



## Maryland DEPARTMENT OF PLANNING

7/30/2024

Sean D. Davis  
Chair, City of Baltimore Planning Commission  
100 N. Holliday St, Baltimore, MD 21202

Dear Mr. Davis,

Thank you for the opportunity to comment on the draft Our Baltimore, Your Baltimore Comprehensive Master 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 Historical Trust and Departments of Transportation, Natural Resources, and Environment. 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 Baltimore considers the comments included in this review as a reflection of our desire to support Baltimore in its stated purpose to "envision a Baltimore of harmony, inclusivity, and prosperity, where every resident is a cornerstone of its' thriving future." 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 Baltimore in any Draft Plan updates. 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 the Comprehensive Master Plan 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, Planning Best Practices

Enclosures: Review Comments Our Baltimore, Your Baltimore Draft Comprehensive Master Plan

cc: Brandon M. Scott, Mayor, City of Baltimore  
Chris Ryer, Director, Department of Planning, City of Baltimore  
Susan Llareus, Planning Supervisor, Maryland Department of Planning  
Brooks Phelps, Regional Planner for Central Maryland, Maryland Department of Planning



**Maryland Department of Planning  
Review Comments  
Our Baltimore, Your Baltimore Draft 2024 Comprehensive Master Plan**

The Maryland Department of Planning (MDP) received the Draft Our Baltimore, Your Baltimore 2024 Comprehensive Master Plan (Draft Plan) from Baltimore City on May 31, 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 city.

**Draft Plan Summary**

This Draft Plan is a full update to the adopted and approved 2006 City of Baltimore Comprehensive Master Plan 2007-2012. The Draft Plan has a distinct structure, describing the current housing market conditions, land use goals, and community development plans and opportunities before outlining specific policy recommendations and goals for 17 specific topics. It includes substantial references to other adopted plans, including area focused plans, citywide master plans, and strategy documents. MDP commends Baltimore City for completing a thorough and forward-looking comprehensive plan.

**Maryland State Visions – Synopsis**

Land Use Article Section 1-201 requires Maryland jurisdictions with planning & zoning authority to implement the state’s 12 Planning 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 Introduction of the Draft Plan explains the purpose of the comprehensive plan on page 15:

“The plan is intended to guide equitable neighborhood development over the next 10 years and beyond. The purpose of the plan is to advance policies that support current residents and make Baltimore an inviting place to live. The goal is to develop the city in a manner such that residents want to stay in Baltimore, benefit from staying in Baltimore, and invite people to move to Baltimore.”

It also includes a Vision Statement on page 23:

“Together, we envision a Baltimore of harmony, inclusivity, and prosperity, where every resident is a cornerstone of its’ thriving future.”

Maryland’s Planning Act of 1992, and subsequent legislation in 2000 and 2009, require that the 12 Planning Visions be included and implemented through local comprehensive plans. The 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 does not include the text of the

12 Planning Visions. MDP believes that the Draft Plan implements these visions throughout, even though they are not directly referenced. MDP recommends that they be included in the Introduction section alongside the Vision Statement.

**Municipality Minimum Planning Requirements**

Land Use Article (LUA) Section 3-102 describes the required and optional elements for 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. Baltimore City is a charter county in Maryland statute.

**Maryland State Elements**

The LUA sets forth the required components of a charter county 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 indicates each required plan element to be included in the Draft Plan, and the discussion that follows addresses how the Draft Plan adheres to these requirements.

<b>Checklist of Maryland Code (Land Use Article)-Charter County Division I, Title 1, Subtitle 4, Part II, Section 1-406 Elements-Charter counties.</b>			
<b>State Comprehensive Plan Requirements</b>	<b>MD Code Reference</b>	<b>Additional MD Code Reference</b>	<b>Our Baltimore, Your Baltimore Reference</b>
(1) The planning commission for a charter county <b>shall</b> include in the comprehensive or general plan the visions under § 1-201 of this title and the following elements:	<a href="#">L.U. § 1-406 (a)</a>		
(i) a development regulations element	<a href="#">L.U. § 1-406 (a) (1) (i)</a>	<a href="#">L.U. § 1-407 -- Development Regulations Element</a>	Growth and Retention Section
(ii) a housing element	<a href="#">L.U. § 1-406 (a) (1) (ii)</a>	<a href="#">L.U. § 1-407.1 -- Housing Element</a>	Policy Recommendations Section; Livable Places
(iii) a sensitive areas element	<a href="#">L.U. § 1-406 (a) (1) (iii)</a>	<a href="#">L.U. § 1-408 -- Sensitive Areas Element</a>	Policy Recommendations Section; Healthy Communities subsection
(iv) a transportation element	<a href="#">L.U. § 1-406 (a) (1) (iv)</a>	<a href="#">L.U. § 1-409 -- Transportation Element</a>	Policy Recommendations Section; Equitable Access subsection
(v) a water resources element	<a href="#">L.U. § 1-406 (a) (1) (v)</a>	<a href="#">L.U. § 1-410 -- Water Resources Element</a>	Not included
(2) a mineral resources element, IF current geological information is available	<a href="#">L.U. § 1-406 (a) (2)</a>	<a href="#">L.U. § 1-411 -- Mineral Resources Element</a>	N/A

