ROBERT G. CASSILLY Harford County Executive

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SHANE P. GRIMM, AICP Director of Planning & Zoning

June 11, 2024

Mr. Timothy Bourcier, AICP, JD Director of Planning City of Havre de Grace 711 Pennington Avenue Havre de Grace, MD 21078

Re:

Draft 2024 City of Havre de Grace Comprehensive Plan

Envision Havre de Grace

Dear Mr. Bourcier:

Thank you for sharing the draft 2024 City of Havre de Grace Comprehensive Plan - Envision Havre de Grace with Harford County Planning and Zoning for our review. Harford County welcomes this opportunity and supports any effort to make our plans concurrent. We do this by seeking how to best align HarfordNEXT, the county master plan, with the proposed 2024 Envision Havre de Grace Comprehensive Plan.

Municipal Growth Element: A Strategy for Growth

In accordance with Maryland Code Section 3-206, the County is to review and consult with the City on its Municipal Growth Element (MGE) of their comprehensive plan. Draft 2024 Comprehensive Plan provides an analysis of the anticipated growth over the next twenty years. The plan notes that, except for parcels along US 40, there is limited opportunity for growth outside of the current city boundary. This is consistent with the land use plan of HarfordNEXT. Harford County offers the following comments based on our review of this section of Envision Havre de Grace.

Annexations Since 1990 (Map)

The blue shadings for "2000s Annexations" and "2010s Annexations" is hard to distinguish. Please consider utilizing shading with more contrast.

Water and Sewerage Facilities

It is unclear what the current water supply capacity is and what the projected growth will need to be. If 1,723,600 gpd is currently utilized, it appears that there is a reduction in the future demand with build-out. Or is the calculated 1,446,267 gpd in addition to the existing 1,723,600 gpd?

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Schools

For planning purposes, it is important to note that Havre de Grace Elementary School is currently over capacity and is projected to remain over capacity. Based on the APF chapter of the Harford County Code, the level of service standard for Public Schools is 110-percent of rated capacity within three years for elementary and secondary schools. Preliminary plans for subdivisions of greater than five lots cannot be approved in school districts where the full-time enrollment currently exceeds, or is projected to exceed, 110-percent of capacity within three years. However, municipalities are not subject to the County's APF; therefore, the County cannot restrict subdivisions within municipalities.

The City should consider language in the MGE that discusses how it intends to control growth to mitigate the impacts of school districts that are or will be projected to be over capacity. Although the City has an APFO, it is designed to encourage the Board of Education to consider redistricting to adjacent school districts with excess capacity. At a minimum, the County recommends that the City coordinate the review of residential development plans with the Board of Education so that they can anticipate additional pupil yields.

Sensitive Areas: Environmental Resource Protection

- Habitat Areas Because of the uniqueness of habitat areas such as SAVs, consideration could be given to
 including in the Beyond 2023 section a mention of exploring a grant opportunity to enhance the SAV population
 in this area.
- Grant Funding Consider adding Building Resilient Infrastructure and Communities (BRIC) as a potential grant/funding opportunity.

Historic and Cultural Resources

- Consider adding a discussion of the recent NRHP listing of the Hirsch Residence (HA-2290) at 605 Giles Street
 as a way to incorporate preservation of the recent past to the "Background of Local Preservation Efforts"
 discussion beginning on page 10-2.
- Update references to the Certified Local Government (CLG) program to reflect the City's designation as a CLG in 2024.
- The "preservation light" approach described within the section "Strengthening Preservation within the City" is similar to the conservation district ordinance pursued by the City of Brunswick, Maryland in 2020. See the work completed by their Preservation and Revitalization Committee for guidance on drafting a conservation ordinance and design guidelines.
- Goal 2, Point 6: Consider breaking into objectives:
 - a. Develop historic plaques to identify and celebrate properties protected as Havre de Grace Landmarks.
 - b. Re-institute the use of historic markers to identify buildings of significant historic value. This may be an opportunity for a partnership with a historic preservation advocacy organization such as Preservation Maryland or the Historic Havre de Grace Foundation.

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Transportation Planning

• Functional Classification – The functional classification map is somewhat confusing and does not match the table. It would be clearer if the "local collector" layer is turned off and if the "Greenway Linkages" are part of a different map. Since the map is labeled Functional Classification Ped Map, it could be clearer if there is a Functional Classification Map and a separate Ped Map.

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

Sincerely,

Shane P Grimm, AICP

Director of Planning and Zoning

SPG/AR/sc

cc: Alex Rawls, Chief of Long-Range Planning

Matt Kropp, Environmental Planner, Long-Range Planning