



## Maryland DEPARTMENT OF PLANNING

6/7/2024

Volney H. Ford  
Chairman, City of Havre de Grace Planning Commission  
3430 Court House Drive Ellicott City, MD 21043

Dear Mr. Ford,

Thank you for the opportunity to comment on the draft Envision Havre de Grace Comprehensive Plan (Draft Plan). The Maryland Department of Planning (MDP) believes good planning is important for efficient and responsible development that addresses resource protection, adequate public facilities, housing, community character, and economic development. Please keep in mind that MDP'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.

MDP 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, Disabilities, and Housing and Community Development. To date, we have received comments from the Maryland Department of Housing and Community Development. These comments are included with this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

The department hopes that Havre de Grace considers the comments included in this review as a reflection of our desire to support Havre de Grace in its stated purpose to "encourage development of a safe, healthy, and distinctive living environment-one that serves the existing community, entices visitors, and stimulates economic development." MDP commends the city for the forward-looking Draft Plan, and notes that our suggestions are intended to help further the implementation of this vision. MDP staff are available and eager to assist Havre de Grace in any Draft Plan updates, including meeting the Housing Element requirements of HB1045 and HB90. Please let the department know if the city would like to meet with us to discuss our comments.

MDP respectfully requests that this letter and accompanying review comments be made part of the city's public hearing record. When Envision Havre de Grace is adopted, please send Brooks Phelps a copy of the PDF document.

If you have any questions or concerns regarding these comments, please email the Central Maryland Regional Planner, Brooks Phelps at [brooks.phelps@maryland.gov](mailto:brooks.phelps@maryland.gov).

Sincerely,

Joe Griffiths, AICP  
Director of Planning Best Practices

Enclosures: Review Comments Envision Havre de Grace Draft Comprehensive Plan

cc: William T. Martin, Mayor, City of Havre de Grace  
Timothy Bourcier, Planning Director, City of Havre de Grace  
Susan Llareus, Planning Supervisor, Maryland Department of Planning  
Tracey Taylor, Director, Lower Eastern Shore Regional Office, Maryland Department of Planning  
Brooks Phelps, Regional Planner for Central Maryland, Maryland Department of Planning



**Maryland Department of Planning  
Review Comments  
Envision Havre de Grace Draft Comprehensive Plan**

The Maryland Department of Planning (MDP) received the Draft Envision Havre de Grace Comprehensive Plan 2024 (Draft Plan) from the City of Havre de Grace on April 10, 2024. 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 and others may submit comments separately. If comments are subsequently received by MDP, the department will forward them to the town.

**Draft Plan Summary**

This Draft Plan is a full update to the adopted and approved 2004 Havre de Grace Comprehensive Plan and its Municipal Growth and Water Resources Elements, added and adopted in 2010. The Draft Plan diverges from the currently adopted comprehensive plan in that it includes the state’s twelve planning visions (12 Visions) in addition to visions specific to Havre de Grace. It also shifts away from municipal growth and prioritizes supplying water and sewer services to existing communities for infill and current planned developments. In addition, MDP believes the Housing Element does not meet certain requirements following the passage of HB1045 and HB90 and requests that the city discuss this with its municipal attorney. MDP requests that Havre de Grace include a map denoting potential annexation areas in its Municipal Growth Element to better communicate the location of such areas and ensure that comprehensive plan consistency with future annexation proposals can be clearly defined. MDP also notes that the Draft Plan could be improved by enhancing clarity and consistency between chapters and could be edited for syntax throughout.

**Maryland State Visions – Synopsis**

Land Use Article Section 1-201 requires Maryland jurisdictions with planning & zoning authority to implement the state’s twelve planning visions (visions) through the comprehensive plan. The visions reflect the state’s ongoing aspiration to develop and implement sound growth and development policy. The visions address: quality of life and sustainability; public participation; growth areas; community design; infrastructure; transportation; housing; economic development; environmental protection; resource conservation; stewardship; and implementation approaches.

**Plan Analysis**

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The Preamble of the Draft Plan explains the purpose of the comprehensive plan on the “A Guide For Smart Growth” page:

“The purpose of the Comprehensive Plan is to encourage development of a safe, healthy, and distinctive living environment—one that serves the existing community, entices visitors, and stimulates economic development. Also crucial is the desire to retain the small-town aspects of Havre de Grace which so many people cite as being critically important. Historic areas preservation and enhancement remain as a primary planning objective, however, the entire community must be considered in respect to planning and development decisions and programs. Residential neighborhoods, commercial revitalization, and

industrial areas must be approached with the same care and thought when policies are planned and implemented.”

