to determine sufficient commercial/industrial land uses? There is no discussion about the needs, lack of designated areas, or future needs based on population analysis.

Land Use Goal 5. Are there any incompatible land uses currently impacting residential areas?

Land Use Goal 6. What are the issues that the form-based code would resolve in the Integrated Business District (IBD) area?

**Land Use Mapping** - The following comments relate to mapping within this chapter:

- Page 4-3 “Land Use Categories” appears to be describing zoning districts shown in Table 4-2 instead of the land use categories shown in Table 4-1 and Map 4-1, then has different land use categories from both Table 4-1 and 4-2.

Maps 4-1 shows some land use categories outside the city boundary.



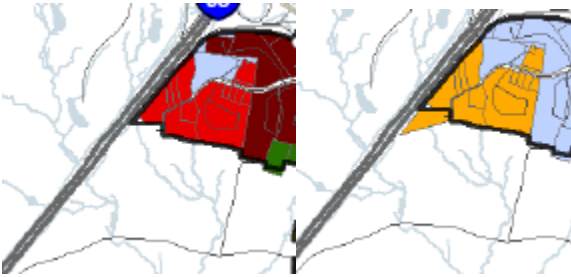
Map 4-2 shows zoning outside the boundary as well.



Map 4-1 shows purple extending beyond the municipal boundary

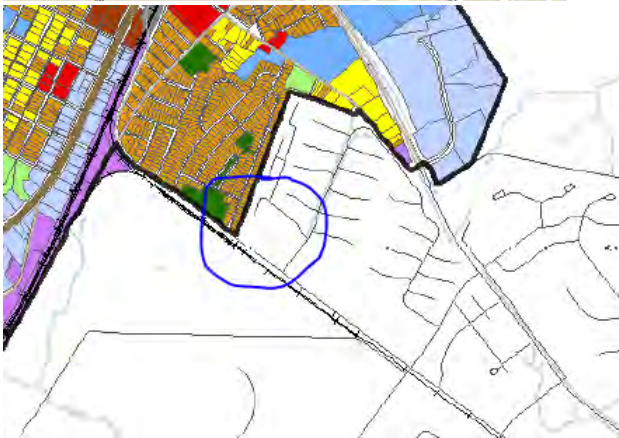
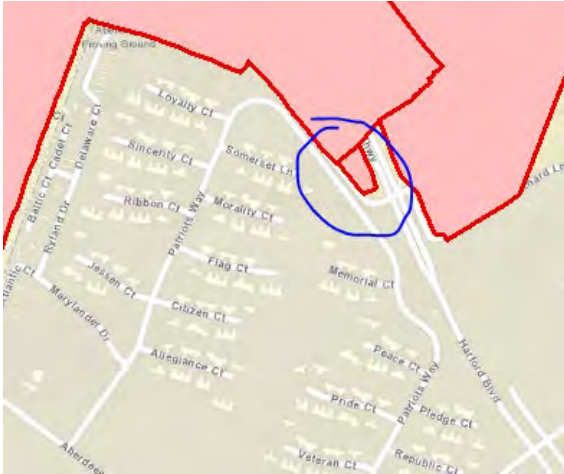


Map 4-1 vs Map 4-2 – note the orange area extending outside the boundary



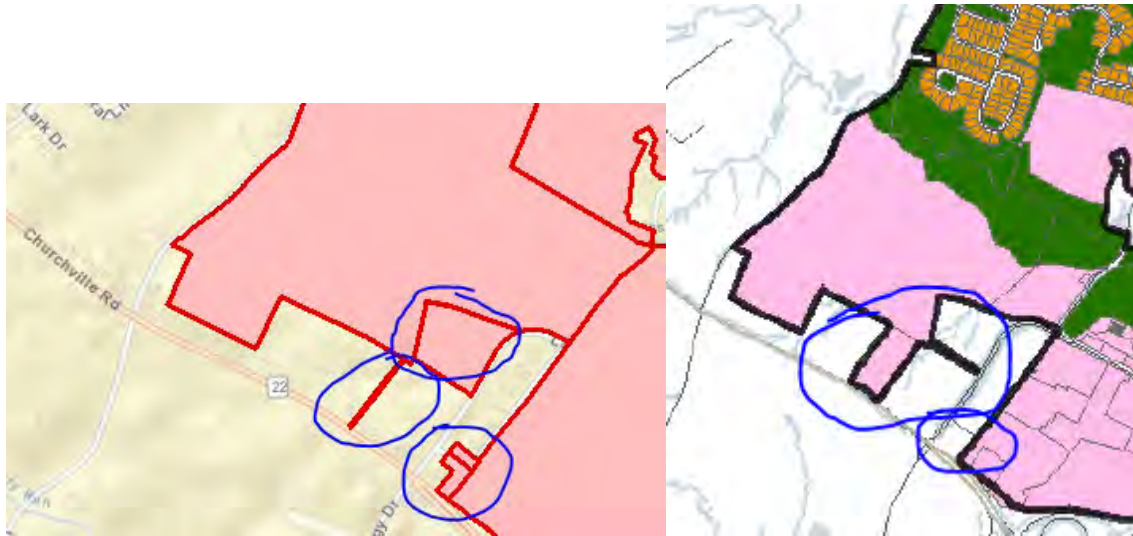
- Planning's municipal boundary GIS layer differs from what is shown in the report, especially in northeast section.

- Annexation Resolution #16-R-03 from 8/5/2017 (not listed in Table 4-3)



- Annexation Resolution #22-R-07 is listed in Table 4-3 but is not shown in the maps. It is shown on Aberdeen's online zoning /land use mapper

- Please confirm if the 2 parcels at 925 Gilbert Road, Resolution 08-3 should be included in the boundary.



On page 4-3, Land Use Categories/Residential, the Draft Plan calls for ensuring an adequate supply of workforce housing. However, an estimate of need is not provided. The Low, Medium, and High-Density land use categories are an unknown amount of acres, since Table 4-1 – Current Land Use Composition, page 4-6, groups all three residential land uses, into one residential category, for a combined acreage of 1,389.8 acres. However, Table 4-2, Existing Zoning Composition, totals the three residential zoning districts at 1,893.4 acres and distinguishes between density categories. Nearly 44% of the city is zoned R-1; however, no strategies are discussed for promoting workforce housing within these areas of the city. On page 4-11, the description of minimum residential lot sizes for the Low, Medium, and High districts, appears to only support greater density within the R-3 District, which is only 11.9% of all zoned lands, and 24% of all residential parcels. The TOD Districts, which occupy approximately 1% of the city’s zoned lands, provide an opportunity for workforce housing. The IBD District also allows for residential use. The city should consider how to utilize the TOD and IBD Districts to accommodate future workforce housing, as they may offer the best opportunities for future residential growth within the city.

**(vi) a development regulations element;**

This element is described in Section 3-103 of the LUA as the following:

- (a) In general. -- The development regulations element shall include the planning commission's recommendation for land development regulations to implement the plan.
- (b) Purpose. -- The development regulations element shall encourage:
  - (1) the use of flexible development regulations to promote innovative and cost-saving site design and protect the environment; and
  - (2) within the areas designated for growth in the plan:
    - (i) economic development through the use of innovative techniques; and
    - (ii) streamlined review of applications for development, including permit review and subdivision plat review.

Planning suggests that the city highlight any changes to the development regulations it foresees will provide for flexibility, any innovations that might improve efficiency in the review process and improve streamlining of applications and reduce costs to the development community to encourage reinvestment into the community.

**(vii) a sensitive areas element;**

No issues identified, but Planning suggests the city note the comments in the attached Department of Natural Resources Department of Environment memos.

**(viii) a transportation element;**

Planning is pleased to see the City of Aberdeen supports multimodal transportation and transit-oriented development (TOD) in the Aberdeen MARC and Amtrak station and US 40 corridor areas. Planning recognizes that the Draft Plan includes transportation goals and strategies that call for maintaining existing transportation infrastructure, implementing complete streets, supporting public transit, improving pedestrian, bicycle, and other non-motorized mode connectivity between residential, commercial, and other activity nodes. The Draft Plan also considers electric vehicle (EV) charging infrastructure, future connected and autonomous vehicles, and the impacts of climate change and telework/telecommuting.

