August 30, 2019

Edgar Harrison, Chair, Trappe Planning Commission
The Town of Trappe
P.O. Box 162
4011 Powell Avenue
Trappe, Maryland 21673-0162

Dear Mr. Harrison:

Thank you for the opportunity to comment on the draft 2019 Comprehensive Plan (Draft Plan) for the Town of Trappe. The Maryland Department of Planning (Planning) feels that good planning is important for efficient and responsible development that adequately addresses resource protection, adequate public facilities, 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 the State 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, Housing and Community Development, and Agriculture. To date, we have received comments from the Maryland Historical Trust and the Departments of Environment, Transportation, Natural Resources, and Housing and Community Development, and these comments have been included with this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

Planning respectfully requests that this letter and accompanying review comments be made part of the Town' s public hearing record. Furthermore, Planning also asks that the Town consider State agency comments as revisions are made to the Draft Plan, and to any future plans, ordinances, and policy documents that are developed.

Please feel free to contact me at (410) 767-4500 or Tracey Gordy, Senior Regional Planner for the Lower Eastern Shore, at (410) 713-3462.

Sincerely,

Charles W. Boyd, AICP
Director of Planning Coordination

Enclosures: Comments on the draft Comprehensive Plan for the Town of Pittsville.

cc: Nicholas Newnam, President, Trappe Town Council
Joseph Griffiths, Manager - Planning, Local Planning and Training
Tracey Gordy, Senior Planner - Planning, Lower Eastern Shore Regional Office

Maryland Department of Planning
Review Comments
Draft 2019 Town of Trappe Comprehensive Plan

General Comments:

The Maryland Department of Planning (Planning) has reviewed the *2019 Town of Trappe Comprehensive Draft Plan (Draft Plan)* and offers the following comments for the Town's consideration. These comments are offered as suggestions to improve the draft comprehensive plan and better address the statutory requirements of the Land Use Article. Other state agencies, as noted below, have also 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 the Draft Comprehensive Plan

This is an update to the Town of Trappe (Town) 2010 Comprehensive Plan. Planning concurs with the Town that "[t]he purpose of this Comprehensive Plan is to ensure coordinated and harmonious development in the Town and its environs while preserving the natural and traditional village settings so central to its character. The Comprehensive Plan is the primary guiding document for all decisions about the orderly development and conservation of the Town of Trappe."

Minimum State Law Requirements for Municipalities

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

Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans in Maryland			
State Comprehensive Plan Requirements	**MD Code Reference**	**Additional MD Code Reference**	**2019 Town of Trappe Draft Plan page references**
(1) A comprehensive plan for a non-charter county or municipality **MUST** include:	L.U. § 3-102(a)		
(a) a community facilities element	L.U. § 3-102(a)(1)(i)	L.U. § 3-108 -- Community facilities element.	Pages 49-56
(b) an area of critical State concern element	L.U. § 3-102(a)(1)(ii)	L.U. § 3-109 -- Areas of critical State concern element	Not Applicable
(c) a goals and objectives element	L.U. § 3-102(a)(1)(iii)	L.U. § 3-110 -- Goals and objectives element	Pages 9-15
(d) a land use element	L.U. § 3-102(a)(1)(iv)	L.U. § 3-111 -- Land use element	Pages 16 - 27

Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans in Maryland			
State Comprehensive Plan Requirements	**MD Code Reference**	**Additional MD Code Reference**	**2019 Town of Trappe Draft Plan page references**
(e) a development regulations element	L.U. § 3-102(a)(1)(v)	L.U. § 3-103 -- Development regulations element	Pages 91 - 94
(f) a sensitive areas element	L.U. § 3-102(a)(1)(vi)	L.U. § 3-104 -- Sensitive areas element	Pages 84 - 90
(g) a transportation element	L.U. § 3-102(a)(1)(vii)	L.U. § 3-105 -- Transportation element	Pages 42 - 48
(h) a water resources element	L.U. § 3-102(a)(1)(viii)	L.U. § 3-106 -- Water resources element	Pages 57 - 83
(i) a mineral resources element, IF current geological information is available	L.U. § 3-102(a)(2)	L.U. § 3-107 -- Mineral resources element	Pages 89 - 90
(j) for municipalities only, a municipal growth element	L.U. § 3-102(a)(3)	L.U. § 3-112 -- Municipal growth element	Pages 28 - 41
(k) for counties only if located on tidal waters, a fisheries element	L.U. § 3-102(a)(4)	L.U. § 3-113 -- Fisheries element	Not Applicable
Optional: (2) A comprehensive plan for a non-charter county or municipality **MAY** include: (a) a community renewal element; (b) a conservation element; (c) a flood control element (d) a housing element; (e) a natural resources element; (f) a pollution control element; (g) information concerning the general location and extent of public utilities; and (h) a priority preservation area (PPA) element	L.U. § 3-102(b)	L.U. § 3-102(b)(2)(i)	Optional Elements Not Included
(3) Visions -- A local jurisdiction SHALL through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	L.U. § 3-201(c)	L.U. § 1-201 -- The 12 Planning Visions	Included Throughout. See Introductory Comment Below
Optional: (4) Growth Tiers -- If the local jurisdictions has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the jurisdiction's comprehensive plan	L.U. § 1-509		Required But Not Included (See Planning's Introductory Comments, below)

As indicated in the above checklist, with the exception of the required Growth Tiers Map and associated text (L.U. § 1-509), the *Draft Plan* includes all required elements as identified in §3-102 (a) of the Land Use Article of the Maryland Annotated Code. Please see Planning's comments regarding the Growth Tiers issue within the *Introductory Comments* section below.

The Town should be aware the 2019 Maryland General Assembly passed HB1045 that requires all jurisdictions after June 1, 2020 to include a Housing Element in the jurisdiction's comprehensive plan. **Please note this is not a requirement at this time.** Planning will be developing guidance documents and other tools in the coming months to assist local governments prepare the required Housing Element in full compliance with HB1045. Since this update is being done before June 1, 2020, the requirement for a Housing Element will need to be addressed in the next update of the plan, which may occur up to 10 years after the adoption of this plan update. The Town should consider this as it prepares for its next update of the plan.

Maryland Department of Planning General Comments:

- Maryland's Planning Act of 1992, and subsequent legislation in 2000 and 2009, requires that the Twelve Visions (Visions) be included and implemented through the *Draft Plan*. The Town did an excellent job of incorporating the Visions into meaningful plan goals and objectives.