(b) A comprehensive plan for a charter county <b>MAY</b> include a priority preservation area (PPA) element	<a href="#">L.U. § 1-406 (b)</a>	<a href="#">For PPA Requirements, see § 2-518 of the Agriculture Article</a>	N/A
(4) Visions -- A county <b>SHALL</b> through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	<a href="#">L.U. § 1-414</a>	<a href="#">L.U. § 1-201 -- Visions</a>	N/A
(5) Growth Tiers -- If a county has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the county's comprehensive plan	<a href="#">L.U. § 1-509</a>		Not included

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

The following analyzes whether the Draft Plan meets the requirements of the charter county 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**

Development Regulations are discussed throughout the Growth and Retention section, which begins on page 53. This section identifies areas around existing and planned transit stops, vacant and underutilized land, and areas where demand is projected to surpass its holding capacity under existing zoning which could be upzoned for future housing construction. It broadly promotes new growth strategies and areas for development, and several relevant recommendations are included in the Policy Recommendations section, specifically in the Livable Places subsection.

The Proposed Land Use Map (page 83, Themes page 84) includes changes based on the “themes” of Transit Oriented Development, Industrial-Residential Transition, Creative Reuse of Buildings, and Preserve Industrials Areas. The first three themes appear to encourage new development that would allow for innovative design and additional density in certain areas, which will promote flexibility that may not currently exist in older, established neighborhoods. However, MDP suggests that the fourth theme “Preserve Industrial Areas” may be at odds with the second “Industrial-Residential Transition”, which appears to encourage mixed-use encroachment into industrial areas, and could be enhanced with specific

references to areas where housing in light industrial areas should be encouraged. MDP also recommends including a current land use map for comparison with the proposed changes.

The Community Development Framework section (page 65) also includes strategies for targeting investment in identified “Impact Investment Areas”, “Middle Market Neighborhoods”, and “Asset Building Areas”, with an emphasis on revitalization and stabilization of neighborhoods through grant funding, demolition and rehabilitation of vacant houses, new construction, and other strategies, many supported by DHCD funding. Specific strategies are identified in this section to encourage development of community assets and support for neighborhoods in the Middle Market classification. While the neighborhoods identified as Stronger Market are not discussed in this section, MDP suggests strategies that could enable better access for Middle Market Neighborhoods, Asset Building Areas, and Impact Investment Areas to the resources within Stronger Market Neighborhoods and otherwise encourage investment that was previously discouraged through Redlining, as discussed on page 61.

The Policy Recommendations section includes several recommendations that would affect development regulations, including Affordable Housing Goal 1 Recommendation 1.11 “Prioritize affordable housing projects for faster review, more flexible uses, and lower fees”, which encourages flexibility for reviewing those projects (page 128). Likewise, Healthy Communities Goal 1.15 “Remove parking minimums for new development projects”, will help to lower development costs (page 201).

The Equitable Neighborhood Development “Goal 1: Increase engagement of under-represented individuals and groups in planning and community development” includes several recommendations such as “Share information about the permits process and requirements widely” (1.9), “Make public testimony more convenient for proposed development plans that are subject to City Council or the Board of Municipal Zoning Appeals (BMZA) approval” (1.10), and “For neighborhoods with little/no representation, provide a GIS-based mechanism, based on home addresses, that would directly notify residents of upcoming hearings and meetings that impact their area” (1.21) (pages 121-122). These recommendations support an important goal of transparency and equity. However, they also seem likely to increase the cost and implementation timelines for developers, and MDP recommends a process that both incorporates community outreach and feedback and streamlines the development process to offset costs and encourage more flexibility with what can be proposed. Such a strategy could support projects more responsive to the feedback from communities.