Maryland’s Planning Act of 1992, and subsequent legislation in 2000 and 2009, require that the 12 Visions be included and implemented through local comprehensive plans. Those 12 Visions are found in the Land Use Article and the Maryland Economic Growth, Resource Protection, and Planning Policy of the State Finance and Procurement Article, Subtitle 5-7A. The Draft Plan includes the full description of the 12 Visions in the Preamble section.

The following is an analysis of each of the 12 Visions and comments relating to the comprehensive plan proposal to integrate these visions.

**(1) Quality of life and sustainability:** a high quality of life is achieved through universal stewardship of the land, water, and air resulting in sustainable communities and protection of the environment;

**Comment:** The Draft Plan addresses this vision thoroughly in Chapter 9: Sensitive Areas.

**(2) Public participation:** citizens are active partners in the planning and implementation of community initiatives and are sensitive to their responsibilities in achieving community goals;

**Comment:** This vision is addressed beginning on page 6-11, which discusses the planning process for the Draft Plan, public involvement for other areas such as new planning initiatives, and specifically discusses how the vision relates to the Draft Plan.

**(3) Growth areas:** growth is concentrated in existing population and business centers, growth areas adjacent to these centers, or strategically selected new centers;

**Comment:** The Draft Plan makes it clear that any growth would likely come on former agricultural land away from the existing residential and economic centers, or through heavily restricted infill. While MDP respects local decision-making with respect to land use patterns and community character, MDP encourages the town to broaden its vision of concentrated growth and consider promoting an array of housing unit types be built in the town, particularly considering the high cost of housing within the community and the housing crisis across the state.

**(4) Community design:** compact, mixed-use, walkable design consistent with existing community character and located near available or planned transit options is encouraged to ensure efficient use of land and transportation resources and preservation and enhancement of natural systems, open spaces, recreational areas, and historical, cultural, and archaeological resources;

**Comment:** The Draft Plan prioritizes the aesthetic requirements for infill development and requires specific housing types and design for the historic town center of Havre de Grace. However, new development is proposed far from transit options on the edges of the existing community and does not contain a mix of uses to increase walkability.

**(5) Infrastructure:** growth areas have the water resources and infrastructure to accommodate population and business expansion in an orderly, efficient, and environmentally sustainable manner;

**Comment:** The Draft Plan adequately addresses water resources in Chapter 8 but is focused on planning for existing and planned areas rather than expansion. The section on wastewater notes that the city may

have difficulties providing the nutrient treatment required to support the growth areas outlined in the land use plan (8-9).

**(6) Transportation:** a well-maintained, multimodal transportation system facilitates the safe, convenient, affordable, and efficient movement of people, goods, and services within and between population and business centers;

**Comment:** The Draft Plan addresses this vision throughout Chapter 11, heavily emphasizing new bicycle and pedestrian improvements. However, this vision could be further implemented by expanding upon the need for public transportation described in the actions on page 11-25.

**(7) Housing:** a range of housing densities, types, and sizes provides residential options for citizens of all ages and incomes;

**Comment:** The Draft Plan does not appear to fully address this vision and does not include a discussion of the need for different densities, types, and sizes of homes. Low-income housing, as defined in Land Use Article Section 3-114, is not discussed, while senior housing is discussed to exclusively provide homes for childfree households, rather than as a strategy to address housing issues for seniors.

**(8) Economic development:** economic development and natural resource-based businesses that promote employment opportunities for all income levels within the capacity of the State's natural resources, public services, and public facilities are encouraged;

**Comment:** This vision is addressed in Chapter 7, which identifies existing industries and areas where new employment sites and industries may be located.

**(9) Environmental protection:** land and water resources, including the Chesapeake and coastal bays, are carefully managed to restore and maintain healthy air and water, natural systems, and living resources;

**Comment:** The Draft Plan addresses this vision in Chapter 9: Sensitive Areas.

**(10) Resource conservation:** waterways, forests, agricultural areas, open space, natural systems, and scenic areas are conserved;

**Comment:** The Draft Plan discusses the conservation of resources in Chapter 9: Sensitive Areas, and open space in Chapter 3: Sustainable Communities.

**(11) Stewardship:** government, business entities, and residents are responsible for the creation of sustainable communities by collaborating to balance efficient growth with resource protection; and

**Comment:** The Draft Plan includes several development sites on former agricultural rather than the identified revitalization areas. The sensitive areas element shows how the tree canopy has dissipated over the last few decades. The growth element includes parcels along Route 40 identified for future growth.