To support the goal of providing additional multimodal connectivity (page 7-1), Planning suggests the Draft Plan include a transit strategy to guide collaboration with MDOT MTA and Harford County to provide transit services to the city, APG, and nearby areas. In fact, the Draft Plan includes a transit strategy and other additional transportation strategies on pages 7-30 and 7-31. The city should consider incorporating this transit strategy and other additional strategies in the set of goals and strategies on pages 7-1 and 7-2, which will enhance their consideration for implementation.

In addition to the fixed route bus services, Harford County provides the demand response/ADA paratransit service to all county areas including Aberdeen. The paratransit service information should be included on page 7-17 under “Bus Transit Services.” The transit strategy should also address the need for paratransit service.

Planning suggests the first strategy under Transportation Goal 2 (Identify Opportunities to provide additional multimodal connectivity) on page 7-1 be modified to specifically call for developing a transportation master plan that will address roadway and transit systems in addition to the pedestrian, bicycle, and non-motorized modes of transportation mentioned in the current strategy statement. “Multimodal Connectivity” on page 7-26 discusses how a transportation master plan should be developed to address all transportation systems in the city. Planning suggests clarifying how this new Master Plan will differentiate from and complement the TOD Master Plan. The city may also want to adopt a complete streets policy to guide roadway improvements and enhance multimodal characteristics of the roadway network.

The Draft Plan should also address any obstacles in implementing Aberdeen’s 2012 TOD Master Plan, as it is approaching a decade since it was adopted, including any issues with adjusting the width of Route 40 or obtaining funds for pedestrian infrastructure surrounding the train station. A revised TOD Master Plan could be incorporated within the Draft Plan to better inform future transportation planning efforts.

Overall, the transportation element does not address the spatial gap between different parts of Aberdeen. While the 2012 TOD Master Plan acknowledges the mobility need to cross US 40 and the Amtrak and

MARC train right of way, other border mobility impediments are left unaddressed. As the area around Ripken Stadium has begun to develop with residential and office uses, there is a significant distance between it and the Aberdeen Main Street and TOD District. The Draft Plan does not address this gap, which could be part of a pedestrian and local transportation plan. Helping to bridge that transportation gap may also include reevaluating the area between the two areas along Aberdeen Thruway and an improved connection across Interstate 95. The single road crossing to get from the Main Street area to four different schools on W Bel Air Ave is an at-grade rail crossing on the Norfolk Southern Railway (NSR) right of way that could use an alternative mobility solution as well.

It is unclear if the current transportation system provides adequate and convenient access to/from APG and if there would be a need to enhance multimodal access to/from APG. For instance, the current MARC/Amtrak Station and MDOT MTA's Commuter Bus Line 420 do not necessarily provide direct access to APG. It is unclear how convenient it is for transit riders to access APG. It is also unclear how easy pedestrians or bicyclists can get access to APG. The city may want to discuss these possible issues or include a strategy in working with APG to address the need.

Goal 3 Strategy 5 (page 7-2) calls for updating development regulations including Adequate Public Facility Ordinance (APFO) to help implement multimodal transportation in the city. Planning staff recommends the city consider alternative transportation such as walking, biking, and transit as part of the APFO requirements if the city has not done so. As a reference on how to address multimodal APFO requirements, please check out the City of Rockville's Comprehensive Transportation Review, <https://www.rockvillemd.gov/DocumentCenter/View/236/Comprehensive-Transportation-Review-Policy?bidId=> which provides guidance for all new developments to address multimodal transportation needs.

Planning notes that the 2011 Plan identified a consideration for providing a commuting alternative for those headed to APG and the surrounding areas, therefore also reducing the number of vehicles traveling through Aberdeen. The 2011 Plan suggested that a commuter parking lot be established convenient to I-95 with shuttle service to APG, made possible by coordination with MTA and Harford County Transit Services. The 2011 Plan also noted that the APG Garrison was completing plans to provide a shuttle from Aberdeen Train Station to the installation.

- Planning suggests reintegrating these (or similar) considerations into the Draft Plan, recognizing that transit and commuting patterns have shifted over the last few years. With a workforce of over 18,000 (page 5-77) it is important for Aberdeen to continue coordination with installation officials on commuting trends and infrastructure needs to not overwhelm Aberdeen's existing transportation network. Promoting a multimodal transportation system will support Aberdeen as well as APG mission growth and workforce needs. If full reintegration is not feasible prior to adoption of the Draft Plan, the city may want to consider adding a recommendation or action for developing commuting alternatives in coordination with APG as a plan implementation measure.
- The Draft plan states that "Aberdeen [should] coordinate closely with Harford County and MDOT SHA to ensure that new development and redevelopment projects that impact transportation infrastructure in and around Aberdeen are coordinated" (page 7-30). Planning supports this statement. Additional coordination with APG will keep Aberdeen informed of installation growth that could have impacts on regional roadway congestion and capacity.



### Freight Rail

The Transportation Chapter should provide some information on Norfolk Southern Railway (an active freight rail line traversing the city). Future growth and development are planned along the freight rail line corridor (refer to Chapter 5-Municipal Growth). To help preserve the railway and industrial land as valuable freight and economic development resources, Planning staff suggests the Plan address freight rail safety measures and compatible land use and designs along the railroad corridor. The 2012 TRB's National Cooperative Freight Research Program Report 16 – Preserving and Protecting Freight Infrastructure and Routes provides useful guidance on how to avoid conflicting land use and mitigate existing uses to achieve rail-compatible development, e.g., compatible zoning, minimum setback standards, and designs on lots and building layouts. In addition, MDOT also provides technical assistance to help local jurisdictions to address freight safety and freight-related land use planning issues as part of MDOT's efforts to implement the Maryland State Freight Plan and the Maryland State Rail Plan.

### Parking Issues

The Plan provided general information on various parking facilities including EV charging on parking spaces and mentioned consideration of shared parking (7-19) and the need for parking expansion at the transit station (7-32). Planning suggests considering other parking issues, such, wayfinding sign for parking, more for EV charging stations on public parking spaces, truck parking needs for e-commerce industrial and freight land uses, and commuter park & ride lots. The Plan could also include a parking strategy to address shared parking, the parking expansion need at the transit station, and any other parking issues as well.

### Resources

For additional resource references, the city may check out Planning's [Reinvest Maryland Toolbox \(https://apps.planning.maryland.gov/reinvestmd/\)](https://apps.planning.maryland.gov/reinvestmd/) which provides information on over 100 state and federal funding and technical assistant programs to assist local jurisdictions to implement their comprehensive and other local plans. In addition, *A Better Maryland* (the new State Development Plan) (<https://abetter.maryland.gov/resources/Pages/default.aspx>) categorizes state plans and programs that could help local jurisdictions prepare and implement various local plans. <https://abetter.maryland.gov/resources/Pages/default.aspx>

#### **(ix) a water resources element.**

Planning commends the city for its focus on protection of water resources in the Draft Plan, and on incorporating goals and strategies to plan for and mitigate the effects of climate change. Planning also commends the city for completing an analysis of two land use scenarios to determine non-point source loading and the change in impervious surface area. The city's inclusion of the Flood Resiliency and Climate Action Adaptation section on page 10-27 is a good start to acknowledging how climate change will impact water resources and incorporating recommendations from the 2022 Water Resources Element Guidance Update into the water resources element (WRE). The Draft Plan's WRE deals directly with future growth projections (and is in part the basis for the municipal growth element) and identifies broad goals for increasing resiliency and handling runoff with specific projects listed for each throughout the chapter.

However, in the Growth Projections section (page 10-7), it is acknowledged that Aberdeen's water system cannot handle the "Ultimate Build-Out Scenario", and page 10-8 suggests that even Scenario 1 will

surpass current capacity. Providing new capacity should be listed as a goal and tied to specific strategies within the Draft Plan. The city may want to consider whether the water treatment plant will need to be expanded, and, if so, whether more land area and moving the plant to a different parcel will be required. Planning acknowledges that the city has stated in the Draft Plan that they should complete a Water Capacity Management Plan; and recommends that the city include a recommendation for a study to identify where the additional needed water capacity can be sourced from and whether the treatment plant will require expansion and relocation.

Table 10-3 provides different build out scenarios, but the notes beneath it are unclear on whether either scenario includes existing development or not. The language should be clarified.