The city may benefit from considering brownfields as part of its redevelopment strategy within the Draft Plan since technical and financial assistance resources are available from the United States Environmental Protection Agency (EPA) to identify, assess, cleanup, and plan reuse for brownfields. EPA's [Re-Powering Mapper](#) is a tool that can help start to identify where brownfields are located within the city. MDP can provide assistance regarding accessing brownfield resources and more information is available on MDP's [brownfield assistance webpage](#).

## **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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Much of the Draft Plan is focused on housing, including its development, rehabilitation or demolition, placement, and the overall need.

Affordable housing is discussed in the Policy Recommendations section beginning on page 124. The Draft Plan defines affordable housing as a household spending less than 30% on housing and utilities. However, this could be considered a cost burden threshold rather than one for affordable housing.

Because Baltimore City has a significantly lower household median income than the area median income (AMI), MDP suggests enhancing the Draft Plan's definition of affordable housing to reference the city's median income, rather than solely using a percentage of AMI. Such a definition would address the LUA's housing element requirement while also tailoring affordability thresholds to the real incomes of the city households. For example, the language used in Baltimore City's Affordable Housing Trust Fund defines affordable housing according to the state's definition, which is for a household making 60% of the AMI. This includes households making approximately 50% more than Baltimore City's median income and may not be representative of true housing need. MDP also suggests defining what would constitute very-low-income housing as well as workforce housing.

While as a charter county Baltimore City is not mandated to incorporate the requirements of HB 90 to "affirmatively further fair housing", MDP believes that the Draft Plan more than satisfies the requirements of the bill by endorsing the development significant affordable housing, mixed-income communities, development without displacement, and locating new housing near amenities such as transit. MDP also notes that with the General Assembly's approval of SB 274 during the 2024 session, charter county housing elements adopted after January 1, 2025, will also be required to affirmatively further fair housing.

MDP suggests an additional Draft Plan recommendation to create and adopt a manual for rowhome maintenance, similar to the [Philadelphia Rowhome Manual \(2008\)](#). This would help to assist homeowners and small landlords with maintenance and to sparing additional housing from future demolition.

The Draft Plan's Food Access section (beginning page 170) has a heavy emphasis on urban agriculture, including supporting the sale of vacant lots for farms and reducing barriers to urban farming. While MDP broadly supports the community engagement and resiliency that these farms can support, MDP suggests altering these recommendations to short-term solutions. Most vacant properties are located in areas designated in the Draft Plan as "Asset Building Areas" (page 65) which may have a need for urban farms for nutrition and neighborhoods stabilization. However, permanently transitioning properties to farmland or pocket parks (page 145) may undermine long-term growth goals by lowering residential capacity below the threshold needed to support amenities in large interior sections of Baltimore City while adding to maintenance cost without a significant increase to food production capacity.

MDP notes that these recommendations are appropriate with a city faced with population loss, as Baltimore has since the 1950s, but the Draft Plan is consistently pro-growth, as it states in the Introduction ("Baltimore is on the precipice of a renaissance", page 54) and in the Growth and Retention section. Conversely, the recommendation to create food co-ops in every neighborhood would both support residents and do so without creating a spatial problem.

### **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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A Sensitive Areas element is included in the Healthy Communities subsection of the Policy Recommendations chapter. It is introduced through the lens of Environmental and Climate Justice, summarizes the city’s Floodplain Management and Community Resiliency Hub Programs, and references the Disaster Preparedness Plan and Climate Action Plan. Many of the other sections of the Draft Plan are also supportive of climate change mitigation, such as those focused on pedestrian connections and improving transit.

While these other adopted plans and programs contain more detailed strategies than those typically found in a comprehensive plan, many of them are focused on greenhouse gas reduction, recycling, and the aftermath of a major weather rather than mitigating its effects. MDP suggests the Draft Plan incorporate some additional recommendations focused on protecting sensitive areas and mitigating the effects on neighborhoods, especially if they will require significant funding.

The Healthy Communities recommendations include a broad goal of improving green infrastructure in flood prone areas. In addition, one of the specific climate risks faced by Baltimore City is sea level rise. MDP suggests that the Draft Plan incorporate recommendations relating to long-term infrastructure improvements related to protecting neighborhoods vulnerable to sea level rise near the harbor and Patapsco River.