- Throughout the *Draft Plan*, Planning notes formatting inconsistencies between the various elements. For example, some elements open with an *Introduction*, while others do not; some elements contain policies, while others do not; and some elements contain goals and objectives, while others instead contain principles and priorities. The varying terminology proves difficult for the reader to comprehend the Plan's hierarchy for all these terms and the inconsistent formatting disrupts the flow of the document.
- The *Plan Purpose* section the *Draft Plan* states "[t]he Plan's recommendations, policies, goals, objectives, principles, and standards are to be carried out through these land use laws." Given this statement, Planning is concerned about a lack of clearly articulated recommendations for the various elements of the *Draft Plan*. The closest the *Draft Plan* comes to "recommendations" is in the *Implementation Element;* however, they are referred to as "implementation principles and strategies" and fall short of actual recommendations.
- The Plan does not provide a narrative of the Sustainable Growth & Agricultural Preservation Act of 2012 (SB236). The State Land Use Article (L.U. § 1-509) requires that, 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. The Town adopted an *SB236 Growth Tier Map* on December 5, 2012 (Resolution 09-2012) and Planning subsequently notified the Town that the State determined the Town's *SB236 Growth Tier Map* met State requirements. Given that the Town has adopted *a SB236 Growth Tier Map*, State law requires the map's inclusion within an update to the local comprehensive plan if the *SB236 Growth Tier Map* is to remain valid. While the Land Use Article does not prescribe which chapter the *SB236 Growth Tier Map* resides, most jurisdictions either place the map (and associated brief narrative of the Growth Tiers depicted on the map) within the *Land Use Element* or *Community Facilities Element*.
- The Town of Trappe appears to be within the boundary of the Stories of the Chesapeake Heritage Area. To be eligible for funding opportunities through the Maryland Heritage Areas Authority Program, the Town is required to incorporate the Heritage Areas Plan, by reference, in the Town's Comprehensive Plan.
- Planning respectfully suggests that the Town conduct a thorough proofing of the final *Draft Plan,* as several grammatical and typographical errors, and incomplete sentences were noted throughout the document (Example: Page 1, Vision 3: "[w]e work with Talbot County **to in** our role…). Planning further recommends that the *Draft Plan* utilize either Town Center or Village Center throughout the document instead of using both interchangeable. Since the *Draft Plan* emphasizes maintaining the "village character" of Trappe, presumably Village Center would be the preferred term.

Introduction:

- (Page 2) - Within the *Scope* section, the *Draft Plan* refers to a six-year Plan update instead of the ten-year update.
- (Page 3) - Within the *Planning Area* section, the Town indicates a 2019 planning area of 2,477 acres. In the Trappe 2010 Plan, the Town stated it had reduced its' Planning Area to 710 acres from the 2002 Plan as Lakeside and White Marsh had been annexed. However, in comparing the Planning Area of the 2010 Plan with the current *2019 Draft Plan*, the Planning Area boundaries are identical, thus revealing an acreage discrepancy between the two Plans, existing and draft, that needs to be clarified. It should also be noted there is an area within the North Annexation Area of the 2019 Trappe Planning Area that does not correspond to Talbot County's Planned Growth Area for the Town of Trappe. This area is designated as "Agriculture" and "Countryside Preservation" in the Talbot County Plan. Planning recommends the town communicate to the county its interest in annexing this area and collaborate on future land use designations.

Chapter 01: Background Element:

- (Page 5) - The first paragraph of the *Introduction* section states that, among other things, the *Background Element* provides statistical information about Town residents, current land use patterns, available public services and community facilities, and environmental constraints. However, it does not appear this information was included in this section. The 2010 Plan contains the referenced information and Planning suggests it is beneficial to add it into this 2019 version.
- (Pages 5-9) – The historical text is well written and provides excellent insight into how the Town grew and developed over the years.

Chapter 02: Goals and Objectives:

- Planning notes the *Goals and Objectives Element* is well-developed, however Planning recommends that this chapter's title include the word "Element" to be consistent with all other *Draft Plan* chapter titles.
- (Page 10) - The Land Use objectives are good as they propose an orderly, rational development of the Town and preserve local character and resources.
- (Page 12) - Planning recommends that technical assistance from federal and state agencies be added to the *Intergovernmental Cooperation* section in more descriptive ways, beyond simply "invite to attend meetings."

Chapter 03: Land Use Element:

- (Page 16) – The second paragraph references the 1997 Planning Act. This reference should be revised to reflect the 1992 Economic Growth, Resource Protection, and Planning Act.
- (Page 16) – In the *Existing Land Use* section, "Table 01" should be revised to Table 3-1, and it appears that Lakeside comprises 72 percent of vacant lands instead of 66 percent. It is also unclear what is meant by "[a]lthough most of the vacant land is classified as Agriculture by the Maryland Department of Assessments and Taxation, the classification as vacant is more consistent with the intended use."
- (Page 17) - Table 3-1 percentages do not total 100%. Planning recommends revising the "Other" land use category to 3.7%. In the *Land Use Changes in the Town since the 2010 Comprehensive Plan* section, many of the changes discussed occurred prior to 2010 and were included as changes in the 2010 update. The Town may want to revise this section to only include land use changes since 2010.
- (Page 18) - Consider noting in the legend of Map 3-1 (Existing Land Use 2015) that the "Vacant" Land Use classification includes agriculture, since "Agriculture" is classified on Map 3-2 (Land Use Plan). Also, the Existing Land Uses in the text, in the table on Map 3-1, and in the legend of Map 3-1, do not match. For example, "Institutional" is in the text and in the legend, but not in the table. Likewise, "Semi-Public" is in the table, but not in the text and not in the legend. Additionally, the table land use percentages do not total 100%.
- It is difficult to assess the proposed land use changes between Map 3-1 and 3-2, due to differences in land use classification schemes used for each. In addition, the text in this section is confusing as it fluctuates between land use and zoning discussions, many of which have the same or similar names, making it difficult to ascertain which is which. Planning recognizes the challenge in presenting the information consistently, given the innovative, flexible zoning mechanisms that apply to many of the future land use areas. However, to improve readability, please consider the following revisions:
    - Clarify which of the land use districts described on pages 22-26 correspond to each of the proposed classifications on Map 3-2. Currently, it is hard to understand the difference between Mixed Use, Regional Commercial, and Planned Employment.