There is a discrepancy between the EDUs listed for Scenario 1 in Table 10-3, page 10-8 (18,628) and the EDUs for Scenario 1 listed on page 10-16 (18,354). This discrepancy also may have affected the total mgd calculated for Scenario 1 in different sections of the WRE (for example, 8.128 MGD for wastewater demand compared to 7.557 MGD for water demand). Planning recommends these discrepancies be evaluated and resolved.

There seems to be a discrepancy between the Scenario 1 mgd listed on page 10-16 (4.128 [plus the 4.0 mgd peak daily capacity listed on page 10-3= 8.128 mgd]) and the nutrient loading limit for total nitrogen at future flows listed on page 10-19 (78,420 lbs/year). Using the formula of  $\text{lbs/year} = \text{mgd} * \text{mg/L} * 8.344 * 365$ , the 78,420 lbs/year of future flows equates to about 6.44 mgd, which doesn't match the 8.128 mgd mentioned previously. Planning recommends that the plan clarify this.

On pages 10-21–10-22, the WRE indicates that under Land Use Scenario 2, nutrient runoff and impervious surface area will decrease; however, the WRE does not explain how these decreases will be achieved under the scenario. Planning recommends that a statement be added to explain the reasons for the decreases.

In coordination with Harford County and the Maryland Department of Environment, Planning recommends that the city identify and document existing flood prone areas, including areas not in a FEMA floodplain (urban pluvial flooding). Planning also suggests conducting an assessment of areas at risk of flooding in the future due to climate change. The city could then use this information to identify potential flood mitigation projects and incorporate this information into the County Hazard Mitigation Plan to support future FEMA funding requests. Finally, consider including this information in city information support systems for land development planning.

The following recommendations are based on the [2022 Water Resources Element \(WRE\) Guidance Update](#):

1. A checklist of best practices to identify and plan for suitable receiving waters is within the 2022 WRE Guidance at <https://planning.maryland.gov/Pages/OurWork/envr-planning/water-resources-mg/2022/02/framework-checklist.aspx>. The state requests that local governments meet the best practices in this WRE Guidance Update as best they can within the limitations of cost and time. The town has addressed some of these elements in its WRE, such as identifying the impaired status (watershed categories) of the Swan Creek, Bush River, and Aberdeen Proving Ground watersheds, as well as the potential pollutants, major WWTP(s) located within the watersheds, and the current nutrient discharge loads and ENR load caps (page 10-22–10-24). Some examples of best practices from the checklist that the city should consider implementing include a Pollution Risk Assessment; load reduction tracking; strategies for ensuring a higher-than-minimum-

requirements-level of water quality restoration and protection; and identification of recurrent flooding areas and evaluation of whether climate change and planned development will worsen those conditions, along with changes to the land use plan where warranted.

2. All local jurisdictions in Maryland are and will continue to experience climate change impacts on water resources and water infrastructure (water, sewer, and stormwater)—for example, page 11-15 of the Draft Plan mentions a goal to “[p]lan for resiliency in the face of more frequent floods caused by climate change and reduce flood induced pollutants to local waters and the Chesapeake Bay”—as well as water impacts on communities. Chapter 11 Implementation Strategy lists four strategies to implement the goal stated above, including “[e]ducating property owners of repetitive loss properties on adoption to better withstand threats of climate change and about options offered by the Maryland Department of the Environment.” The city should consider adjusting the WRE to include additional strategies focused on improving local understanding of current or expected water-related climate change impacts at the local level, and if sufficient information exists, the WRE should add additional strategies to address these impacts. Best practices for integrating water-related climate change adaptation into the comprehensive plan are listed at <https://planning.maryland.gov/Pages/OurWork/envr-planning/water-resources-mg/2022/03/climatechange-checklist.aspx>.
3. If the land use changes in the city’s comprehensive plan are planned in a watershed(s) prone to riverine or urban flooding (according to Map 9-4 Flood Hazard Areas, there are several areas within the development envelope that are in the 100-year floodplain), then the WRE should be adjusted to incorporate the flooding-related components of the 2022 WRE guidance. See <https://planning.maryland.gov/Pages/OurWork/envr-planning/water-resources-mg/2022/02/framework-cwa-wqfloodmgmt.aspx>. At a minimum, the WRE should indicate the extent of current local knowledge concerning flood-prone areas and should discuss whether implementation of the land use plan will increase, decrease, or have no effect on those flood-prone areas. If the local government does not know what type of impact implementation of the land use plan will have on flood-prone areas, then at a minimum, the WRE should call for a study to determine this.

**(2) If current geological information is available, the plan shall include a mineral resources element.**

The Draft Plan does not include a mineral resources element, but the 2011 version of the comprehensive plan does in Chapter Six. Planning recommends that the same content be included in this plan, if applicable and if current geological information is available.

**(3) The plan for a municipal corporation that exercises zoning authority shall include a municipal growth element.**

The municipal growth element (MGE) included in the Draft Plan similarly lacks specific goals. The goals appear passive and do not have action items nor time frames that would trigger or be triggered by lower or higher than expected growth. They do not differ from goals listed elsewhere in the Draft Plan and do not deal specifically with different growth scenarios. Planning recommends that the municipal growth element present a balance between land supply (capacity) and demand (future forecast) – when possible.

If excess capacity exists like this plan, some recommendations could be proposed to ensure efficient use of land and infrastructure, and desired land use patterns.

The terms zoning and land use seem to be used interchangeably in the methodology section explaining development capacity. Estimated capacity is typically based upon zoning and not land use. Step one describes using zoning and step 2 states “Summarize vacant land by land use”. Step 4 refers to MDP’s generalized zoning categories and, also, Table 5.18: Land Use and Density Calculations. It appears that this table is referring to zoning and not land use.

The land use categories in Chapter 4 have different maximum density yields than what is listed in Table 5.18 (page 5-84). For example, medium density residential on page 4-3 says densities range from 2 to 8 du/acre and Table 5.18 says 3.5 to 10 du/acre and high density residential on page 4-3 states the minimum is 8 du/acre whereas Table 5.18 is 10 du/acre. Perhaps chapter 4 is referring to zoning and instead of land use?

MGE Goal 6, bullet one. There is no discussion of the constraints of water and sewer service in the Draft Plan. Planning suggests that any constraints on future water and sewer service be identified. Any constraints may also be identified in one of the future amendment cycles of the Harford County Master Water and Sewerage Plan.

Table 5-1, page 5-6, identifies 13 Planning Areas within Aberdeen and classifies them as either Growth or Buffer areas and ranks them from low to high priority. It uses an example drawn from the water resources element for the Bush Chapel Planning Area that estimates that 1,200 DUs and 520 EDUs could be developed in this area. The Bush Chapel Planning Area is listed with an expected 2,196 EDUs in the Scenario 1 Expected Build-Out, but 3,996 in the Aggressive Build-Out (Table 10-3). The Table 5-1. Planning Areas has some errors in number: Under EDUs column, Aberdeen, Pulaski and Old Philadelphia should have respectively 13,680, 236 and 163. Under Acres column, Bush Chapel should be 775.93 for consistency.

Planning suggests that the Aggressive Build-Out scenario be discussed throughout the Planning Areas analysis.

Planning Area 1 – Aberdeen (5-23) has a well-written summary of the growth needs and expectations for Aberdeen, which could be extrapolated into the rest of the Draft Plan. While still lacking in specific goals and solutions, it references other studies and needs that the Draft Plan could strive for including in the other planning areas below.

Planning Area 2 – Swan Creek. Planning notes this Planning Area’s proximity to the APG installation boundary and the importance of leaving this area preserved not only for environmental reasons but also military considerations. Buffer Areas can limit the effects of encroachment and maximize land inside the installation that can be used to support the installation’s mission and training activities.

Special Growth Area – Aberdeen Proving Ground. Planning understands that the APG Planning Area was removed from this Draft Plan per feedback from the Aberdeen Planning Commission and Planning staff (page 5-9) as annexation of this federal land is not under consideration. However, APG is still included on Table 5-1. Planning Areas (page 5-6) and in a dedicated section titled “Special Growth Area – Aberdeen Proving Ground” (page 5-77).

- While Planning does not recommend removing APG from Table 5-1, as the department agrees that APG should be considered as a unique Planning Area for the city, it would be beneficial to

make a footnote as to why it is included on the table. Planning commends Aberdeen for acknowledging APG in the municipal growth element.