The Draft Plan also includes a section about extreme heat and urban heat islands beginning on page 229. The recommendations are comprehensive and would be an excellent template for other climate change preparation and responsiveness, such as for flooding. MDP also recommends a full discussion of climate impacts.

### **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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A Transportation Element is included primarily in the Transportation Equity subsection of the Policy Recommendations chapter. As the title implies, it emphasizes transit equity and travel by alternative modes. Additional goals relating to freight and economic development through transportation are discussed in the “Inclusive Economy” subsection.

The “Walkability and Biking” paragraph on page 160 states that land use patterns can support walking and biking to destinations, and the following “Transit Oriented Development” paragraph suggests placing amenities near transit hubs. MDP suggests furthering these goals through the Proposed Land Use Map, which currently proposes that many of the most walkable neighborhoods in East and West Baltimore remain without significant commercial districts, with many converted to residential, demolished, or rezoned. Several of these corridors also have fractured street grids from urban renewal projects and the

placement of autocentric shopping centers, such as Gay Street or Linden Avenue and Bolton Street (which also has a fence dividing Bolton Hill from Reservoir Hill). MDP suggests that reconnecting neighborhoods and dismantling borders would help to better connect neighborhoods to amenities, as well as support existing and former corner commercial sites, which were largely designed for pedestrian or trolley access. These goals would also align with those expressed in the Reconnecting West Baltimore section of the Area Focused Plans chapter (page 291) and Goals 4 and 5 of the Inclusive Economy recommendations (pages 246-247).

MDP suggests that the Food Access section goal 4.10 “Establish at least one community-owned food cooperative in each region of Baltimore” will further walkability and could be coordinated within transit-oriented developments.

MDP recommends that the city include additional policies that would improve its current transportation system management to address roadway safety (TSM). The Draft Plan includes recommendations related to improving traffic safety, though none are listed as “Actions that can be implemented with existing resources” (page 226). Since these recommendations all require additional resources, implementation may be delayed indefinitely; therefore, MDP suggests including goals that could be achieved with available resources. MVA has additional resources here: <https://zerodeathsmd.gov/>

Map 15, which shows TOD opportunity sites, includes areas around the existing rapid transit and regional rail lines, as well as the proposed Red Line and North-South Corridor Study routes and North Avenue, which see frequent bus service (Page 89). While this map shows a large radius around each stop, it is not completely reflected in Map 13: Baltimore City Proposed Land Use Map from the Growth and Retention, which shows smaller or non-existent TOD sites around the existing rail site in Mount Washington, the North Avenue Corridor, or East Baltimore and Allendale where the Red Line is proposed. MDP suggests coordinating these two maps and standardizing the types of development that should be allowable near each type of transit. Perpetuating low density near existing and planned transit corridors will negatively affect the success of each line. In addition, MDP suggests including sites near dedicated bus lanes, which are now included in the state’s official TOD designations following the passage of [HB 12- Equitable and Inclusive Transit-Oriented Development Enhancement Act](#).

Recommendation 1.10 “Build an expansive Metro system to provide transit within the City and region” is a large goal. MDP suggests partnering with MDOT to develop a new rail master plan or to readopt the 2002 Baltimore Region Rail Plan to ensure comprehensive service and the prioritization of projects beyond the North-South corridor. MDP also recommends additional goals to maintain and improve service on the existing Metro Subway and Light Rail, such as modernizing the Light Rail’s signal priority on Howard Street.

MDP suggests Recommendation 3.19 could include parking structures and potentially discuss windowless facades and exhaust vents from larger buildings that impact the pedestrian experience in dense areas.

MDP suggests that “Goal 4: Embrace and implement “Complete Streets”, as part of Baltimore City’s transit culture to double the number of people who walk or bike to work in the next decade”, include a recommendation to permanentize successful pedestrian and bicycle infrastructure by replacing plastic bollards with steel and concrete where applicable.

The “Background” sections suggests that the construction of I-395, I-83, I-895, I-95, the portion of I-70 west known as the Highway to Nowhere had disproportionately negative effects on Black communities. However, only the “Highway to Nowhere” project has solutions identified as part of the USDOT



Reconnecting Communities Pilot Program. MDP suggests additional recommendations that support modern solutions to car pollution, especially considering the negative health externalities of exhaust and rubber tire pollution. These could include long-term projects such as the capping, demolition, or realignment of highways, and short-term mitigation through congestion charges, two-way street conversions and additional speed cameras. Many of these highways are also barriers to pedestrian access and push high-speed traffic into neighborhoods, which could be addressed through complete streets recommendations. Several traffic calming measures and placemaking strategies are included in the Healthy Communities Goal 3 recommendations but are geared toward deterring crashes rather than pollution.