- Please ensure all legend items are defined in the text [e.g. Neighborhood Center, Highway Corridor, Planned Employment, Green Infrastructure (county), and Mixed Use].
- Rename the "Potential Growth Area" classification on Map 3-2 to "Potential Annexation Areas" based on text references on page 26.
- Revise color scheme to distinguish between the various green and blue land use designations in Map 3-2 (Neighborhood Conservation, Greenway, Agriculture, and Greenbelt, and Green infrastructure) and the water bodies. The existing colors are particularly difficult to see underneath the "potential growth area" hatching.
- Eliminate the purple arcs and the green lines from the county area of the map or, if relevant, identify these features within the map legend.
- Agriculture land use is not described or addressed in the text and the last paragraph on page 27 refers to portions of a large farm on the Town's western border within the planning area that should remain in agricultural use. It would be helpful to know more about the location of this parcel and how it fits into the Land Use Plan.

- (Pages 22-26) - Overall, the discussion of Land Use Districts is very thorough. Consider elaborating on some of the different residential buildings that may be found in the future land use districts to show how these areas would: 1) accommodate an aging population as discussed on page 36, and 2) provide a mix of residential units (including workforce housing) as envisioned on page 10.
- (Page 26) – Planning acknowledges the Town's vision for a new greenway system that will integrate both Town and County conservation efforts. In addition to connecting forested areas to allow wildlife movement, the greenbelt coincides with Talbot County's Priority Preservation Area.

<u>Chapter 04: Municipal Growth Element:</u>

- (Pages 29-30) - Planning commends the Town's efforts on revitalization of the existing downtown by permitting small-scale commercial development, as well as the identification of additional infill areas. The Town may want to consider a separate map highlighting the newly annexed areas and additional infill areas, as these areas are referenced multiple times throughout the document.
- (Pages 30-31) - The Town has completed a development capacity analysis on vacant lots and other parcels with subdivision potential. The analysis identified 116 developable lots for which sewer capacity will be reserved, which supports the Town's effort to "encourage context appropriate infill and redevelopment that adds value to the community" (p. 20). In addition to counting potential new lots, consider clarifying the potential commercial floor area and number of dwelling units that would be supported by the land use or zoning designations for these areas, and presenting this information as a table.
- As noted, the capacity analysis does not cover all areas of the Town due to difficulties in analyzing build-out potential in flexible zones. It would be helpful to gain an understanding of the maximum buildout capacity (new commercial floor area and dwelling units) for the entire Town and the potential annexation area. For flexible zones, consider estimating capacity based on the maximum density/intensity zoning scenario and associated design requirements.
- (Pages 30-31) – The title of Table 4-2 duplicates the word "projection", and the title for Table 4-2 is repeated on page 31 and should be removed.
- (Page 32) – The *Annexation Plan* section states that the Trappe Planned Annexation Areas are consistent with the Trappe Growth Area outlined in the 2016 Talbot County Comprehensive Plan; however, this is not entirely accurate. A portion of the North Annexation Area is shown as "Agriculture" and "Countryside Preservation" Land Uses in the Talbot County Plan. This section also incorrectly states the 2017 Talbot County Plan, instead of 2016.

- (Pages 32-34) - Planning has concerns about the *Annexation Plan* section of the Municipal Growth Element and Map 4-1 (Annexation Plan). The *Municipal Growth Element* provides narrative and data analysis regarding two "Growth Scenarios" for infill development. Additionally, the *Annexation Plan* text of the *Draft Plan* states "[a]s a result of the recent annexations within its growth area, Trappe does not have an immediate need for large areas of developable land. The Town has sufficient infill property within its boundaries to accommodate growth and does not anticipate any additional annexations of any significant size for development within the planning period." However, Map 4-1 (Annexation Plan) depicts large planned annexation areas and the "*Annexation Plan*" narrative provides three Annexation Policies, presumably for the planned annexation areas shown on Map 4-1. There appears to be a significant dichotomy between the narrative and analysis within the *Municipal Growth Element* with respect to growth outside of the current municipal limits. In several instances, the *Draft Plan* indicates that municipal growth, beyond current Town limits, is not contemplated by the Town. However, elsewhere in the *Draft Plan* it appears that the "annexation policies" specifically apply to the mapped "Planned Annexation Areas".
- (Pages 35-37) - The 2016 enrollment of 772 over 903 State Rated Capacity calculates to ~85% capacity, not 80%. Additionally, the Town should utilize a more recent version of Talbot County's Educational Facility Master Plan (2018 or 2019) for school enrollment projections.
- (Page 38) - The *Draft Plan* refers to a State goal of 30 acres of parkland per 1,000 people. This standard is no longer operative. The *Draft Plan* instead should discuss whether the Town's parks and recreation needs are being met according to the analyses and proposed future projects discussed in the Talbot County 2017 Land Preservation, Parks and Recreation Plan.
- (Page 41) - The text for *Rural Buffers and Transitional Areas*, in referring to the greenbelts, says that "[t]wo agricultural parcels, totaling 300 acres, extend to the west side of Town, have agricultural district status. An additional 2,200 acres are also in agricultural districts." Planning notes that Districts provide only temporary preservation. If possible, the *Draft Plan* should describe how the Town will work with the County to permanently preserve this acreage. Further, the Town should be aware that the Maryland Agricultural Land Preservation Foundation website states, "Land that lies within the boundaries of a 10-year water and sewer service area plan is generally not eligible for the program unless it has extraordinary productive capability and is of significant size."