- Planning also notes that it would be beneficial to elaborate on *how* “the City will continue to coordinate with Harford County and APG to ensure growth in these areas [APG and other removed Planning Areas as noted] is accounted for in City services, as appropriate” (page 5-9).

Regarding the Future Land Use Recommendation of this section, Planning notes the value and potential of the [Army Compatible Use Buffer \(ACUB\) Program](#), which the Draft plan describes on page 5-77, and encourages Aberdeen to consult with APG’s environmental specialist on the installation’s established successes and potential to increase the use of the program.

Table 5-3, page 5-26. Why is the developable area so much less than the corresponding Future Acreage for each zoning district? Is Table 5-3 associated with a planning horizon or build-out? These questions may be applicable to several of the other Planning Area tables.

Planning Area 8 – Aldino-Stepney (5-53) is listed as High-Priority for Low-Density Residential Development despite being outside of both the Harford County Development Envelope (which was created to focus growth and “act as a safeguard against rampant expansion of development that may have compromised the very qualities that make Harford County special” (HarfordNext 2016, Page 32) and the municipal Priority Funding Area. Planning suggests that this area be removed from the “High Priority Growth Area” designation as these properties are former agricultural lands, woodland, and basically areas that might be better preserved prior to infill development occurring. This priority seems to be at odds with other goals such as TOD, Main Street revitalization and infill development.

Planning Area 9 - Gilbert (5-57) is listed as High-Priority for Low- to Medium-Density Residential and Limited Mixed-Use/Commercial despite being outside of both the Harford County Development Envelope and the PFA. It is also within a flood hazard zone and identified as having sensitive species. Planning suggests that this area be removed from the “High Priority Growth Area” designation for the reasons stated on Planning Area 8.

Planning Area 10 – Long/Heat (5-61) is listed as High-Priority for Low-Density Residential Development and Commercial Development despite being outside of both the Harford County Development Envelope and the PFA. Planning suggests that this area be removed from the “High Priority Growth Area” designation for the reasons stated on Planning Area 8.

The text on Page 5-81 above Table 5-16 estimates an additional 709 households by 2030 and then Table 5-17 shows projections out to 2040 and Tables 5-22 and 5-24 project out to 2028. It’d be helpful to see projections out to a “horizon year”.

Planning Areas 8, 9 and 10 are currently zoned (at least partially) for Agriculture and are designated as Growth Tier 4: Priority Preservation Area, Rural Legacy Area, Protected Lands, Ag Forest (Map 5-3). The High-Priority designation would seem to be at odds with the housing element’s stated intentions to incentivize development around the TOD District and to address the need for smaller residences by allowing additional low-density areas to build up. Table 5-19 shows there is an estimated infill residential development capacity of 669 units. Based on the projection of 709 households by 2030, it appears the city can provide through infill, all but 40 units. Road capacity is also addressed as an issue for these areas. Planning recommends they be reclassified as “Buffer” areas.

### **Growth Tiers**

Planning acknowledges that the draft comprehensive plan incorporates the town's 2012 growth tier map, established through concurrence with Harford County's tier map, into the comprehensive plan as Map 5-3 as required by § 1-416(a) or § 3-301(a) of the Land Use Article. Planning appreciates the Town's proposed goal to continue working closely with Harford County Planning and Zoning and the Maryland Department of Planning to ensure future annexations are consistent with growth tiers (page 11-5). If not already completed, Planning recommends the city re-evaluate its 2012 tier map against proposed revisions to the municipal growth areas since the 2011 plan and any changes in existing and planned sewer service since the tier map was adopted in 2012, and make any updates needed to ensure conformance to the statutory mapping criteria in Section 1-508 of the Land Use Article in coordination with Harford County and the City of Havre de Grace. Under Section 1-504 of the Land Use Article, if Aberdeen adopts an amended Growth Tier Map, then the city must notify and provide Planning with all information necessary to allow for the department's detailed review required under Section 1-505 of the Land Use Article. If requested, Planning can complete a detailed review of any proposed tier map amendment before the plan is adopted.

Page 5-13 of the draft plan includes a summary of the growth tier map requirements. The phrase "requires all local jurisdictions" should be replaced with "provides an option to local jurisdictions" (as noted on page 1-5) to clarify that jurisdictions are not required to adopt growth tiers in the following sentence: "The legislation requires all local jurisdictions in Maryland to develop and adopt a system of Growth Tiers for future residential development".

Under the Tier 3 criteria in Table 5-2 of page 5-13, please clarify that the "Areas planned and zoned for large lot or rural development" must also not meet Tier IV criteria. Please also add "Areas dominated by agricultural or forest land" to the Tier IV criteria.

### **Economic Development**

Chapter 8, Economic Development, contains a broad list of goals for revitalization and creating a better business environment. This goals list could address the weaknesses listed in the SWOT analysis (page 8-3) with specific goals and progress measures to make them stronger. Planning suggests including an analysis (or strategy to complete one) of retail and business needs nearby, as well as strategies to resolve them.

The listed strategies on page 8-1 and 8-2 are based on promoting and encouraging different approaches to expanding retail and broadly revitalizing downtown, but few examples of how these goals would address specific needs are included. For example, an overabundance of residential buildings near Ripken Stadium and office buildings near the downtown mixed-use area are both issues that could be addressed through zoning changes or transportation policy that would better enable connections between the stadium area and Aberdeen's main street/TOD zone.

Planning appreciates the inclusion of the state's Military and Civilian Compatible Use Project as a section in the Economic Development chapter (page 8-27). Planning recommends the following to make this section more effective:

- The \$55.5B in economic impact from the state's military facilities in the first paragraph should be cited from the [2016 Economic Impact Analysis of Maryland's Military Installations](#).
  - The Department of Commerce is currently working to update this report and Planning encourages this figure to be updated if available before comprehensive plan adoption.

- This report also includes detailed information outlining the specific economic impact of APG; however, this data is also being updated from the 2016 analysis.
- Consider making the focal point of this section [APG's 2015 Joint Land Use Study \(JLUS\)](#) - as noted in the third paragraph of this section. A feature element of this document is the implementation plan that contains a series of strategies for the installation to consider as it evolves. Key strategies include enhancing coordination between APG and jurisdictions (page 39 of the JLUS), engagement of APG on area planning issues (page 47), and other strategies that involve collaboration between Aberdeen and APG.
  - This section could be strengthened by highlighting actions Aberdeen could take to help strengthen communication and coordination with the installation; for example, actively inviting/including (or continuing to include) installation representatives as part of the plan review process.
- Planning notes that the state's Compatible Use Website and Handbook, expected to be available by early 2023, will include extensive resources that the city can use to support compatible use. Aberdeen should consider adding a discussion or strategies to the Draft Plan describing how the city may access these resources as part of plan implementation. For example, website users will be able to:
  - Learn additional information about APG, including specific military planning studies that the installation has conducted and other community resources that may be available.
  - Explore local government planning in Maryland and tools that support compatibility between the installation and community, including a mapping tool that geospatially illustrates impacts such as noise contours, military training routes, and other characteristics that may impact the surrounding community.
    - Other tools that may be of interest to Aberdeen include local ordinance development guidance pertaining to military activities, resources for improving communication and collaboration, and information on how jurisdictions can incorporate military installations into their comprehensive plans.
  - Read about best practices that military installations and communities have used to effectively address and mitigate issues that may affect the community's ability to grow and/or the installation's ability to conduct operations and training.
  - Note: the above suggestions could replace the information in the last paragraph ("To complete the website and technical handbook, MDP hired a Compatible Use Community Planning Liaison...").

### **Suggested Technical Edits**

In Chapter 1 - Introduction, the Draft Plan references Aberdeen Proving Ground (APG); however, the Regional Location Map, page 1-1, does not identify APG, nor Havre de Grace. APG is depicted as part of unincorporated Harford County. Consider identifying the boundaries of APG, as it abuts the city.

On page 1-2, last paragraph, the Draft Plan acknowledges that the update provides the opportunity to review current regulations and zoning maps, and changes identified in the Draft Plan to address solutions. However, no such analysis could be found in the Draft Plan.