**(12) Implementation:** strategies, policies, programs, and funding for growth and development, resource conservation, infrastructure, and transportation are integrated across the local, regional, State, and interstate levels to achieve these visions.

**Comment:** The Draft Plan specifically addresses the Implementation Element on page 6-1 and continues discussing implementation strategies throughout Chapter 6.

In conclusion, the Draft Plan includes some of the 12 Visions by integrating discussions into the Draft Plan to meet the requirements of the Land Use Article, but the housing, community design, transportation, and stewardship sections could be enhanced, as described above, to fully implement the visions.

### Municipality Minimum Planning Requirements

LUA Section 3-102 describes the required and optional elements for non-charter county and municipal comprehensive plans but does not mandate how they are to be addressed. The following checklist identifies required plan elements and how the Draft Plan addresses them.

<b>Checklist of Maryland Code (Land Use Article) Element Requirements for Non-Charter Counties and Municipalities</b>			
<b>Comprehensive Plan Requirements</b>	<b>MD Code Reference</b>	<b>Additional MD Code Reference</b>	<b>Reference</b>
(1) A comprehensive plan for a non-charter county or municipality must 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>	Chapter 12; Community Facilities
(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>	Chapter 9 page 6, 9
(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>	Chapter 1: Visions and Goals
(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>	Chapter 15: Housing Element: Data and Analysis
(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>	Chapter 2: Land Use: A Whole-City Plan
(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>	Chapter 13 page 8
(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>	Chapter 9: Sensitive Areas: Environmental Resource Protection
(g) a transportation element	<a href="#">L.U. § 3-102(a)(1)(viii)</a>	<a href="#">L.U. § 3-105 -- Transportation element</a>	Chapter 11: Transportation: A Focus on Multimodal Options
(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>	Chapter 8: Water Resources: Supply and Protection
(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>	Chapter 4: Municipal Growth Element: A Strategy for Growth
(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>	Chapter 9 pages 9-11
<b>Optional:</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	<a href="#">L.U. § 3-102(b)</a>	<a href="#">L.U. § 3-102(b)(2)(i)</a>	

<b>Checklist of Maryland Code (Land Use Article) Element Requirements for Non-Charter Counties and Municipalities</b>			
<b>Comprehensive Plan Requirements</b>	<b>MD Code Reference</b>	<b>Additional MD Code Reference</b>	<b>Reference</b>
preservation area (PPA) element			
(3) Visions -- A local jurisdiction SHALL through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	<a href="#">L.U. § 3-201(c)</a>	<a href="#">L.U. § 1-201 -- The 12 Planning Visions</a>	Included in the introductory chapter on pages 16-17.
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>		Included on page 310 of combined pdf document.

### **Conformance with Section 3-102 of the Land Use Article**

The following analyzes whether the Draft Plan meets the requirements of the required municipal comprehensive plan elements, in accordance with the LUA.

#### **1. Development Regulations Element – Synopsis**

The element is required to include the planning commission’s recommendations for land development regulations to implement the plan. Regulations are required to be flexible to promote innovative and cost saving site design, protect the environment, and identify areas of growth. The areas identified for growth are required to encourage flexible regulations, which should further promote economic development using innovative techniques, streamlining the review of applications, including permit review and subdivision processing.

#### **Plan Analysis**

The Draft Plan includes a Development Regulations section within the Housing Element on page 13-8 and 13-9, as well as a map showing areas with potential future housing opportunities on page 13-11. It describes restrictions for the types of homes that can be developed, rather than examining the need for a variety of housing and businesses that would best serve the city’s residents. This element could be enhanced by providing more strategies and actions encouraging flexible and varied housing types in the identified growth areas.

This section discusses issues with age-restricted housing and notes that previous attempts were not restricted enough, resulting in families of all ages living in an area designated as a Planned Adult Community (PAC). MDP notes that this likely reflects an unmet need for additional housing for all types of households and families in Havre de Grace, more so than the need to close the loophole in the PAC law. Age restricted housing developments rely on restrictive covenants for enforcement. This may be a legal issue relating to deeds, not a zoning code problem.

This section also discusses Accessory Dwellings Units (ADUs), noting that Havre de Grace currently allows ADUs that conform to their local specific guidelines and requirements.

Infill housing and the RO zoned former Harford Memorial Hospital site are discussed as potential locations to encourage new development. However, each of these would be regulated by design standards including a form-based code for the hospital site. MDP notes, as does the Draft Plan on page 13-9, that

development in the entirety of Havre de Grace is restricted by either large impact fees and parking requirements on the outer edges or specific design requirements in the historic core. To promote reinvestment in the community, flexible regulations that respond to market conditions are recommended.