Chapter 05: Transportation Element:

- (Pages 46 and 47) – Planning notes that the *Roadway Inventory* and *Level of Service* sections that were included in the 2010 Plan have been removed from this *2019 Draft Plan*. It is unclear why these informative sections were removed; but in their absence, Planning recommends that, at a minimum, the Level of Service C category be described as most of the roadways in and around Trappe function at this level.
- Planning is pleased to note that the *2019 Draft Plan* continues to support pedestrian and bicycle connectivity and improvements. Planning encourages the Town to work with Talbot County and the Maryland Department of Transportation (MDOT) to explore state pedestrian and bicycle funding opportunities for planned improvements. MDOT posts state pedestrian and bicycle funding programs at this link: http://www.mdot.maryland.gov/newMDOT/Planning/Bike_Walk/index.html
- Delmarva Community Transit provides a couple of deviated transit routes serving the Trappe area: https://www.dcsdct.org/uploads/2/5/0/4/25044487/finalmustschedulenov2014.pdf. The *2019 Draft Plan* should include existing transit service information and address the adequacy of the transit service and any improvement needs.
- Planning notes that the proposed northern (north of Backtown Road) and middle (at Backtown Road) overpass locations on US 50 are either outside of a Priority Funding Areas (PFA) or in PFA Comment Areas (locally designated PFAs not meeting the PFA criteria defined by the PFA

law). In general, building new interchanges outside planned growth areas may have adverse land use impacts. The Maryland PFA law prohibits the State from funding major transportation improvement projects outside of PFAs unless certain exceptions are approved. Planning encourages the Town to continue working with MDOT SHA to reevaluate the need for proposing new interchanges at these two locations and explore other options to address the safe connectivity between both sides of US 50 while avoiding or minimizing potential adverse land use impacts.

- (Page 47) – Map 5-1 (Transportation Plan) is difficult to effectively utilize at the scale provided. It might prove beneficial to eliminate some of the surrounding County area to enlarge the municipal boundary and growth area to better convey the existing streets and planned improvements. It would also be helpful to remove the purple arcs from the map, improve the corporate boundary line so it is clearly visible, and either remove or enlarge the inset map in the legend as it is not readable at its' current scale.
- (Page 48) – Map 5-2 (Existing and Planned Pedestrian and Bike System) is also hard to utilize at the scale provided. As previously stated, it might prove beneficial to eliminate some of the surrounding County area to enlarge the municipal boundary and growth area to better convey the proposed greenway and pedestrian/bike system. It would also be helpful to remove the purple arcs from the map, improve the corporate boundary line so it is clearly visible, and explain what is meant by "Activity Centers".

<u>Chapter 6: Community Facilities:</u>

- (Page 49) – This is one of the Chapters that does not contain an *Introduction* section and does not include "Element" in the Chapter title, as do several of the other sections.
- (Page 52) – The text on Map 6-1 (Community Facilities) is difficult to read. Planning recommends the Town revise this map so that the labels can be read in relation to the location of the facility.
- (Pages 54 -55) – The *Community Recreation* section mentions that the Town contains three Town parks and two County parks. In addition, "[t]he Town, via a Development Rights and Responsibilities Agreement, will receive a large public park on the east side of US 50. The PUD plan for the Lakeside District includes a large lake within the project that supports non-motorized craft…. New developments will be required to provide parks and park facilities to meet the recreational needs of its residents." Though these parks and recreation facilities seem ample, the Town should consider working with the County to include a proximity analysis for Trappe in the next LPPRP. This analysis will more precisely indicate whether new facilities are needed to serve residents in some parts of Town.
- (Page 55) – In the *Cultural* section, it would be beneficial to expand on the nature of the Rural Life Museum, what is housed in the museum, and how it contributes to heritage tourism opportunities for Trappe (i.e., number of annual visitors, promotional events, ties with Heritage Areas).

<u>Chapter 7: Water Resources Element (WRE):</u>

- The *Water Resources Element* (WRE) considers environmental sustainability in its goals and discussions about future water and sewer systems planning. The WRE *Introduction* explains that the purpose of the element is to "ensure any future development plans within the Town of Trappe takes[sic] into account and is sensitive to the local water resources." The WRE appropriately uses the two growth scenarios outlined in the *Municipal Growth Element* as the basis for Trappe's water resource future planning estimates. The WRE also acknowledges that the Upper and Lower Choptank River watersheds, which are the receiving waters for the Town's wastewater, are impaired and that an increased demand for water and sewer as well as conversion of land uses within the Town will result in increased stormwater discharge. The *Draft Plan* WRE effectively evaluates how Trappe will accommodate current demand for water resources and the two growth

scenarios, and it assesses and accounts for the impact that planned land use acreages will have on non-point source loading and stormwater runoff. The following points from the WRE demonstrate its effectiveness and compliance with the 2006 legislative amendments to what is now the Land Use Article:

Water Supply System

- Trappe's existing water supply system comprises two wells in the Piney Point Aquifer, a backup generator that serves both wells, one elevated 250,000-gallon water storage tank, and chlorination water treatment; water supply system administrative components include Water Appropriation Permit TA1979G006(04), water capacity fee, water connection charges, water meters with monthly automated readings, basic monthly water service availability fee, and an additional monthly water usage rate. Trappe has utilized the metered billing as well as water conservation articles published in the Town's monthly newsletter to attempt to reduce water demand.
- To accommodate future water supply demand, Trappe will expand its service area and is planning installation of a permitted new Piney Point Aquifer well. Trappe is utilizing the water planning classification system adopted by the Maryland Department of the Environment (COMAR 26.03.01.04) to categorize service areas ranging from existing service to no planned service.
- The two growth scenarios (population and housing growth scenarios based on a moderate [scenario 01] and more accelerated [scenario 02] growth rate) described in the *Municipal Growth Element* can be accommodated within the Town's existing water appropriations permit limit of 347,500 gallons average daily withdrawal, as demonstrated in Table 7-3.
- The WRE also explains how the Town's future development areas, including Lakeside PN District and White Marsh Development Area, will obtain water service. Future water service in these areas involves a combination of developer-funded connection to the Town's existing system (Lakeside PN District and White Marsh Development Area), and design and construction of a water treatment, storage, and distribution system (Lakeside PN District) to be connected to the Trappe system via looping.

Sewer System

- Trappe's existing sewer system comprises a wastewater treatment plant (WWTP) which discharges treated effluent to LaTrappe Creek of the Lower Choptank Watershed via an unnamed tributary of LaTrappe Creek (Total Maximum Daily Loads are set for the discharges by the National Pollutant Discharge Elimination System [NPDES] permit); long-term storage of biosolids in the middle lagoon; biosolids slow-treatment by natural bacterial decomposition (requires removal approximately every 10 years); emergency storage in a portion of the middle lagoon and in the north lagoon (the southern lagoon no longer exists); permit limitation of 200,000 gallons average daily flow, and design capacity of 200,000 gallons per day of domestic wastewater and 277 gallons per minute/400,000 gallons per day peak flow capacity.
- Committed future sewer capacity includes 115 infill properties and White Marsh Elementary School growth.
- Remaining excess sewer capacity (81,250 gallons per day) will be reserved for infill areas within the existing municipal boundary, properties with septic systems if they pay all extension and connection fees, and planning purposes.
- Trappe implemented a water reuse program and replaced the WWTP chlorine induction unit in 2009 and subsequently reduced potable water flow from wells by 30,000 gallons per day.