On page 1-6, paragraph one, Plan Aberdeen Update, the Draft Plan evaluates priority issues identified in the update process; however, it is unclear where these priority issue evaluations are discussed later in the Draft Plan and where goals and actions are identified to address these priority issues.

On page 1-9, last paragraph, the Draft Plan indicates that ultimately the city will guide its decisions based on the goals and objectives in the Draft Plan. However, as noted in this review, many of the objectives are not clear and appear to defer identifying the necessary changes to be considered.

In Chapter 2 – City Profile, the Draft Plan utilizes 2020 ACS and U.S. Census data, but the analysis identifies past trends, and there are no future planning horizon projections. It is also unclear if the planning horizon is 10-years, or longer since the various tables in the MGE appear to be build-out projections of acreage and units.

Page 2-4 indicates that the comprehensive plan coincides with the Decennial Census data that was available to the city at the time of plan drafting. The city should consider all the available Census data prior to adoption of the plan. The Maryland State Data Center website includes the most current Decennial Census Data. It is not clear what is meant by the note “If ACS Data is used”. The ACS data is an estimate and seems improbable that the ACS estimate of 15,904 would be the same as the 2020 Census data. The same follows for Table 2-7, Educational Attainment, where it is unclear if the data is from ACS or the 2020 Census.

Chapter 3 - Community Facilities Element, Goals, page 3-1, bullet two. Why is the threshold 100 lots? How many vacant parcels are large enough to accommodate 100 lots? Also, Apartment developments that may be located on a single lot but have more than 100 units, would appear to be exempt from this.

Page 3-2, bullet five. The Draft Plan references a 2033 planning horizon year instead of the 2040 horizon mentioned elsewhere.

On page 3-4, Planning Commission, the city should consider adding preparation of the Local Jurisdictional Annual Report, and the 5-Year Mid Cycle Review Report as new duties of the Planning Commission. A zoning code amendment may be advised, if the current zoning code does not state these activities as duties of the Planning Commission,

On page 3-15, Parks and Recreation Facilities, bullet five should be revised to include a standard for pocket parks in the mixed-use areas of town as well.,

Planning staff suggests changing the label, “Goals and Objectives” on page 7-1 to “Goals and Strategies” to be consistent with the labels in Chapter 11-Implementation. Other chapters should also label as “Goals and Strategies.” This is just a suggestion.

On page 7-1 - refer to Goal 1\_Strategy 3), it should replace the Statewide Transportation Improvement Programs (STIP) with the Maryland Consolidated Transportation Program (CTP). Planning staff believes the strategy statement means the CTP.

On page 7-1 -refer to Goal 2\_Strategy 2 please add “implement” in the sentence as “.....and implement the TOD Master Plan.”

On page 7-1 - refer to Goal 2\_Strategy please add “pedestrian” to the sentence as “.....the US 40 Pedestrian and Bicycle Study.”



On page 7-10, please review the accuracy of the AADT definition. Planning staff believes that “in 24 hours” should be changed to “in a year.”

**Is the jurisdiction a Sustainable Community?**

Planning notes that the city is within a Sustainable Community. As part of the Sustainable Community designation, quality of life, environment, economy, transportation, housing and local planning and land use are all subjects of the Action Plan. Planning suggests the city review the Action Plan for consistency with the Draft Plan and consider if any of the actions it includes can support implementation of the Draft Plan’s strategies. The following is a link to the Sustainable Communities designation for the city:

[https://dhcd.maryland.gov/Communities/Approved%20Sustainable%20Communities/aberdeen\\_app.pdf](https://dhcd.maryland.gov/Communities/Approved%20Sustainable%20Communities/aberdeen_app.pdf)

Aberdeen’s Sustainable Communities Renewal Application from 2020 contains many goals and strategies to achieve in its action plan. A harmonious approach to the development of the comprehensive plan and the sustainable communities action plans should be a goal of the community and Planning suggest that the city ensure that the planning tools complement each other to achieve the best and most efficient tools to achieve updated and affordable housing, efficient transportation systems, and an effective TOD Master Plan.

Benchmarks for both the Draft Plan and Aberdeen’s Sustainable Communities application to measure each plan’s goals will help to inform a future Sustainable Communities action plan, as well as the 5-Year Annual report (midpoint review) to examine which goals are on track in each plan and account for different growth scenarios.

If Planning can be of any further assistance or facilitate assistance/information from other State agencies as the city the processing of comprehensive plan, please contact Brooks Phelps at [brooks.phelps@maryland.gov](mailto:brooks.phelps@maryland.gov).

**Maryland Department of Planning Review Comments**  
**12/9/22**  
**City of Aberdeen Draft 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 Comprehensive Plan as part of the standard 60-day review period for municipalities. 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 25: Maryland Department of the Environment

Page 27: Maryland Department of Housing and Community Development

Page 30: Maryland Department of Transportation

Page 35: Maryland Department of Natural Resources

Page 39: Maryland Historic Trust



# Maryland

## Department of the Environment

Larry Hogan, Governor  
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary  
Horacio Tablada, Deputy Secretary

August 23, 2022

Mr. Joseph Griffiths  
Maryland Department of Planning  
301 West Preston Street  
Suite 1101  
Baltimore, MD 21201

RE: Local Plan Review  
Comprehensive Plan Amendment: Bryans Road Sub-Area Plan  
MD20220726-0637

Dear Mr. Griffiths,

Below are the comments from the Maryland Department of the Environment regarding the above referenced project. Our response code is R1.

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 and Materials 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 Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Solid Waste Program should be contacted directly at (410) 537-3315 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.

Mr. Joseph Griffiths  
Page 2

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 1978 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.

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 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.

Please let me know if you have any questions or concerns.

Sincerely,

*Amanda R. Redmiles*

Amanda R. Redmiles  
Interdepartmental Information Liaison  
Maryland Department of the Environment

December 5, 2022

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 and comment on the City of Aberdeen 2022 Comprehensive Plan (the “Plan”). When reviewing plans, the Maryland Department of Housing and Community Development (“DHCD”) comments on items for which political subdivisions can strategically leverage DHCD’s resources to accomplish their housing and community development goals. DHCD also reviews comprehensive plans for consistency with relevant statute and, if appropriate, Sustainable Communities Action Plans.

Overall, DHCD staff were impressed with the quality of the Plan. Staff in the DHCD Division of Neighborhood Revitalization reviewed the plan and provided the following comments, which are meant to help realize the Plan’s goals. We present the following in no particular order:

1. The housing and economic development components of the Plan are consistent with and build upon the Sustainable Communities Action Plan. In particular, the Action Plan and the Plan both note that while workforce housing is present, it is not being utilized as much as is desired.
2. The Plan identifies a need to address vacant housing for which the DHCD’s Community Legacy Program grants could assist. Planning staff can learn more about Community Legacy online at <https://dhcd.maryland.gov/Communities/Pages/programs/CL.aspx> or contact the Eastern Shore Regional Project Manager, Bill Hersch, at 410-209-5810 or [william.hersch@maryland.gov](mailto:william.hersch@maryland.gov). The Action Plan shows that the City has already leveraged DHCD funding to improve residential facades and remove blighted properties, making development within the specific residential corridors more appealing to both investors and residents.
3. DHCD can further assist with home repairs that improve comfort, livability, and accessibility for homeowners through its Special Loan Programs. Planning staff and residents can learn more about these programs at <https://dhcd.maryland.gov/Residents/Pages/SpecialLoans.aspx> or contact the program directly at 301-429-7409 or [DHCD.SpecialLoans@maryland.gov](mailto:DHCD.SpecialLoans@maryland.gov).
4. The Plan identifies a need to address dilapidated housing for which DHCD’s Strategic Demolition Fund (SDF) grants could assist. Planning staff can learn more about SDF online at

<https://dhcd.maryland.gov/Communities/Pages/programs/SDF.aspx> or contact the Eastern Shore Regional Project Manager, Bill Hersch, at 410-209-5810 or [william.hersch@maryland.gov](mailto:william.hersch@maryland.gov).