### **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**

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A Water Resources Element or other discussion of water resources, including an analysis of current and future water and sewer demand and capacity and stormwater and wastewater management considerations, is not provided in the Draft Plan. A WRE is required statutorily per HB 1131. MDP suggests at a minimum that the Draft Plan could indicate if the WRE included in the 2009 update to the 2006 Baltimore City Comprehensive Plan will be used as the WRE for the new Draft Plan. However, if the 2009 WRE is no longer accurate due to current growth projections, then the WRE should be updated, especially for strategies and recommendations. MDP notes that growth projections, which do not appear to be included in the Draft Plan, would be needed to adequately update the WRE. In addition, the Draft Plan analysis should consider the capacity allocations provided to adjacent jurisdictions.

A [WRE guidance update](#) was published in 2022 to provide local governments with best practices regarding analyses and approaches for:

1. Ensuring receiving waters are protected as the local land use plan is developed and implemented, reflecting changes to the Maryland Department of the Environment’s (MDE) water resources programs over the past decade; and
2. Integrating climate change considerations, particularly flooding risks, into the drinking water, wastewater and stormwater assessments of the WRE.

### **6. 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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Baltimore City does not appear to have any areas with extractable minerals and therefore is exempt from this requirement.

## **7. Growth Tiers – Synopsis**

Baltimore City’s Growth Tier Map, adopted in 2012, is not included in the Draft Plan. Although the adoption of this map placed the entire jurisdiction into the Tier I category, it must be maintained and included in the comprehensive plan.

### **State Data Center**

The State Data & Analysis Center has no substantive comments on the Draft Plan.

**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 Baltimore as soon as possible.

**Attachments**

- Page 11: Maryland Department of Natural Resources
- Page 12: Maryland Department of Transportation, State Highway Administration and Intermodal Planning Division of the Port of Baltimore
- Page 15: Maryland Department of Maryland Department of Transportation, Maryland Transit Administration
- Page 17: Maryland Historic Trust
- Page 19: Maryland Department of the Environment



Wes Moore, Governor  
Aruna Miller, Lt. Governor  
Josh Kurtz, Secretary  
David Goshorn, Deputy Secretary

Maryland Department of Planning  
301 West Preston Street  
Suite 1101  
Baltimore, MD 21201

Memo: DNR comments on Baltimore City Draft Comprehensive Plan

To: Brooks Phelps  
cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on the draft Baltimore City Comprehensive Plan. The draft document was distributed to appropriate contacts at the Maryland Department of Natural Resources and reviewed. DNR offers the following comments:

DNR acknowledges and commends Baltimore on the high level effort put into community engagement in the comprehensive planning process. This plan sets a high standard for comprehensive planning. DNR would like to see greater mention of sea level rise. The section on *Stormwater, Flooding and Coastal Communities* note that the city experiences tidal and riverine flooding, but Baltimore City also experiences a lot of pluvial flooding - from rain and increasing precipitation. This has a big impact on urban flooding and should be noted in the stormwater and flooding section.

In the Trees and Forests section of the Baltimore City Comprehensive Plan, Goal #1 aims to increase the tree canopy within the city by planting more trees, focusing on areas experiencing extreme heat. Recommend that city planners, when updating the tree planting prioritization map (#1.5), also target areas along tributaries to the Patapsco River and inner harbor. Where possible, riparian buffers should be created or widened along stream corridors to help reduce extreme heat (to people and aquatic resources) and to reduce stormwater and pollutant runoff. Additionally, the city should include long-term maintenance of tree plantings in their TreeBaltimore plan to reduce impacts from invasive plant and animal species that could reduce tree survival and growth. Baltimore should also consider how increasing temperatures can impact the viability of trees planted and plan accordingly.

Baltimore City's Comprehensive Plan was found to be in line with the Department's goals of preserving land and providing recreational opportunities for the community.

Once again, thank you for the opportunity to provide comments. If you have any questions about these comments or would like further information, please do not hesitate to contact me at 443-534-4151 or [christine.burns1@maryland.gov](mailto:christine.burns1@maryland.gov).