- Trappe has also been working to reduce sewer system infiltration and inflow during the past five years.
- Trappe is utilizing the sewer planning classification system adopted by the Maryland Department of the Environment (COMAR 26.03.01.04) to categorize service areas ranging from existing service to no planned service.
- Both growth scenarios could be accommodated by the existing sewer system according to Table 7-9.
- The WRE acknowledges that any significant development in the annexation areas cannot be accommodated by the current system and would require upgrades to the WWTP, which would be limited by the Tributary Strategy point source cap and TMDLs.
- Potential development areas within the Old Town boundary are located within the existing sewer system service area.
- Sewer service for the 32 town-perimeter properties with septic systems would be allocated on a first-come, first-serve basis and property owners would pay extension and connections fees.
- The WRE also explains how the Town's future development areas will obtain sewer service. Future sewer service in the Lakeside PN District will be provided by a WWTP designed and constructed by the developer to meet the required capacity; permits have already been obtained for the first phase of the WWTP and the discharge application via land application. Regarding the White Marsh Development Area, the developer will finance any needed improvements to the Trappe sewer system and the developer or property owners will finance any necessary improvements for extension of service, including WWTP upgrades. The Trappe WWTP current capacity cannot accommodate the White Marsh Development growth so upgrades will be required.
- The Trappe WWTP will not meet or exceed the total nitrogen (TN) point source cap until 2035 under either growth scenario, and when stream discharges approach 0.2 million of gallons per day (mgd) then Trappe may have to upgrade the WWTP; phosphorus levels will remain below the point source cap under either growth scenario.
- Since both of the Trappe watersheds (Upper Choptank River and Lower Choptank River watersheds) are impaired, the assimilative capacity is limited, and Trappe is aware that future land use needs to limit pollutant transport to receiving waters.
- Tables 7-12 through 7-14 utilize MDE's Nutrient Load Analysis Spreadsheet to evaluate the change in non-point source loading associated with the two growth scenarios; spreadsheet input fields include growth scenario metrics for land use acreages, number of residential septic systems, acreage of non-residential land served by septic systems, and percent of impervious surface by land use and by watershed.
- Trappe's most significant contribution to protecting water quality would be from ensuring that TN and phosphorus remain below their respective caps/TMDLs.

<u>Stormwater Management</u>

- Trappe adopted a version of the State's Model Stormwater Management Ordinance in 2009, requiring Environmental Site Design to implement measures to mimic natural hydrologic runoff characteristics and minimize the impact of land development on water resources.

Planning's Suggestions for Improvement to the WRE:

- It appears that the growth scenarios presented in the *Municipal Growth Element* (MGE) are limited to residential growth, but the WRE projected water and sewer demand tables (Tables 7-3 and 7-9) for growth scenarios 01 and 02 include projected nonresidential demand. Planning recommends noting in the MGE that nonresidential projected growth is not included but is discussed in the WRE; or including the nonresidential growth in the MGE to connect the two chapters.
- The MGE or WRE should be clarified by breaking down which areas are included in the nonresidential demand projections.
- (Page 65) – There is a typo in the sentence prior to Table 7-1 ["summarized in (See Table 7-1)"].
- (Page 67) – The first paragraph mentions 5 wells in the Piney Point Formation, but only 2 existing wells and 1 planned well are previously mentioned in the WRE (page 65).
- (Page 67) - What are the buildout demand estimates for water for the Lakeside PN District and the White Marsh Development Area? Are these included in Table 7-3? This should be clarified.
- (Page 68) - Map 7-2 (Planned Sewer Service) indicates planned water service for areas outside of the municipal boundary (growth/annexation areas), while areas within the corporate boundary show "no planned service", contrary to the Town's goal of accommodating infill in lieu of new development.
- (Pages 69 and 76) - Why is the 41-acre vacant property annexed in 2008 and available for industrial uses not included in the future water and sewer planning?
- (Page 69) – The Matawan Aquifer wells are mentioned for the first and only time in the Trappe Comprehensive Plan on page 69; details about these wells are not provided in the *Draft Plan*. How many wells are there and what are the metrics and permit information?
- (Page 74-78) - The WRE *Sewer System* section describes that sewer service is reserved for infill development within the Trappe municipal boundary. Is water service also reserved for this infill development?
- (Pages 74-75) - Table 7-9, typo: "Projected Water Demand" should read "Projected Sewer Demand".
- (Page 75) - What are the buildout demand estimates for sewer for the Lakeside PN District and the White Marsh Development Area? Are these included in Table 7-9? This should be clarified.
- It appears that buildout demand estimates for water (partial) and sewer were conducted for the Lakeside PN District; however, it is unclear whether there will be enough remaining water capacity from the Piney Point wells to cover the required balance. In addition, the projected water demand section regarding the Lakeside PN District is unclear regarding the total buildout demand estimate for water (i.e., the initial phase of development is 200 units and will be served by the existing system, but what will water demand be after subsequent phases of development and how much allocation beyond the 300,500 gallons per day will be required?) The Town should clarify whether the buildout demand estimate for sewer will be the same for water (i.e., 540,000 gallons per day).
- (Page 75) - Are the 32 town-perimeter properties with septic systems described on this page included in the growth scenarios in the *Municipal Growth Element* and in Table 7-9? In addition, the WRE should evaluate how nutrient trading could be utilized when connecting these septic properties to the sewer system to earn credits to increase the overall WWTP discharge.
- (Page 75) - Are the undeveloped parcels described on this page included in the growth scenarios in the *Municipal Growth Element* and in Table 7-9?
- (Pages 67 and 75) – Generally, buildout demand for water should be as much as buildout demand for sewer. The *Draft Plan* indicates that buildout demand for sewer for the Lakeside PN District

will be 540,000 gallons per day; therefore, buildout demand for water for the Lakeside PN District should be at least 540,000 gallons per day. Based on a review of the remaining well water capacity described in Table 7-3 (221,008 or 91,008 gallons per day), then it appears that there is not enough remaining well water capacity to accommodate the Lakeside PN District buildout demand estimate for water. If the Lakeside PN District is included in the projected residential demand in Tables 7-3 and 7-9, this should be clarified.