5. The Plan does not show that Aberdeen has conducted a point-in-time count to identify the total number of people experiencing homelessness in Aberdeen, and the Plan does not identify goals or actions regarding services for people experiencing homelessness. For information on DHCD's programs addressing homelessness, please see more online at <https://dhcd.maryland.gov/HomelessServices/Pages/GrantFunding.aspx> or contact the Homelessness Solutions Program Manager, Suzanne Korff, at 410-209-5850 or [Suzanne.Korff@maryland.gov](mailto:Suzanne.Korff@maryland.gov).
6. The Plan identifies the community's needs with respect to income and poverty. Aberdeen or non-profits active in Aberdeen may be eligible to apply for discretionary Community Services Block Grant (CSBG) funds administered by DHCD in order to provide services for low-income individuals and families at or below 125% of poverty. Planning staff can learn more about CSBG programs online at <https://dhcd.maryland.gov/Communities/Pages/programs/CSBG.aspx> or contact the Poverty Solutions Team at 301-429-7525 or [csbg.dhcd@maryland.gov](mailto:csbg.dhcd@maryland.gov).
7. The Plan identifies a need for affordable housing, including workforce and low-income housing. A portion of Aberdeen is within a HUD Qualified Low-Income Housing Tax Credit (LIHTC) Census Tract and currently has four LIHTC properties totaling 366 units. Aberdeen also has one subsidized senior housing property totaling 122 units. If planning staff want to support further LIHTC development, they may find more info online at <https://dhcd.maryland.gov/HousingDevelopment/Pages/lihtc/default.aspx> or contact Edward Barnett, Director of Rental Lending, at 301-429-7740 or [edward.barnett@maryland.gov](mailto:edward.barnett@maryland.gov).
8. A portion of Aberdeen is within a Maryland Mortgage Program ("MMP") target area and residents therefore have enhanced eligibility for the state's homeownership incentives. Planning staff and residents may learn more about Maryland's homeownership programs at <https://mmp.maryland.gov/pages/default.aspx>.
9. Aberdeen's downtown has been designated as a Maryland Main Street. More information on the revitalization benefits associated with this designation can be found online at <https://dhcd.maryland.gov/communities/pages/programs/mainstreet.aspx> or by contacting Amy Seitz, the Main Street Coordinator, at 410-209-5813 or [amy.seitz@maryland.gov](mailto:amy.seitz@maryland.gov).
10. The Plan identifies a need to support businesses in the town's core. Info on DHCD's support for businesses can be found online at <https://dhcd.maryland.gov/Business/Pages/SmallBusinesses.aspx> or by contacting Mike Haloskey, Director of Business Lending Programs, at 301-429-7523 or [Michael.Haloskey@maryland.gov](mailto:Michael.Haloskey@maryland.gov).
11. The Plan's Housing Element does not include an assessment of fair housing. Although it identifies the importance of providing "housing opportunities for all ages, incomes, and abilities," it does not assess Aberdeen's current or future fair housing status with respect to individuals with these or other "protected characteristics." House Bill 90 requires, effective January 1, 2023, that comprehensive plans include an assessment of fair housing. For technical assistance in development of the Plan's Housing Element, please contact staff at the Maryland Department of Planning.



We in the Division of Neighborhood Revitalization look forward to continuing our productive partnership with Aberdeen in its future initiatives. Again, thank you for the opportunity to comment on the Plan. If you have any questions regarding the comments above, please contact me at [carter.reitman@maryland.gov](mailto:carter.reitman@maryland.gov) or 410-209-5849.

Sincerely,

Carter Reitman  
Program Manager, State Revitalization Programs

Cc: David Dahlstrom, Maryland Department of Planning  
Susan Llareus, Maryland Department of Planning  
Brooks Phelps, Maryland Department of Planning  
William Hersch, DHCD Division of Neighborhood Revitalization  
John Papagni, DHCD Division of Neighborhood Revitalization



November 15, 2021

Brooks Phelps  
c/o Rita Pritchett  
Maryland Department of Planning  
301 West Preston Street, Suite 1101  
Baltimore MD 21201

Dear Mr. Phelps:

Thank you for coordinating the State of Maryland's comments on the City of Aberdeen 2022 Comprehensive Plan. The Maryland Department of Transportation (MDOT) offers the following comments for the plan for consistency with State of Maryland and MDOT's goals and objectives:

**General Comments**

- In general, the plan is consistent with MDOT plans and programs. The MDOT supports the City of Aberdeen's "Transportation Goals and Objectives."
- The MDOT also supports the plan's "Main Goals", especially to consider rezoning opportunities for the Transit Oriented Development (TOD) District, evaluate the City's TOD Regulating Plan for potential amendments to the Development Code for the TOD District, and as stated, potential improvements to the Main Street area. The MDOT is prepared to coordinate with the City of Aberdeen to ensure that TOD is supported by adequate transportation enhancements. These types of efforts will direct growth to existing communities within designated areas for improved connectivity, which MDOT supports.
- When referring to matters related to state-owned streets, roads, and highways in the plans, the phrase "Maryland Department of Transportation State Highway Administration" or "MDOT SHA" should be incorporated into the Plan.



- The MDOT encourages the County to work with MDOT SHA to identify specific opportunities for traffic calming, sidewalks, bike paths, street lighting, crosswalks, and pedestrian amenities. Please coordinate with Ms. Lisa Minnick Sirota, Regional Planner, Office of Planning and Preliminary Engineering, MDOT State Highway Administration (MDOT SHA), at 410-545-5550, or via email at [LSirota@mdot.maryland.gov](mailto:LSirota@mdot.maryland.gov).
- The MDOT supports continued improvements to expand and enhance transit options. Please continue to coordinate with the MDOT Maryland Transit Administration (MDOT MTA) for the ongoing expansion of regional transit and the coordination of MDOT supported locally-operated transit services (LOTS). The MDOT MTA also supports park and ride (with MDOT SHA), demand response services, paratransit, medical services, and senior-center transportation options. For local transit service planning, please contact Mr. Chris Taylor, MDOT MTA Regional Planner at 410-767-3142, or via email at [CTaylor7@mdot.maryland.gov](mailto:CTaylor7@mdot.maryland.gov).
- 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 plan. The program offers an extensive menu of commuter transportation services, such as ridesharing. Please visit [www.CommuterChoiceMaryland.com](http://www.CommuterChoiceMaryland.com) for more information.

## Specific Comments

### Chapter 7: Transportation

- Page 7-1, Goals and Objectives – Consider adding “Continue to work with Harford County to ensure Aberdeen’s transportation priorities are included in the Baltimore Regional Transportation Board (BRTB) Long Range Transportation Plan.”
- Page 7-4, Table 7-1 – MD 132A (the State-owned portion of Beards Hill Road) is a Minor Arterial
- Map 7-5 (No Page Number), Existing Bicycle Network – Consider incorporating the bicycle level of traffic stress (LTS) map into Map 7-5 to illustrate how bikeable Aberdeen streets are for varying cycling audiences.

- Page 7-14, Aberdeen Train Station – The City recently made improvements to the station using \$800,000 in funds awarded through the MDOT Transportation Alternative Program (TAP) for the Aberdeen Train Station Connectivity Enhancement Project. The improvements were a coordinated effort with the City, MDOT MTA, MDOT SHA, and the Harford County Office of Community and Economic Development. Please note that the FY2021-2026 MDOT Consolidated Transportation Plan (CTP) reports two different amounts of TAP funding: \$1,340,000 (page H-4) and \$700,000 (page BP-9): [https://www.mdot.maryland.gov/OPCP/FY21FY26\\_CTP\\_Full\\_Report.pdf](https://www.mdot.maryland.gov/OPCP/FY21FY26_CTP_Full_Report.pdf)
- Page 7-19, Pedestrian Facilities – Consider noting that the Harford County Bicycle and Pedestrian Master Plan is currently being updated and the City of Aberdeen will coordinate Plan recommendations.
- Page 7-20, Bicycle Facilities – Consider rewording the last sentence to “These segments need to be improved and expanded to improve safety and provide full connectivity throughout the City and to multi-modal transportation connections and services.” The level of [traffic] stress (LTS) score relates to how much traffic interaction a bicyclist experiences in relation to the quality of bicycle facility and adjacent traffic speed and volumes. The City should consider using MDOT’s Bicycle Level of Traffic Stress (LTS) analysis to more accurately reflect how accessible Aberdeen is by bicycle. The information can be found online at <https://experience.arcgis.com/experience/8f01552b8ff745d8902476a7c569f64c/>
- Page 7-26, Complete Streets – This section lists MDOT SHA’s “Context Driven Access and Mobility for All Users” as a resource. MDOT SHA strongly encourages Aberdeen to utilize this resource when considering transportation improvements and priorities.
- Page 7-28, Bicycle and Pedestrian Facilities, first Paragraph. – With several concerns raised for improved connection for pedestrian and bicycle facilities, consider developing or updating Aberdeen’s ADA Transition Plan to target non-compliant sidewalk gaps.
- Page 7-29, Bicycle and Pedestrian Facilities, third paragraph – Consider using MDOT’s Bicycle Level of Traffic Stress (LTS) existing conditions evaluation to better determine where bikeway improvements will improve safety, access and mobility.
- Page 7-29, Active Transportation – Consider incorporating this paragraph into the Bicycle and Pedestrian Facilities. The paragraph addresses the previously mentioned Bicycle and Pedestrian Facilities.