## **2. Housing Element - Synopsis**

The housing element is required to address the need for housing within the jurisdiction that is affordable to low-income and workforce households. The housing element is required to also assess fair housing and ensure that a jurisdiction is affirmatively furthering fair housing through its housing and urban development programs.

### **Plan Analysis**

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The Housing Element in Chapter 13 is introduced by acknowledging HB 1045 and HB 90, as well as MDP's efforts to create models, guidelines, and a webpage to help guide communities (13-1). MDP is pleased to see that the Draft Plan includes many of the resources the department developed to help jurisdictions complete housing elements and welcomes feedback on how we could improve these resources.

This section states that the city is focused on enhancing housing for low to moderate-income (LMI) households and defines LMI as households making between 60% and 120% of the area median income (AMI). This section does not fully address HB 1045 affordability definitions and ranges, which require planning for housing that is affordable to low-income households with an income of 60% or less of AMI. It does include the income thresholds for low and very low-income level ranges in Table 1 and the ranges of affordability in Table 2 (13-3)

Workforce housing is defined according to Land use Article Section 3-114 under the Housing Burden section on page 13-2, including the lower threshold for rental units. However, an assessment specific to the housing affordability needs of Havre de Grace's workforce households would better address the housing element requirements to "address the need" for affordable housing, particularly as the total number of rental units has declined and the rental housing burden increased from 30.3% to 44.8% between 2000 and 2020 (Housing Element Data and Analysis, page 8). Exhibits 2 and 4 on pages 13-4 and 13-5 show the proportions of cost-burdened households for owners and renters, but do not analyze workforce or low-income needs.

The Draft Plan is missing text that could help the Housing Element meet the requirements of Land Use Article Section 3-114, as added by HB 90, to affirmatively further fair housing (AFFH) through an assessment and meaningful actions to overcome disparities, barriers to opportunities, and patterns of segregation. A Fair Housing section is included on page 13-15, but simply states that the city recognizes the Federal Fair Housing Act and Section 20-702 of the Annotated Code of Maryland, and that it will report violations. MDP believes that this statement is not sufficient to meet the requirements of HB 90, which stresses the need for housing elements to affirmatively further fair housing, as defined in Housing and Community Development Article Section 2-401.

While Land Use Article Section 3-114 does not define what a fair housing assessment should entail nor what specific actions should include, MDP recommends a spatial analysis of segregation and concentrated poverty to determine current patterns, which could then inform meaningful actions to correct them. Page 13-15 references the Maryland Department of Housing and Community Development AFFH survey, recently completed and submitted by the town. MDP suggests that the Draft Plan include more language, responses, or conclusions that arose during the completion of that survey.

The Draft Plan includes a summary of affordable housing partners and completed projects, including those related to Low-Income Senior Housing, Affordable Housing, and Public Housing. MDP suggests the inclusion of a separate section that directly addresses Senior Housing and aging-in-place issues.

MDP suggests that the requirement for three new parking spaces for all residential units is too many and will negatively impact the cost and development of new housing (13-9). In the next section, waiving the Capital Cost Recovery and other impact fees is suggested to encourage development. MDP recommends that reducing parking requirements or offering a lower fee-in-lieu could provide a similar incentive, while providing additional spatial benefits.

The section on Homelessness Assistance (13-10) is focused on meeting the needs of recently homeless persons and bridging short-term gaps for resources. This is an important inclusion and one that many housing elements do not include. It could be strengthened by including additional strategies for addressing homelessness or short-term shelters beyond hotel vouchers for recently unhoused persons.

### **3. Sensitive Areas Element – Synopsis**

The sensitive areas element is required to include the goals, objectives, principles, policies, and standards designed to protect sensitive areas from the adverse effects of development (more recently referred to as climate change impacts). The LUA also assigns sensitive areas element data provisions and review responsibilities to the Maryland Departments of the Environment and Natural Resources.

#### **Plan Analysis**

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Chapter 9 of the Draft Plan discusses the sensitive areas and natural resources within Havre de Grace, and includes action items for furthering conservation, improving environmental standards for buildings and land use, and enforcing dark sky codes, among others. MDP believes this is satisfactory from a planning perspective but notes that the loss of forest cover due to development is significant and encourages the city to implement strategies that prevent this from becoming a worsening issue in the areas proposed for new development in the land use chapter of the Draft Plan. The action items related to forest conservation and other sensitive areas on pages 9-13 – 9-14 are a good starting point and should be expanded upon.