- (Page 76) – Map 7-2 (Planned Sewer Service) indicates planned sewer service for areas outside of the municipal boundary (growth/annexation areas), while areas within the corporate boundary show "no planned service", contrary to the Town's goal of accommodating infill in lieu of new development. In addition, it does not appear that there are any S-4 areas planned. Should there be an explanation in the text why there are none planned? The legend should have colored asterisks for existing and future WWTPs as indicated on the map.
- Planning recommends that a buildout demand estimate for water and sewer be completed for the White Marsh Development Area when the development plan is prepared, and a comprehensive plan amendment drafted.
- (Page 78) - The options for sewer service and sewage disposal for the White Marsh Development Area should be discussed since Trappe's existing WWTP has insufficient capacity to serve the proposed development. For example, upgrading to an Enhanced Nutrient Removal (ENR) or Biological Nutrient Removal plant design and/or utilizing nutrient trading for the 32 septic properties that may connect to the sewer system could significantly reduce discharges and facilitate the required capacity.
- According to Maryland's Phase III Watershed Implementation Plan, the Trappe WWTP is scheduled to be upgraded to an ENR facility by 2025, which will significantly reduce total nitrogen discharges. This information should be added to the WRE.
- Planning further suggests clarifying the connections between the buildout demand estimates and the actual water and sewer needs for the Lakeside PN District and the White Marsh Development Area. For example, compare the buildout demand estimate for water for the Lakeside PN District to the allocation from the Matawan wells and the remaining capacity from the Piney Point wells and evaluate how to correct any deficits.
- (Page 79) - How does Trappe plan to direct future land use to limit pollutant transport to receiving waters?
- (Page 82) - The last sentence of the paragraph is confusing. Perhaps it should read as follows: "Put another way, Trappe can make its most significant contribution to achieving Federal and State water quality objectives by ensuring that TN discharge from the WWTP remains below the cap set for insignificant plants in the Tributary Strategy and that phosphorus discharge from the WWTP remains below the TMDL set for the unnamed tributary to LaTrappe Creek."

Chapter 08: Natural Resources and Sensitive Areas Element:

- This is one of the Chapters that does not include "Element" in the Chapter title. This should be consistent throughout the document.
- (Page 86) – Map 8-1 (Sensitive Areas) is difficult to interpret. The corporate boundary is hard to see, as are the streams and stream buffers. A larger scale map that focuses on the corporate boundary and associated planning area may better depict these important sensitive areas.
- (Page 88) – The *Wetlands* section refers to Figure 8-2 referencing non-tidal wetlands, but Figure 8-2 was not included in the *Draft Plan*.
- (Page 89-90) – The *Minerals Resources Element* is included within this Chapter. The *Draft Plan* states there is a surface mine within the corporate boundary of Trappe and that it is located as shown on Figure 4, however Figure 4 was not provided in the *Draft Plan*.

Chapter 09: Implementation:

- Planning commends the Town on the variety of methods listed to implement the *Draft Plan*. However, it would have been beneficial if the *Draft Plan* included specific recommendations within each of the Chapters/Elements, or within this final *Implementation Element*. While the stated implementation principles and strategies are good, many of them are so general in nature that they could apply to any jurisdiction. The *Draft Plan* could have been greatly strengthened by including specific recommendations based upon the goals and objectives detailed in each of the Chapters.

Maryland Department of Planning Review Comments August 30, 2019
2019 Draft Town of Trappe 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 2019 Draft Town of Trappe 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 Town in a timely manner.

Attachments

Maryland Department of the Environment

Maryland Department of Housing and Community Development

Maryland Historical Trust

Maryland Department of Transportation

Maryland Department of Natural Resources

Maryland
Department of
the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

August 7, 2019

Ms. Tracey Gordy
Maryland Department of Planning
301 West Preston Street
Suite 1101
Baltimore, MD 21201

RE: Local Plan Review: Town of Trappe Comprehensive Plan 2019
MD20190708-0566

Dear Ms. Gordy:

The Maryland Department of the Environment (MDE) received the above-referenced local plan review. Below is the Department's recommendations. Our response code is R1; Generally Consistent with Qualifying Comments: It is generally Consistent with our plans, programs and objectives, but the attached qualifying comment is submitted for consideration.

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.

2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.

3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.

4. The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.

5. Any contract specifying "lead paint abatement" must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built

before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.

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

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

8. Water and Sewer Projects should be included in the Talbot County Comprehensive Water and Sewerage Plan (CWSP), and when a project is completed, should be reflected as completed in the Plan. The CWSP was amended to include the proposed well to the Table 10 (Trappe Water System Capital Improvement Projects, of the CWSP. On page 66 of the Trappe Plan, the Town has provided information regarding the planned well. Please work with the County to incorporate any new or updated information into the Town section of the County Plan once the well project is completed.

If you have any questions regarding the Department's recommendations please call me at (410)537-4120 or at amanda.redmiles@maryland.gov.

Sincerely,

Amanda Redmiles

Amanda Redmiles
Clearinghouse Coordinator
Office of Communications

DHCD
Maryland Department of Housing
and Community Development

LARRY HOGAN
Governor

BOYD K. RUTHERFORD
Lt. Governor

KENNETH C. HOLT
Secretary

July 29, 2019

Mr. Joseph Griffiths
Manager of Local Assistance and Training
Maryland Department of Planning
301 West Preston Street, 11th floor
Baltimore, MD 21201

Dear Mr. Griffiths:

Thank you for the opportunity to review the Town of Trappe Comprehensive Plan Proposed Amendment (the Plan). The comments below are based on a review of the Plan by staff in DHCD's Division of Neighborhood Revitalization.

- The Plan mentions the potential for residential and commercial infill development. This strategy is consistent with the Town's sustainable community plan and can be supported by DHCD's housing and community development programs.
- Although the Town of Trappe is designated as a sustainable community, this is not mentioned in the Plan.
- There are no separate housing or community development sections in the Plan, even though housing accounts for a majority of the Town's land use. The Town should consider adding these elements. An economic development section should address the need for workforce and small business development, consistent with the Sustainable Community Action Plan. Note that while it is not currently a requirement, a housing element will be required in future comprehensive plans per House Bill 1045, passed in the 2019 session of the Maryland General Assembly.