Best,  
Christine Burns

## City of Baltimore Comprehensive Plan (Draft May 2024)

### MDOT SHA Regional and Intermodal Planning Division (RIPD) and Port of Baltimore Comments:

- Ensure all photos, logos, and images are high resolution.
- Ensure all links are functional and stats, figures, and maps are sourced and cited in the report.
- P. 9: The wording about the Port of Baltimore should be changed to reflect that the Port was partially closed due to the closure of the 50' channel. However, the full channel reopened to vessel traffic on June 10.
- P. 22. Approximately when is this plan anticipated to be finalized and adopted?
- P. 22. Mention of "Winter" in a timeline is too vague. For example, Winter 2023 could mean January 2023 (beginning of the year) or December 2023 (end of the year). It is recommended that Winter be replaced with "beginning" or "end".
- P.61. When discussing housing typologies, it is noted that areas of Canton and Locust Point have strong real estate markets. Overlaying racial characteristics over the map may provide insight and ways to create more diverse neighborhoods for the future.
- P. 109: Please see the Draft FY 2025-2030 CTP (to be released by Sept. 1, 2024) for updated project cost (expected to be close to \$543 million).
- P. 150. CHAP (Commission for Historical and Architectural Preservation (CHAP) and Urban Design & Architectural Advisory Panel (UDAAP) are integral resources to the City's architectural typology. Please make mention of them and their services in this section.
- P. 159. Consider mentioning that the City submits an annual transportation priority letter to the Secretary of Transportation, which identifies projects to improve the mobility, safety, and reliability of the City's transportation network.
- P. 160. Walking and Biking - Consider mentioning various state programs to improve and enhance bike and pedestrian infrastructure:
  - Transportation Alternatives (TA) Program: a reimbursable, federally funded program for local sponsors to complete transportation-related community projects designed to strengthen the intermodal transportation system. The program provides funding for projects that enhance the cultural, aesthetic, historic, and environmental aspects of the intermodal transportation system. The program can assist with projects that create bicycle and pedestrian facilities, restore historic transportation buildings, convert abandoned railway corridors to pedestrian trails, mitigate highway runoff, and other transportation related enhancements. Project sponsors are required to provide a minimum 20% of total project cost as a match.
  - Recreational Trails Program: a federally funded program MDOT SHA administers on a reimbursement basis. Like the TA Program, the Recreational Trails Program may reimburse a local project sponsor up to 80% of the project's total eligible costs to develop community-based, motorized and non-motorized recreational trail projects.
  - MDOT's Kim Lamphier Bikeways Network Program: allocates State transportation funds administered by MDOT The Secretary's Office (TSO) to promote biking as an alternative transportation mode. Similar to the TA and Recreational Trails programs, Bikeways grantees are required to provide a minimum 20% of total project cost as a match. The

matching fund contribution can be in the form of cash, an in-kind contribution, or a 3rd party contribution.

- P. 161. Consider mentioning that Amtrak is spending \$6 Billion upgrading the West Baltimore MARC Station, Penn Station, and the portion of the Northeast Corridor (NEC) that runs through Baltimore City and beyond.

This current and ongoing development, slated to be completed in 2035 will bring new jobs to residents, allow for resident's access other opportunities throughout the region, and has a commitment of \$50 million in community investment slated specifically for West Baltimore.