### **4. Transportation Element - Synopsis**

The transportation element is required to reasonably project into the future the most appropriate and desirable location, character, and extent of transportation facilities to move individuals and goods, provide for bicycle and pedestrian access and travelways, and estimate the use of proposed improvements.

#### **Plan Analysis**

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Chapter 11 is the Transportation Element, and its subtitle indicates that it is focused on multimodal transportation. Though many modes are summarized throughout the chapter, the action items are largely focused on new bicycle and pedestrian connections and expanding road capacity rather than a full multimodal approach and analysis.

The inclusion of the Susquehanna River Rail Bridge project and its analysis of a potential bicycle and pedestrian access route is consistent with Maryland's sustainability goals of increased multi-modal transportation solutions and economic development opportunities. Providing increased bicycle and pedestrian access across the river will help expand access to Perryville and provide connections to regional and national bicycle trails such as the East Coast Greenway and the 9/11 National Memorial Trail.



MDP recommends differentiating between tourist and recreational transportation and commuter transportation options. Boating, a weekend trolley, recreational trails, and an airport used for a flight school are unlikely to be used for significant amounts of travel.

Although rail service and transit-oriented developments are discussed within the transportation element, both relate to the Aberdeen MARC/Amtrak and Perryville MARC stations, as no rail exists in Havre de Grace. MDP suggests that a potential rail stop in Havre de Grace would allow for the additional development proposed in the Route 40 corridor and help to relieve the need for new highways and the city's high parking requirement.

Bus service is briefly discussed but does not consider whether the level of service is adequate to serve the needs of residents, including hours, frequencies, shelters, and other factors. MDP notes that only the Harford Transit Link Green and MTA 420 bus routes serve neighborhoods of Havre de Grace itself, while the Teal Route and Greyhound use stops in the McDonalds and 7-11 parking lots on Route 40. The Harford Transit Link routes only run once per hour and end service by 8 p.m. In addition, the newer, more suburban parts have no bus service. MDP recommends including an evaluation of service for the entirety of the community.

Discussion of an Adequate Public Facilities Ordinance (APFO) for transportation is included on page 11-20. MDP encourages the city to consider transit, pedestrian, and bicycle accessibility improvements as part of APFO mitigation measures.

### **5. Water Resources Element – Synopsis**

The Water Resources Element (WRE) is required to consider available data provided by MDE to identify drinking water that will be adequate for the needs of existing and future development proposed in the plan, as well as suitable receiving waters and land areas to meet stormwater management and wastewater treatment and disposal needs. MDE and MDP are available to provide technical assistance to prepare the water resources element, ensuring consistency with MDE programs and goals.

#### **Plan Analysis**

Overall, the Water Resources Element is comprehensive and addresses the city's water planning needs. It clearly describes the city's water, sewer, and stormwater management systems, and addresses flooding, climate change, sea level rise, and suitable receiving waters with town-specific metrics, maps, tables, action items, and resource links. The Draft Plan indicates it will prioritize water and sewer capacity for existing development over expanding to new areas but would be improved with more clarity as to whether this will act as a barrier to re-development. MDP recommends flexibility to promote reinvestment into the community.

### **6. Goals and Objectives Element - Synopsis**

This element requires that comprehensive plan goals, objectives, principles, policies, and standards guide the development, economic growth, and social well-being of the community.

#### **Plan Analysis**

The goals and objectives are not listed in a consistent way throughout the Draft Plan. For example, a single broad goal is listed along with 19 actions in the Land Use Element (2-17) while the Historic and Cultural Resources section lists several goals and supporting actions (10-12). Other chapters, such as the Housing section lists "Strategies" without goals (13-14), while the Transportation section lists "Visions"

and supporting actions (11-25). MDP recommends a consistent format that includes broad goals and specific objectives for each section and/or chapter.

MDP recommends that all goals and objectives also set priorities, meet the needs of the community in an inclusive manner, be data driven, list possible partnerships to achieve the goals, and list possible funding sources to leverage capital.

## **7. Land Use Element - Synopsis**

The Land Use Element is required to reasonably project into the future the most appropriate and desirable patterns for the general location, character, extent, and interrelationship of the uses of public and private land.

### **Plan Analysis**

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The Land Use Element identifies revitalization and growth as two sides of the same coin, with the goal of an “integrated, whole city” that would blend Havre de Grace’s many neighborhoods. However, the majority of the remainder of the chapter focuses on greenfield development on former agricultural sites and would maintain the major barrier between the suburban side and historic core.