- Page 7-31, Other Transportation Considerations – Continue to coordinate with Harford County to identify opportunities for transportation improvements that will benefit both jurisdictions (i.e., the widening of MD 22 to relieve traffic congestion to the greater Aberdeen and Bel Air Areas).
- Page 7-31, Transportation Studies, Project, and Future Improvement Plans – This section states that there is only one project located in Aberdeen that is included in the FY 2022-2027 Consolidated Transportation Program (CTP). MDOT SHA’s Minor Projects Program (System Preservation Program) in the CTP includes additional projects located in Aberdeen but not listed. For further information contact Ms. Lisa Minnick Sirota, Regional Planner, Office of Planning and Preliminary Engineering, MDOT State Highway Administration (MDOT SHA), at 410-545-5550, or via email at [LSirota@mdot.maryland.gov](mailto:LSirota@mdot.maryland.gov).
- Page 7-34, Harford County Bicycle and Pedestrian Master Plan – Consider noting that the Harford County Bicycle and Pedestrian Master Plan is currently being updated and the City of Aberdeen will coordinate Plan recommendations.
- Page 7-35 – Please remove the Transportation Enhancement Program as this program has become the Transportation Alternatives Program (TAP). This program is a reimbursable, federally funded program for local sponsors to complete transportation-related community projects designed to strengthen the intermodal transportation system. Project sponsors are required to provide a minimum 20% of total project cost as a match. For further information contact Ms. Christy Bernal, TA Program Manager, MDOT SHA at 410-545-5675, or via email at [cbernal@mdot.maryland.gov](mailto:cbernal@mdot.maryland.gov).
- Page 7-35 – “Complete Streets Initiative” may be referring to the “Safe Streets For All” federal program.
- Page 7-35 – Please consider amending the Kim Lamphier Bikeways Network Program description. This program allocates State transportation funds administered by MDOT The Secretary’s Office (TSO) for planning, design, and construction of bicycle transportation projects. Grantees are required to provide a minimum 20% of total project cost as a match. The local matching fund contribution can be in the form of cash, an in-kind contribution, or a 3rd party contribution. For further information contact Mr. Nate Evans, Active Transportation Planner, Office of Planning and Capital Programming (OPCP), MDOT, at 410-865-1304, or via email at [nevans1@mdot.state.md.us](mailto:nevans1@mdot.state.md.us).

Mr. Brooks Phelps  
Page Five

- Page 7-35 – The MDOT SHA’s Context Driven initiative focuses MDOT’s practitioners on implementing context-appropriate improvements to emphasize safety, access, and mobility for all users, especially those more vulnerable such as pedestrians and bicyclists. Please coordinate with Molly Porter, Acting Bike Pedestrian Coordinator, MDOT SHA at 410-545-5673, or via email at [mporter@mdot.maryland.gov](mailto:mporter@mdot.maryland.gov).

Sincerely,

Heather Murphy  
Director, OPCP, MDOT

cc: Ms. Christy Bernal, TA Program Manager, MDOT SHA  
Mr. Nate Evans, Active Transportation Planner, OPCP, MDOT  
Ms. Lisa Minnick, Regional Planner, MDOT SHA  
Ms. Molly Porter, Acting Bike Pedestrian Coordinator, MDOT SHA  
Mr. Chris Taylor, Program Manager, MDOT MTA

## Comments from DNR for the City of Aberdeen Comprehensive Plan

### **DNR Forestry Service**

I reviewed Chapter 9--Environmental Resources and Sensitive Areas, and have the following comments. The Plan is very well laid out.

1. On page 9-14, it states that stream buffers are "defined by the state", but I don't see a citation, COMAR reference, etc. I would like to have that put in.
2. On page 9-23, they make the statement that "Forestry" threatens FIDS. Can this be re-worded to "...largely through land development..."? By "Forestry", I think "forest harvesting" is what is meant, and as long as land use doesn't change, these impacts are not long term.
3. Also on page 9-23, they state species need to be protected from "over development". So regular development is okay? This needs to be "any development", or maybe replace with "habitat loss".
4. On page 9-28, it states the City will conduct a comprehensive inventory of existing forestland..." I would encourage them to include a time frame, i.e. "in the next 5 years..." etc.
5. Also on page 9-28, it discusses Tree City USA A) can a link be added for the Tree Plan, or otherwise tell how it can be accessed. B) It states the City has been involved, but does it plan to remain involved? C) Can the Ordinance Number be listed for the Tree Care Ordinance? D) What was the budget for the most recent year? Can this be added here for reference?
6. As a general comment, can the actions the City intends to take be added as bullets below each paragraph? Just so the intended actions are clear from the background information.
7. In the Air Quality section on page 9-30, it states that Harford County has an "F" rating from the American Lung Association. I visited the site, and Harford has an "F" for Ozone, but the rating has been steadily improving since the mid-1990's. The last rating was 6.7, where a "passing" value is 3.2. By contrast, the values prior to 2012 were above 30. The county also has an "A" for Particulate Pollution. As an alternative, perhaps indicate that this rating is for Ozone, in particular, "but progress is being made", etc.

I reviewed Chapter 4--Land Use, and only have the following comment:

1. On page 4-5, Mixed Land Use is identified as a means to "effectively reduce contributions to climate change while improving the overall quality of life for local residents..." Maybe state this in the Climate Change section of Chapter 9 as a strategy for reducing emissions.

## **DNR Fishing and Boating Service**

The City of Aberdeen recognizes the importance of protecting its natural resources by establishing and strengthening regulations and preparing for the future as development and climate change becomes an increasing threat. This recognition fits with Fishing and Boating Services need for conservation of rural lands because of their association with productive fisheries.

Maryland Fishing and Boating Service has adopted guidelines for impervious cover (an indicator of intensity of development) to communicate changes in habitat and fisheries that influence our ability to manage important recreational and commercial fisheries. Impervious surface is used as an indicator of development because of compelling scientific evidence of its effect in freshwater systems and because it is a critical input variable in many water quality and quantity models. Impervious surface itself increases runoff volume and intensity in streams, leading to increased physical instability, erosion, sedimentation, thermal pollution, contaminant loads, and nutrients. Urbanization may introduce additional industrial wastes, contaminants, stormwater runoff and road salt that act as ecological stressors and are indexed by impervious surface.

Generally, watersheds with 5% or less impervious surface (rural watersheds) support good non-tidal and tidal fish habitat for anadromous fish (MD DNR 2022). Once a watershed exceeds 10% impervious surface (an early suburban watershed), the ability to manage fisheries becomes compromised because of habitat deterioration due to development. We estimate that impervious surface for Bush River's watershed was 14.3% with Aberdeen Proving Grounds (federal property) and 17.3% without it in 2020. Our estimate for Swan Creek in 2020 was 10.8%. With development this high, we support any recommendations and incentives to conserve remaining rural land in watersheds that drain through Aberdeen.

Blueback Herring, Alewife, Hickory Shad, American Shad, White Perch, Yellow Perch, and Striped Bass (Anadromous fish) use non-tidal and tidal waters for spawning and nursery habitat that are impacted by runoff from Aberdeen. Two non-tidal tributaries of Bush River documented with anadromous fish spawning would be affected by development associated with the City of Aberdeen: nontidal Gray's Run (Herring, Yellow Perch, White Perch) and Cranberry Run (Herring and White Perch). "Herring" is a collective term for Blueback Herring, Alewife, and Hickory Shad. Nontidal Swan Creek has White Perch and Herring spawning. Tidal waters of Swan Creek support White Perch spawning habitat, and the upper Bush River has Herring, White Perch, and Yellow Perch spawning and larval habitat. Maps depicting tidal spawning habitat for anadromous fish can be found in the Maryland Coastal Atlas <https://gisapps.dnr.state.md.us/coastalatlus/WAB2/>. Streams draining watersheds in City of Aberdeen boundaries empty into an area of Chesapeake Bay that is important habitat for juvenile anadromous fish (Uphoff et al. 2017).