- P. 163. Related Plans and Initiatives – The following links either do not work or are not correct: The Baltimore City Transit Development Plan (TDP); BMC Resilience2050 Long Range Transportation Plan; Red Line.
- P. 256: This is an old picture of Seagirt. MDOT can provide a new one if necessary.
- P. 257: The plan uses old Economic Impact Numbers. The updated report can be find with this link: [MarylandEconomicimpactofPOB2023.pdf](#) There are 20,193 direct jobs with 2732,675 linked to the Port of Baltimore. The average wage of a direct job holder is 12.0% higher than the average wage in Maryland.
- P. 257. Capital Improvement Projects – Please include MDTA's Key Bridge Rebuild Project, anticipated to be completed in Fall 2028.
- P. 258. Frederick Douglass Tunnel: Recommend that it be clarified that this new tunnel will not be used for freight operations.
- Page 258. The HST tunnel estimated cost is now \$566 million.
- P. 259. Under Goal 1.3, this plan prioritizes resurfacing and reconstruction of the Hanover Street Bridge. Note that bridge repairs were recently completed in June 2023; including: replacement of the steel grid deck on the bascule span, upgrading of the operator's house, the addition of traffic gates, and miscellaneous structural repairs in the mechanical spaces.
- Page 260. Objective 2.2 –Ensure that trucks can move between industrial locations. Objective 2.5: Maryland Motor Trucking Association should also be included in this group.
- P. 274 – Baltimore Greenway Trail Network – Consider mentioning that the Baltimore Greenway Trail along Middle Branch, connecting the Gwynns Falls to the Inner Harbor Promenade is currently being pursued, which is funded for design by the SHA Transportation Alternatives Program (TAP); design is anticipated to be completed by the end of 2025. There is no funding for construction.
- P.278. In addition to the INSPIRE program, there are several safe routes to school efforts that are funded by SHA TAP, including:
  - Construction and reconstruction of curb ramps and adjacent sidewalks for ADA compliance, install pavement markings, ie. Crosswalk striping and stop line replacements, install school signs, and install flashing school beacons at Hilton Elementary, Tench Tilghman Elementary/Middle, Westport Academy Elementary and Middle and Pimlico Elementary and Middle Schools. Construction is anticipated to start in Summer 2024 and extend through the end of 2025.
  - Design of a 2-mile shared-use-path on the west side of Martin Luther King Jr. Boulevard to provide a safe route to elementary students at Mother Mary Lange Catholic School. Design is anticipated to be completed in Spring 2025. There is no funding for construction.

- Page 330: Under Transportation, Maryland Port Administration Master Plan (in progress) should be added.

Should you have any further questions or need the direct assistance of on our MDOT Transportation Modes, please feel free to call or email me directly and I will assist.

Thanks,

Dan

**DATE:** 6/28/2024  
**TO:** Dan Janousek, MDOT Planning and Capital Programming  
**FROM:** Matt Winkler, MTA Office of Planning and Programming  
**CC:** Albert Engel, MTA Office of Planning and Programming  
 Stephen Miller, MTA Office of Planning and Programming  
**RE:** *Our Baltimore* - Baltimore City Comprehensive Plan – Draft

The MDOT MTA Office of Planning and Programming, Project Development Division offers the following comments on the *Our Baltimore* - Draft Baltimore City Comprehensive Plan:

Page	Section	MTA Comment
86	Transit-Oriented Development Opportunities	For the following sentence: “The resuscitation of the Red Line presents a transformational opportunity to invigorate some of the long-disinvested neighborhoods along the proposed routes, particularly those in West Baltimore.”  Please consider revising to: “The resuscitation of the Red Line presents a transformational opportunity to invigorate some of the long-disinvested neighborhoods, particularly in West Baltimore, by providing a new high-frequency transit line that addresses a major gap in east-west transit service, through downtown Baltimore.”
87	What does Transit-Oriented Development look like?	If applicable for inclusion, MDOT was recently awarded RAISE funding to complete the preliminary design and environmental study for the Reisterstown Plaza Metro Station TOD project. If desired, MTA can provide renderings or public engagement materials to use as visuals in the comprehensive plan.
104	Major Redevelopment Areas – Planned	If applicable to the section, in the State Center section, please mention the site is a designated TOD site by MDOT and Baltimore City.
109	Table 9. Select State and Federal infrastructure projects	For the Red Line row of the table, please consider revising the paragraph to say that the mode and alignment are still under consideration through on-going community engagement and feasibility analysis, rather than “unknown.”
160	Transportation Equity – Walking and Biking	Please consider noting that transit infrastructure can also support walking and biking, such as the use of red painted bus lanes (as on North Avenue and Pratt Street) are shared use between cyclists and buses.
161	Current Efforts – Central MD Regional Transit Plan	Please change to “Regional Transit Plan for Central Maryland” for consistency. MTA will also be launching the 5-year update to the RTP later this year.
163	Current Efforts – Related Plans and Initiatives	Recommend adding <a href="#">BMORE BUS</a> to this list. BMORE BUS plan, currently under development and to be finalized at the end of 2024, will present a visionary network of bus service improvements that could be implemented over the next 5 to 10 years with additional capital resources/5 <sup>th</sup> bus division. Improvement options will include more frequent service, new and/or modified existing routes, new limited-stop service, and contracted services (microtransit and regional bus).