The Gateway to Havre de Grace section (2-3) discusses the development of the southeast quadrant of the MD-155/I-95 interchange, for which 400 acres have been annexed. This section suggests that preserving views of the Chesapeake from this vantage point is the utmost priority and it is implied that this will impact the way that the area is developed. MDP encourages the city to balance the best possible development while encouraging the preservation of sightlines, where feasible. In addition, major investment in road and highway infrastructure will be required to develop the Gateway, as it is intended to be a major mixed-use center with retail, commercial, and office uses.

MDP suggests that focusing on the Route 40 corridor is also an important element for a mixed-use development, identified elsewhere in the Draft Plan. This area would serve to bridge the existing suburban developments and the historic core, while providing new amenities to current residents and allowing the new residents to better access the core. This would better align with the stated goals of creating a “whole city.” This corridor has the existing Route 40 interstate but would also allow for an infill station along the MARC Penn Line to facilitate alternative modes of travel and lessen the burden on small suburban roads between the development and I-95. The Route 40 area was rezoned to allow for residential uses and is considered a future growth area on page 2-8, but not a named priority.

The “Developing Areas” section beginning on pages 2-6 summarizes many of the mixed-use Gateway development areas. MDP advises that most of what is described here (detached single family homes, condominiums, townhomes, and an office park in a separate area) would not be considered mixed-use, implied as the intent on page 2-3, except for the Green/Ianniello/Patrone property. The Downtown Mixed Use areas on the Land Use Plan Map (2-14) could be extended elsewhere to create a similarly desirable, low to medium-density area in these areas, which would also reduce the overall need for more road capacity. In addition, the “Gateway” land use category on pages 2-17 does not include residential uses.

“Seven Revitalization Areas” are identified and described on pages 2-5. The strategies for revitalization include applying for grants, improving signage and streetscaping, and including design guidelines that would restrict development within the corridor. MDP recommends narrowing this area to the older historic areas around the waterfront and removing the areas around the Route 40 corridor. Supporting an

area this large with only grants and restricting development while growing outward will likely impact the ability of the historic center to maintain its infrastructure and businesses in the long-term. In addition, maintaining the current uses of the Route 40 corridor will continue to impose a barrier to the stated goal of a “whole city”.

MDP recommends the action item “Identify underutilized, existing developed properties for priority reuse.” be incorporated into the planning areas elsewhere (pages 2-18).

MDP recommends that a coordinated discussion between Havre de Grace, Aberdeen, and MDP could help to determine the future annexation patterns that would best serve residents located between the two municipalities, as the two now share a boundary.

## **8. Community Facilities Element - Synopsis**

The Community Facilities Element is required to propose, as far into the future as is reasonable, the most appropriate and desirable patterns for the general location, character, and extent of public and semipublic buildings, land, and facilities. These facilities may include, but are not limited to fire stations, libraries, cultural facilities, hospitals, places of worship, school and education facilities, and parks.

### **Plan Analysis**

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#### **Parks, Recreation and Open Space**

This section references the Harford County Land Preservation, Parks & Recreation Plan (LPPRP) and includes a summary of local, private, and regional parks as well as playfields, trails, and recreational centers. However, no discussion of specific recreational needs is included in this section or in the actions list, although the final action is to review the number of fields and courts to determine if they are adequate. This analysis would be useful to this discussion, as well as that of the school facilities, since they are often incorporated together.

#### **Museums and Cultural Facilities**

This section includes a full summary of cultural facilities and museums in Havre de Grace, with an action plan. MDP notes that the syntax in the introductory sections paragraphs is confusing.

#### **Schools**

The schools section summarizes the current efforts toward elementary school redistricting and the expectations that Havre de Grace will continue to need to find additional seats. It also includes a short-term projection of school enrollment up to the 2025-2026 school year. MDP suggests projections further out to determine if additional construction is needed, particularly at the Middle/High School where redistricting will be limited because it is the only secondary school. Identifying locations for future secondary schools or expansions is included in the Actions for Schools section. In addition, the Higher Education section begins by naming colleges within a 50-mile radius, but it is not clear how this is relevant to comprehensive planning in Havre de Grace, as many of the institutions are quite far away from the city.

#### **Health Facilities**

This section lists the existing health facilities in Havre de Grace and includes broad action items that generally support the providers and their services. However, MDP recommends this section also include a needs analysis, as lack of hospital capacity is a rising issue serving as a tool to restrict housing development, sometimes considered on the same level as school and road capacity. To inform city leadership, residents, and other stakeholders, a hospital capacity needs analysis may help prevent further APFO restrictions on much needed residential development.