Again, thank you for the opportunity to comment on the Town of Trappe Comprehensive. If you have any questions regarding our comments, please call me at 410-209-5807.

Sincerely,

John Papagni
Program Officer
Division of Neighborhood Revitalization

MARYLAND DEPARTMENT OF
PLANNING
MARYLAND HISTORICAL TRUST

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary

August 5, 2019

Mr. Keith Lackie
Regional Planner
Maryland Department of Planning
Lower Eastern Shore Regional Office
201 Baptist Street, Suite 24
Salisbury, MD 21801

Dear Mr. Lackie:

Thank you for the opportunity to review the Town of Trappe Draft Comprehensive Plan and submit comments on behalf of the Maryland Historical Trust.

The plan is silent regarding the Trappe Historic District (T-946) which was determined eligible for placement on the National Register of Historic Places in 1997. The NR-Eligibility Review Form provides background research that might compliment the stated plan purpose on page 1 of "preserving the natural and traditional village settings so central to its character".

The history section chronicling the town's growth patterns beginning on Page 6 provides a good and valuable introduction to the comprehensive plan. Consider adding information to bolster and broaden this discussion by including text from the statement of significance in the NR Eligibility form, which can be found in MEDUSA, Maryland's Cultural Resource Information System https://mht.maryland.gov/secure/medusa/

There are a few places in the plan that touch on historic character or significance, such as referencing "architectural timelessness" on page 9, "maintaining the core of the Town on page 10, encouraging individual property owners to preserve and enhance the historical integrity of their homes and buildings" on page 13, and identifying the Village Center as the historical town center of a crossroads village on page 20. However, there are no mechanisms or programs mentioned in the plan that support these visions, goals and objectives.

The discussion of past growth patterns in the Town from 1930 to 2010 was particularly relevant to current conditions of land use as well as interesting to the reader.

The discussion of infill and redevelopment on page 92 might consider the creation of architectural guidelines to complement existing historic architecture. If assistance is desired, please contact either myself or Heather Barrett in the Office of Research, Survey and Registration at heather.barrett@maryland.gov or (410) 697-9536 for more information.

Thank you again for the opportunity to comment on the Town of Trappe Draft Comprehensive Plan. If you have any questions, please contact me at (410) 697-9561 or steven.allan@maryland.gov

Sincerely,

Steven H. Allan, AICP
Local Assistance and Training
Office of Planning, Education and Outreach

Cc Nell Ziehl, Chief, Office of Planning, Education and Outreach
Joseph Griffiths, MDP
Oumy Kande, MDP

MARYLAND DEPARTMENT
OF TRANSPORTATION

Larry Hogan
Governor
Boyd K. Rutherford
Lt. Governor
Pete K. Rahn
Secretary

July 26, 2019

Mr. Keith Lackie
Eastern Shore Regional Planner
Maryland Department of Planning
301 West Preston Street, Suite 1101
Baltimore MD 21201

Dear Mr. Lackie,

Thank you for coordinating the State of Maryland's comments on the 2019 Town of Trappe Comprehensive Plan, hereafter referred to as "the Plan." The Maryland Department of Transportation (MDOT) offers the following comments.

General Comments:

- Please replace all "State Highway Administration" references with either "Maryland Department of Transportation State Highway Administration or, "MDOT SHA"

- The MDOT SHA fiscally unconstrained Highway Needs Inventory (HNI) includes projects that are critical to Maryland's transportation needs. The US 50 corridor, MD 322 south of Easton to the Choptank River Bridge, is included for access control improvements. This vision is supported in the plan with a call for limited curb cuts and frontage roads on US 50.

- Any future development or re-development of properties adjoining State roads or proposals for new access points to State roads will require a MDOT SHA access permit and may require a traffic impact study and traffic impact mitigation improvements. Please coordinate access and other improvements with MDOT SHA in conjunction with any future annexations.

- The MDOT SHA is currently working on a Safe Routes to School sidewalk project along MD 565, from Homerun Baker Park to White Marsh Elementary School. The project is currently being evaluated for stormwater management and right-of-way needs.

- The MDOT SHA Fund 79 "Sidewalk Retrofit" is an opportunity to implement the proposed sidewalk and bicycle improvements mentioned. Also, additional clarification on where sidewalks are recommended could be helpful when referencing said locations.

Transportation Comments:

- Transportation, Page 42 – Safety should be a priority for all roadway types within and outside of a neighborhood. MDOT recommends modifying the second bullet to reflect the need for safety in general, not just at high speeds outside of neighborhoods and urban areas.

- Transportation, Page 42 – The Town of Trappe is served by public transportation by Delmarva Community Transit. Please consider noting this in this Chapter.

- Transportation, Page 44 – Since there is a plan to have a policy in place to achieve less reliance on driving alone, please be aware that MDOT's Commuter Choice Maryland is a Travel Demand Management program that promotes alternatives to driving alone such as Transit, Ridesharing (Carpool & Vanpool), telework, Alternative work schedules, and Guaranteed Ride Home. Please visit CommuterChoiceMaryland.com for more information on this topic.

- Transportation, Page 44 – One of the bullets states that, "Streets should be as narrow as possible". Does the Town plan to establish a standard minimum street width based on street typology? Please consider having all roadways meet national guides and standards.

- Transportation, Page 44 – One of the bullets states that, "we should avoid development that would result in an unacceptable level of service on roads and intersections serving a development." For new proposed developments that result in a Level of Service that is not acceptable, will traffic mitigation be an option to help offset this impact on roads?

- Transportation, Page 45 – The Town of Trappe should continue to coordinate with MDOT SHA on the feasibility and need of one or more overpasses over US 50.

Thank you again for the opportunity to review the Plan. If you have any questions or concerns, please do not hesitate to contact Mr. Ian Beam, MDOT OPCP Regional Planner, at 410-865-1280, toll free at 888-713-1414 or via email at ibeam@mdot.maryland.gov. He will be happy to assist you.