164	Recommendations 1.3 and 1.4	Some of the BMORE BUS identified service improvements (i.e. limited-stop service) may be dependent on roadway configuration and other infrastructure constraints. Discussions about near- and mid-term potential BMORE BUS infrastructure needs should be part of regular coordination between BCDOT and MTA.
164	Recommendation 1.6	Please add BMORE BUS



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**Maryland**  
**DEPARTMENT OF PLANNING**  
**MARYLAND HISTORICAL TRUST**

July 1, 2024

Mr. Brooks Phelps  
Regional Planner  
Maryland Department of Planning  
301 West Preston Street, Room 1101  
Baltimore, MD 21201

Dear Mr. Phelps:

Thank you for the opportunity to review Baltimore City's draft comprehensive plan and submit comments on behalf of the Maryland Historical Trust (MHT).

Overall, we find that the plan's recommended goals and actions for historic resources are well considered. We are especially supportive of a Baltimore City historic preservation plan, as well as a CHAP inspector and actions related to archaeology, and note that Baltimore City's status as a [Certified Local Government](#) qualifies it for grants to pursue some of these efforts. For more information, please contact me at [nell.ziehl@maryland.gov](mailto:nell.ziehl@maryland.gov).

We commend the plan's focus on and commitment to equity and sustainability, and we note that many of the recommendations listed intersect with [Heritage2031](#), the newly adopted statewide preservation plan. Specific comments follow below.

p. 151 - plan mentions "Heritage and Cultural Tourism" but not the Baltimore National Heritage Area. MHT recommends that this plan explicitly incorporate, by reference, the management plan of the Baltimore National Heritage Area. For sample language, or if you have any questions, please contact me.

p. 153 - Please clarify that the Maryland Inventory of Historic Properties (MIHP) is a list of potential historic resources, not properties "that have been determined historic." In some cases, these properties have been evaluated for eligibility in the National Register, but for the purposes of local planning, the MIHP is purely informational.

- In the section on federal inventories (the National Register of Historic Places and National Historic Landmarks), please clarify that impacts to these properties are

considered when state or federal – not just federal – actions (e.g. permitting, funding, etc.) trigger review. This review, led by the agency undertaking the action, involves MHT and local advocates, which can include CHAP, neighborhood organizations, and others. Considerations include, but are not limited to, design review. Please also clarify that these properties may qualify for state and federal historic tax credits; they will not always be eligible. In some cases, for example, changes to the property since the time of designation will render them ineligible.

p. 155, action 2.2 - Please change "Baltimore Heritage Area" to "Baltimore National Heritage Area."

Thank you again for the opportunity to comment on the plan. If you have any questions, I can be reached at [nell.ziehl@maryland.gov](mailto:nell.ziehl@maryland.gov).

Sincerely,

A handwritten signature in cursive script that reads "Nell Ziehl".

Nell Ziehl  
Chief, Office of Planning, Education and Outreach

Cc Rita Pritchett, MDP



**Draft Baltimore City Comprehensive Plan,**  
**Baltimore City**

**Maryland Department of the Environment – WSA/WPRPP**

**REVIEW FINDING: R1 Consistent with Qualifying Comments**  
**(MD20240604-0418)**

Please be advised, the property in MD20240604-0418 is in close proximity to Flood Zone A, AE (100-year Floodplain), VE, and X (500-year Floodplain). The project coordinator(s) should follow local floodplain ordinances and Federal Emergency Management Agency's guidelines and standards.

It is advised that the coordinator(s) consider climate resiliency, which could include but not limited to the following steps (<https://toolkit.climate.gov/>):

- Explore Hazards: Identify climate and non-climate stressors, threats, and hazards and how they could affect assets (people and infrastructure).
- Assess vulnerability and risks: Evaluate assets vulnerability and estimate the risk to each asset.
- Investigate options: Consider possible solutions for your highest risks, check how others have responded to similar issues, and reduce your list to feasible actions.
- Prioritize and plan: Evaluate costs, benefits, and capacity to accomplish each action integrating the highest value actions into a stepwise plan.
- Take action: Move forward with your plan and check to see if your actions are increasing your resilience with monitoring.

The coordinator(s) is advised to contact Dave Guignet, State National Flood Insurance Program Coordinator, of MDE's Stormwater, Dam Safety, and Flood Management Program, at (410) 537-3775 for additional information regarding the regulatory requirements for Floodplains and Storm Surges.

The coordinator(s) is advised to contact Matthew C. Rowe, CC-P, Deputy Director of MDE's Water and Science Administration, at (410) 537-3578 for additional information regarding Climate Change and Resiliency.