## **9. Municipal Growth Element - Synopsis**

The Municipal Growth Element (MGE) is only required in Maryland municipal comprehensive plans. The MGE is required to plan for and describe the municipality's past growth patterns, the capacity of land available for new and infill development, and areas outside of the existing corporate boundaries into which the municipality wishes to grow. The MGE is required to calculate the land area needed to satisfy the demand for growth based on population projections and desired densities. The MGE needs to consider and include any rural buffers, transition areas, and sensitive areas to be protected. MGEs are also required to consider and plan for the community facilities and public infrastructure, as well as their financing mechanisms, required to accommodate desired growth. If a municipality wishes to annex land, such areas are required to be included and described in the MGE.

### **Plan Analysis**

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The Draft Plan indicates that about 1,685 new dwelling units could be constructed on available land and suggests that the only new land that would be annexed would be along Route 40 for mixed-use development. The Draft Plan notes that the Growth Area has been reduced (pages 4-2), as the focus has turned to moving existing homes to public water and sewer based on the capacity available, due to selling water to Aberdeen and limited sewer capacity (4-4). MDP suggests the inclusion of a map that identifies specific parcels that could be annexed, and notes that there are many parcels away from Route 40 that surrounded by the Municipal Boundary.

## **10. Areas of Critical State Concern Element - Synopsis**

The Areas of Critical State Concern element is required to include planning commission recommendations to determine, identify, and designate areas that are of critical state concern.

### **Plan Analysis**

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This element is fulfilled on page 9-6 and 9-9 through 9-11. Page 9-6 discusses the required buffer around wetlands of special state concern, 12 of which are within Havre de Grace. Beginning on 9-9, the Chesapeake Bay Critical Area is discussed, including a map detailing the different designations and the Critical Area boundary.

## **11. Mineral Resources Element - Synopsis**

If current geological information is available, a comprehensive plan is required to include a mineral resources element. It should identify land that remains undeveloped to provide a continuous supply of minerals, which are defined in the Environment Article. They include clay, diatomaceous earth, gravel, marl, metallic ores, sand, shell, soil, and stone. The element is required to further identify post excavation land uses and incorporate strategies that balance resource extraction with other land uses and prevent, as much as possible, preempting mineral extraction in the jurisdiction.

### **Plan Analysis**

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The Draft Plan notes on page 2-14 that although a large quarry is visible outside of the city boundary, no mineral extraction takes place within Havre de Grace and therefore no mineral resources element is applicable.

## **12. Fisheries Element - Synopsis**

To facilitate commercial fish and shellfish harvesting and ensure reasonable access to waterways for watermen, a county with tidal waters is required to include a fisheries element. This element designates and maps areas on or near tidal waters for loading and processing fish and shellfish and docking and mooring of commercial fishing vessels.

## **Plan Analysis**

Pages 9-9 through 9-10 explain that “fisheries activities” are allowed as a resource utilization activity within the Chesapeake Bay Critical Area Resource Conservation Area subcategory. A map showing RCA locations is included on 9-10. MDP believes that this meets the requirements for a fisheries element.

### **13. Growth Tiers – Synopsis**

Pages 306-315 of the PDF include the Adopted Harford County Growth Tier Map as well as letters from the City of Havre de Grace concurring with Harford County’s Tier Map for the city, and a letter from former Director of Planning Services Rich Josephson confirming Havre de Grace’s adoption of Harford County’s growth tier map. The section includes a close-up map of Havre de Grace’s Growth Tiers, and references SB 236, the Sustainable Growth and Preservation Act of 2012 throughout. No changes are proposed here, but its inclusion will continue the adoption of the current growth tiers.

### **14. Plan Implementation**

Implementation of the Draft Plan is discussed in Chapter 6, Regulatory Framework, which includes a sidebar that defines the state vision for Implementation. It identifies priorities and tools for implementing the visions identified in the Draft Plan

The Land Use Article Section 1-207(c)(6) requires jurisdictions to submit a comprehensive plan implementation report every five years. MDP reminds the city to adhere to this requirement in the future.

### **State Data Center**

The State Data & Analysis Center has no substantive comments on the Draft Plan; however, they made the following three observations:

1. In the Municipal Growth Element, 2010 and 2020 population and population growth are discussed. Page 4-5 shows existing and estimated future development capacity and page 4-11 discusses water and sewage facility capacity. However, no estimation of future population growth is included in this section.
2. In the Economic Development and Tourism section on page 7-17, the Pacific Northwest Regional Economic Analysis Program (PNREAP) is misidentified as the Maryland Regional Economic Analysis Project (REAP). REAP was discontinued by the U.S. Bureau of Economic Analysis (BEA) in 2014, while PNREAP continues as a non-profit organization where the BEA left off.
3. The Demographic Data section appears to be largely sourced from ACS data; however, no source is provided for the tables and charts that accompany it. The commuting data (18-8) could be supplemented with data from the Census Bureau’s [OnTheMap](#) tool. This tool provides spatial data on commuting patterns, including how many persons commute into Havre de Grace, how many live and work within Havre de Grace, and how many residents commute to elsewhere around the region.