Fish eggs and larvae are most sensitive to environmental perturbations. Fisheries Habitat and Ecosystem Program (FHEP) has conducted numerous studies in Bush River streams and its estuary which receive runoff from the City of Aberdeen watersheds. Spring anadromous fish egg and larval sampling conducted on the Bush River during 2005-2008 and 2014 indicated negative impact (less eggs and larvae) from development. Yellow Perch larval surveys were conducted on the Bush River

during 2006-2009 and 2011-2013; Yellow Perch larvae were abundant and larval nursery function appeared intact. Reports containing these studies can be found on MD DNR FHEP website <https://dnr.maryland.gov/fisheries/pages/fhep/pubs.aspx>.

City of Aberdeen development impacts many important fisheries resources that support recreational and commercial anglers. Tidal-fresh Swan Creek and Bush River are part of the nationally recognized upper Bay tidal Largemouth Bass fishery. Striped Bass, Yellow Perch, White Perch, Channel Catfish, Blue Catfish, Flathead Catfish, and Blue Crab are harvested by recreational and commercial anglers in these waters. Fishing is part of Harford County's heritage. According to individual license sales, roughly 8.5% of county residents purchased a recreational fishing license in 2022. Residents and visitors to Harford County can take advantage of various fishing opportunities as previously described. Commercial fishing also provides economic opportunities for Harford County residents. In 2022, 367 commercial fishing licenses were purchased, permitting them to harvest fish and crabs for market, as well as provide charter or guide trips. In order to maintain this livelihood, the county must promote sound land planning and conservation to assure fish habitat remains productive.

Other specific recommendations in the Plan related to maintaining the rural character of the watershed:

Chapter 4, Page 4-2 and 4-3. Land Use – “Influence the ability to achieve sustainability through preservation of rural agricultural land uses and historic and cultural resources” and “identify, minimize, and mitigate impacts to water resources from non-point and point pollution sources and similarly to protect other sensitive natural resources from loss or impacts to forests, wetlands, and wildlife habitats resulting from development.” These will be important for aquatic habitat integrity.

Chapter 4, Page 17. Future land use map indicates a large percentage of forested/open space land use located north of 95 changes to integrated business commercial land use. Consider land use change impacts when delineating and planning management of flood plains. Land Use changes upstream can exacerbate flooding and runoff, impacting downstream fish habitat.

Chapter 10, Page 10-20. Stormwater Management. “Stormwater retrofits and stream restoration projects within the Development Envelope are implemented through this program. The City currently uses contracted engineering services to manage its program to access its needs and develop potential projects that provide stormwater credits toward the TMDL goals, such as stream restoration projects.” Studies have not indicated that stream restoration for TMDLs is associated with restoration of biological function. Over-reliance on restoration related to TMDLs may not bring about local restoration of habitat function for fish.

Chapter 10, Page 10-22. Swan Creek. “Approximately 60% of the City of Aberdeen is in the Swan Creek Watershed. This watershed is listed as Category 3 under the Integrated Report and identifies the potential pollutants as Nutrients (nitrogen, phosphorus), Suspended Solids, and Combined Benthic/Fishes Bioassessments.” MDE (2014). Swan Creek watershed is listed under Category 5 of the 2012 Integrated Report as impaired for impacts to biological communities. Approximately 46% of the Swan Creek watershed is estimated as having fish and/or benthic indices of biological

impairment in the poor to very poor category. We encourage the City of Aberdeen and Harford County to explore alternatives and thoroughly consider impacts to fish habitat as they plan for future needs. Limit pollution sources to receiving waters and any obstructions that impeded movement of fishes.

References:

Chesapeake Bay Program. 2021. Maryland Upper Western Shore Tributary Summary: A summary of trends in tidal water quality and associated factors, 1985-2018. <https://cast-content.chesapeakebay.net/documents/TribSummaries%2FMdUpperWesternShoreTributaryTrendsSummary2021-06-07.pdf>

Chesapeake Bay Program. 2021. Tidal Trends in Water Quality. Appendix of Maryland Upper Western Shore 2018 Tributary Summary. <https://cast-content.chesapeakebay.net/documents/TribSummaries%2FMdUpperWesternShore2018BasinSummaryAppendix.pdf>

MDE (Maryland Department of the Environment). 2014. Watershed Report for Biological Impairment of the Swan Creek Watershed in Harford County, Maryland. Biological Stress or Identification Analysis Results and Interpretation. [https://mde.maryland.gov/programs/water/TMDL/DocLib\\_SwanCreek\\_02130706/Swan\\_Creek\\_BSID\\_Final\\_012714.pdf](https://mde.maryland.gov/programs/water/TMDL/DocLib_SwanCreek_02130706/Swan_Creek_BSID_Final_012714.pdf)

Uphoff, J. H., Jr., and coauthors. 2016. Marine and estuarine finfish ecological and habitat investigations. Performance Report for Federal Aid Grant F-63-R, Segment 3, 2015. Maryland Department of Natural Resources, Annapolis, Maryland. [https://dnr.maryland.gov/fisheries/Documents/F-63-R7%20Report%202016\\_09202017.pdf](https://dnr.maryland.gov/fisheries/Documents/F-63-R7%20Report%202016_09202017.pdf)





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# Maryland

## DEPARTMENT OF PLANNING

### MARYLAND HISTORICAL TRUST

November 10, 2022

Mr. Brooks Phelps  
Central Maryland Regional Planner  
Maryland Department of Planning  
301 West Preston Street, 11<sup>th</sup> Floor  
Baltimore, MD 21201

Dear Mr. Phelps:

Thank you for the opportunity to review the draft final Aberdeen Comprehensive Plan and submit comments on behalf of the Maryland Historical Trust.

In general, we recommend that the plan include a more robust description of Aberdeen's rich historic resources, as well as some discussion about how the existence of those resources, and their preservation, will support recommendations for economic development, including Main Street and downtown revitalization, and contribute to quality of life within the identified planning areas. To that end, we also recommend including reference to historic preservation financial incentives, such as the [Maryland Historic Revitalization Tax Credit Program](#), throughout the document, including listing them out in the resources section that begins on p. 8-33. You can learn more about the available financial incentives at <https://mht.maryland.gov/Financial.shtml>.

Specifically, we note that there are a number of properties missing from the list of National Register and National Register-eligible properties on p. 2-3, including:

- HA-163: [Griffith House/Wright's Log House/Wright House](#);
- HA-164: [Poplar Hill/Catherine Pusey Tenant House](#);
- HA-240: [Swansbury/Jay House/\(Barchowsky-Jay Farm\)](#);
- HA-2178 [West Bel Air Historic District Determination of Eligibility](#), which identifies approximately 60 additional properties as contributing within the district; and
- HA-2247: [Osborn Tract Addition Historic District Determination of Eligibility](#), which includes 71 properties, of which three were found to be non-contributing.

While we cannot evaluate whether these properties are still extant or still retain the integrity necessary to achieve or maintain National Register listing, we encourage the City to consider pursuing National Register designation for the two districts highlighted above, as an implementation step in this plan. National Register listing will help contributing properties within the districts qualify for historic preservation financial incentives. We also encourage you to note that MHT holds an easement on the B&O Railroad Station, which is the highest level of protection for historic properties in Maryland and ensures that MHT will review any proposed changes to the structure.

Thank you again for the opportunity to comment on the plan. If you have any questions, please contact me at (410) 697-9592 or by email at [nell.ziehl@maryland.gov](mailto:nell.ziehl@maryland.gov)

Sincerely,

A handwritten signature in black ink that reads "Nell Ziehl". The signature is written in a cursive, flowing style.

Nell Ziehl  
Chief, Office of Planning, Education and Outreach

Cc     Joseph Griffiths, MDP  
       Rita Pritchett, MDP