Sincerely,

Albert N. Turner,
Assistant Director, OPCP, MDOT

for Heather Murphy
Director, Office of Planning and Capital Programming (OPCP), MDOT

cc: Mr. Ian Beam, Regional Planner, OPCP, MDOT

bcc: Mr. Ben Allen, Assistant Regional Planner, MDOT SHA
Mr. Tyson Byrne, Manager, Regional Planning, MDOT OPCP
Mr. Jason Kepple, Regional Planner, MDOT MTA
Ms. Gladys Hurwitz, Transportation Planner, MDOT OPCP
Mr. Jay Meredith, District Engineer, District 1, MDOT SHA
Mr. Stephen Miller, Regional Planner, MDOT SHA
Mr. Peter Sotherland, Bike/Pedestrian Coordinator, MDOT SHA
Ms. Colleen Turner, Assistant Director, MDOT OPCP

MARYLAND
DEPARTMENT OF
NATURAL RESOURCES

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor
Jeannie Haddaway-Riccio, Secretary

August 12, 2049

Ms. Tracey Gordy
Maryland Department of Planning
Lower Eastern Shore Regional Office
201 Baptist Street, Suite 24
Salisbury, MD 21801

Dear Ms. Gordy,

On behalf of the Department of Natural Resources, thank you for offering an opportunity to comment on the Trappe Comprehensive Plan. As development pressure increases and irreplaceable resource lands are lost, it is vital that Maryland grows smarter and more sustainably through a collaborative and informed public planning process. The plan includes many strong goals and objectives for the referenced area. DNR offers below a series of comments on the draft Plan for your consideration:

Pg. 12 and 13: DNR commends the Town on the inclusion of strong goals to protect the local landscape, the Chesapeake Bay and to use establish a greenway surrounding the Town.

P. 26: The Town vision for the Greenway system is a good example of the multi-benefit of green infrastructure for ecosystem services as well as social benefit.

Pg 84: The location and physical characteristics of natural features such as streams, soils, wetlands, forests, and significant tree stands, and sensitive fish and wildlife habitats should inform management practices, for example limiting clearing of forest cover or requiring expanded stream buffers. Natural resource features of concern are not just those located in the corporate area but those outside the Town limits that are potentially at risk as a result of activities that take place in the Town. Accordingly, the Town should do all it can to balance its urban growth with the need to preserve natural resources, trees, water areas, etc., protect sensitive environmental areas, manage run-off to minimize damage to water quality and mitigate any negative impacts on land, air, water vegetation, and energy.

Pg. 89: The Town of Trappe will continue to encourage the creation of a "Greenbelt" of protected farmland surrounding the Trappe Development Area (see Map 3-2). Trappe has amended its development area to not encroach upon areas southwest of town that are in active agriculture use and considering preservation opportunities. The goal is to create a preservation barrier that encircles and defines the planning area in the future.

We commend the Town's thoughtful evaluation of the importance of Natural Resources both within and outside of the Town's boundaries. We support the plan to develop a greenbelt around the town to maintain agricultural

land and would encourage planting forests where practicable to increase the rural character of the Town and its surrounding landscape, as rural lands are positively associated with productive fisheries.

While the town of Trappe represents just a small footprint in the larger Choptank watershed, we would encourage the town to limit the development of rural land and minimize the impervious surface footprint. The remaining best fisheries habitats are found in rural landscapes dominated by agricultural and forested land uses. The Choptank River, dominated by agriculture, remains a viably important habitat to fish, particularly Striped Bass. The Upper tidal Choptank River is legally demarcated as a Striped Bass spawning ground. Maintaining and enhancing the rural character of the watershed is key in promoting healthy spawning habitat for Striped Bass.

The Department of Natural Resources (DNR) Fishing and Boating Services Unit has studied the impacts of development on Fisheries. Our studies indicate that increased development in a watershed is associated with stressors that limit healthy fish habitat. Habitat conditions that favor tidal fisheries are maintained in rural watersheds where impervious surface is less than 5% (0-0.37 units per hectare). In watersheds with 5-10% (0.37-0.86 units per hectare) impervious cover, habitat begins to decline, requiring more aggressive management of fisheries to compensate for habitat losses. Fisheries management options are limited in watersheds when impervious cover is greater than 10% (> 0.86 units per hectare). While there are many restoration options that can be applied to restore streams and stream habitat, we have no current data to suggest they effectively restore tidal fisheries habitat to support recovery of lost functions essential to supporting healthy fisheries. Therefore to date, the most successful strategy to maintain healthy fisheries is to maintain the rural character (farms and forests) of watersheds.

Given the relationship between increased development in a watershed and declines in ecological function, we recommend the Town work with the County to project future impervious cover by watershed at build out. (We have developed an approach to do this and would be glad to assist the county if needed.) This will allow assessment of future habitat conditions and can be applied to reinforce the need to concentrate growth away from rural landscapes and limit present sprawl development in these areas. This is consistent with the Town's commitment to protecting sensitive environmental areas (in this case, key spawning habitat in the Choptank River).

We also would promote aggressive management of the streams and their buffers, particularly the Miles Creek headwaters which flows into the Choptank just above the lower boundary of the Striped Bass spawning habitat. Maintaining habitat connectivity throughout the watershed is important to maintain good water quality that supports the growth and survival of larval and juvenile fish.

The best protection of headwater streams is to enhance and conserve riparian buffers while maintaining adjacent lands in naturalized states. Therefore, we reiterate our support of the Greenbelt around the town and would encourage the town to work with the County to promote the conservation of the land's rural character.

The Plan would be strengthened by identifying areas vulnerable to storm surge and chronic flooding. natural systems to protect or buffer these areas as well as strategies to protect these areas.

Pg 93 & 4: DNR commends the Town on the strong language for objectives to protect Sensitive Areas as well as

the goals of interconnected public parks and spaces. Maryland's Project Green Classrooms is a collaborative group with governmental and non-governmental advocates promoting the increased connections for Marylanders to get outside. These series of connected parks and space would be a great example of "nearby nature" that has numerous health benefits and promotes a bond and future stewards of our natural resources.

On behalf of the Department, I would like to thank you for the opportunity to review the plan. DNR looks forward to working with you on many of the implementation measures over the coming years. If you should have any questions about these comments or would like further information, please do not hesitate to contact me at 410.260.8979 or sandra.olek@maryland.gov.

Sincerely,

Sandi Olek

Sandi Olek
Chesapeake and Coastal Service
Maryland Department of Natural Resources