**Maryland Department of Planning Review Comments  
Draft Plan**

**STATE AGENCY COMMENTS**

The following are state agency comments in support of MDP's review of the Draft Plan. Comments not included here may be submitted under separate cover, or via the State Clearinghouse. If comments from other agencies are received by MDP, the department will forward them to the City of Havre de Grace as soon as possible.

**Attachments**

Page 14: Maryland Department of Maryland Department of Housing and Community  
Development

May 3, 2024

Brooks Phelps  
Maryland Department of Planning  
301 West Preston Street, 11th Floor  
Baltimore, MD 21201

Dear Mr. Phelps,

Thank you for the opportunity to review and comment on the Envision Havre de Grace 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 statutes and, if appropriate, Sustainable Communities 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 Plan.
2. The Plan identifies a need to revitalize the community 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 Jessica Argueta at 410-209-5849 or [jessica.argueta@maryland.gov](mailto:jessica.argueta@maryland.gov).
3. The Plan identifies a goal to support the vitality of its downtown. DHCD’s Maryland Facade Improvement Program (MFIP) provides funding for aesthetic improvements to the exteriors of businesses located in Maryland’s Sustainable Communities in order to stimulate local economic activity and support community development. Planning staff can learn more about MFIP online at <https://dhcd.maryland.gov/Communities/Pages/StateRevitalizationPrograms/MFIP.aspx> or by contacting Jessica Argueta at 410-209-5849 or [jessica.argueta@maryland.gov](mailto:jessica.argueta@maryland.gov).
4. The Plan identifies a goal to support sustainable housing that enables seniors to age in place. DHCD can 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).

5. The Plan identifies a goal to redevelop industrial properties 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 by contacting Jessica Argueta at 410-209-5849 or [jessica.argueta@maryland.gov](mailto:jessica.argueta@maryland.gov).
6. The Plan does not show that Havre de Grace has conducted a point-in-time count to identify the total number of people experiencing homelessness in Havre de Grace. 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). Persons experiencing homelessness who need assistance should contact 410-612-9909.
7. The Plan identifies the community's needs with respect to income and poverty. Havre de Grace or non-profits active in Havre de Grace 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).
8. The Plan identifies a need for affordable housing, including workforce and low-income housing. A portion of Havre de Grace is within a HUD Qualified Low-Income Housing Tax Credit (LIHTC) Census Tract and currently has two LIHTC properties totaling 57 units. If planning staff want to support further affordable housing development with LIHTC or other DHCD programs, information is available 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).
9. Havre de Grace'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>.
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 identifies a need for infrastructure improvements that increase overall safety. DHCD's Community Health and Safety Works program is a potential resource to support





these projects. More information on the program can be found online at <https://dhcd.maryland.gov/Communities/Pages/csw/default.aspx> or by contacting Eric Borchers, Project Manager, at 410-209-5833 or [eric.borchers@maryland.gov](mailto:eric.borchers@maryland.gov).

12. The Plan identifies a need to increase energy efficiency for buildings. DHCD has several programs that support energy efficiency, and more information on those programs can be found online at <https://dhcd.maryland.gov/Pages/EnergyEfficiency/default.aspx>.
13. The Plan identifies a need to fill vacant commercial properties. DHCD's Project Restore can be leveraged to attract and retain businesses that occupy vacant properties. More information on the program can be found online at <https://dhcd.maryland.gov/Pages/ProjectRestore/default.aspx> or by contacting Kristin Dawson at 410-209-5847 or [kristin.dawson@maryland.gov](mailto:kristin.dawson@maryland.gov).
14. Maryland House Bill 90 (2021) requires, effective January 1, 2023, that comprehensive plans include an assessment of fair housing. The Plan acknowledges this requirement and describes strategies to further fair housing by enhancing housing for low- to moderate-income households. The Plan does not assess local barriers that restrict access to housing and opportunities based on protected characteristics. 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 Havre de Grace 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  
Project Manager  
State Revitalization Programs

Cc: Joseph Griffiths, Maryland Department of Planning  
Jessica Argueta, DHCD Division of Neighborhood Revitalization  
John Papagni, DHCD Division of Neighborhood Revitalization

