



April 8, 2014

Mr. David Dorsey  
Planning Coordinator  
Allegany County Department of Community Services  
701 Kelly Road  
Cumberland, Maryland 21502

Dear Mr. Dorsey:

The Maryland Department of Planning has completed its review of the draft 2014 Allegany County Comprehensive Plan. As the enclosed written comments address in greater detail, portions of the draft Plan regarding the designation of growth areas and the provision of public services raise significant concerns. The Plan's inclusion of infill and redevelopment is a positive step. The draft represents a comprehensive update from the 2002 plan.

#### 1. Terrapin Run

The draft Plan designates the area of proposed Terrapin Run development within the Flintstone Planning Region as a new growth area. However, this area is rated as low suitability for development in the County's Land Suitability Analysis, and its inclusion as a growth area is inconsistent with the County's comprehensive plan policies related to encouraging new growth where infrastructure can support proposed development.

Several State agencies have noted in their comments the inconsistency between Plan policies and the designation of the Terrapin Run development area for growth. Specifically, the Maryland Department of Natural Resources (DNR) objects to designating the proposed Terrapin Run development as a growth area because it is located in a high quality water (Anti-degradation Tier II) catchment area, and may have negative impacts upon ground water withdrawals. The Maryland Department of the Environment notes that it has previously raised concerns about the availability of adequate groundwater in the area as necessary to support the proposed development. The Maryland Department of Transportation (MDOT) indicates that the Plan should identify the potential transportation impacts of the proposed development.

MDOT also states if the proposed Terrapin Run development would result in transportation impacts that require a major state highway improvement, an exception under the PFA law may be necessary prior to providing any state funds for preliminary engineering, right-of-way or construction.

Martin O'Malley, Governor  
Anthony G. Brown, Lt. Governor

Richard Eberhart Hall, AICP, Secretary  
Amanda Stakem Conn, Esq., Deputy Secretary

Mr. David Dorsey

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Other major concerns are that the proposed Terrapin Run development is not located within a Priority Funding Area; does not have available public water and sewer services; does not strengthen and direct development toward existing communities and infrastructure; does not provide for preservation of agricultural, farmland, sensitive areas, the Historic National Road, or open space lands; and does not promote infill development.

## 2. Projected Growth

The draft Plan's projections for the growth, supply, and demand for new housing units are not well-grounded. MDP's development capacity analysis estimates that there is sufficient capacity within the County's existing Priority Funding Areas (PFAs) to accommodate the County's projected growth to at least 2040. MDP estimates that there is the potential for approximately 8,000 new dwelling units inside the current PFAs, and the draft Plan states that there are 5,537 parcels with development capacity within existing PFAs. However, MDP projects that to accommodate anticipated growth the County will need only 2,250 new units between 2010 and 2040.

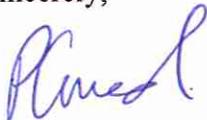
What's more, despite limited anticipated growth, the draft Plan proposes 30,000 additional units of capacity by designating new growth areas outside existing PFAs, where public infrastructure is inadequate to accommodate this scale of development. Additional development capacity should be limited and focused so as to promote the Plan's Land Use Goals of prioritizing new development in established urban areas so as to prevent leapfrog and scattered development patterns, which would result in the inefficient use of land.

## 3. Water and Sewer Plan

MDP has received the County's draft 2013 amendments to the 2011 Allegany County Water and Sewerage Plan, and note that plans for the Terrapin Run development are included in the draft, despite the previous disapprovals of those plans by the Maryland Department of the Environment.

Thank you again for the opportunity to review the draft 2014 Allegany County Comprehensive Plan. If you have any questions and/or require assistance, please contact the review coordinator David V. Cotton at 301-777-2161.

Sincerely,



Peter G. Conrad, AICP  
Director of Local Government Assistance

Attachments:  
MDP Detailed Review Comments

Mr. David Dorsey  
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MDP Septic Tier Letter  
MDP Water Resource Element letter  
Review comments from Maryland Departments of Natural Resources (2), Transportation (1) and Environment (2)

cc: Richard Josephson, Director, Planning Services  
David V. Cotton, MDP Regional Planner  
Rita Elliott, MDP Clearinghouse  
File



**Detailed Review Comments from the Maryland Department of Planning  
Draft 2014 Allegany County Comprehensive Plan  
April 4, 2014**

MDP has reviewed the Draft 2014 Allegany County Comprehensive Plan. In general, the Plan is clearly written, logically organized, thorough in its coverage of key topics, and contains an abundance of local historical knowledge. However, MDP is concerned with the estimated development capacities inside the designated growth areas, which are predicated under the Plan's proposed land use changes. Inclusion of the "Terrapin Run development" within the Plan is a cause for major concern. The following comments seek clarity, additional information, or potential changes to the Plan.

**General Comments**

The plan should strive to achieve a balance between supply and demand for future growth within growth areas. MDP's development capacity analysis estimates that there is more than adequate residential development capacity to accommodate projected growth within Allegany County's existing PFA, where there is potential for approximately 8,000 new dwelling units. The draft plan states in Chapter 11 that there are 5,537 parcels with development capacity within existing PFAs, and MDP projects that the County will grow by only about 2,250 units between 2010 and 2040.

MDP recommends correcting the statement on page 11-41 of the Plan referencing Terrapin Run and the adopted 2007 Water and Sewer Plan. The statement that "[d]uring the review and approval of the 2007 Master Water & Sewer Plan, the Planning and Zoning Commission reduced the scope of this development by nearly 80 percent (from 4,300 to 920 units) as stated in the current adopted plan," is misleading. The 2007 Water and Sewer Plan was, on several occasions, submitted to MDE for review, but was never fully approved. MDE approved the plan in part, disapproved the plan in part, and modified the plan in part. WSP Plan Sections 3.03.02 and 4.03.01 are not consistent with the County Comprehensive Plan, and did not include the requisite Anti-degradation Review.

Regarding the draft Plan's Water Resources Element (WRE), State law requires that a county's Water and Sewerage Plan be consistent with the county's comprehensive plan. We are concerned that the draft Plan does not address water and sewerage planning in a way that allows for a determination of consistency. Consistency is required when amending the County Water and Sewerage Plan and also when applying for federal and state funding.

**Detailed Comments**

**I. Demographic and Socioeconomic Data (Chapters 3, 4 and 10)**

In general, the draft Plan utilizes the latest available Maryland Department of Planning population, labor force and employment projections, and also makes use of information from the U.S. Census Bureau (Census 2010 and American Community Survey) and the U.S. Bureau of Labor Statistics (QCEW data). While use of the data from these sources is adequate for most planning purposes, the Plan would greatly

benefit if the data and analysis for Allegany County were placed in context with either statewide data or with other relevant counties. Better internal consistency of data sources is also suggested. Specific recommendations are as follow:

- **Distinguishing between household and group quarters populations over time would yield a more accurate portrayal of the total population change in Allegany County (Figure’s 3-1 and 3-2)**

Historic population trends are discussed on pages 3-1 and 3-2, where it is noted that “shifts in population continued throughout the subsequent decades until the population stabilized in 2000 and then slightly increased in 2010.” It should also be noted, however, the stabilization and growth in population cited in the Plan is in fact the result of growth in the group quarters population. Group quarters are places where people live or stay in group living arrangements in quarters owned or managed by an entity or organization. These are not typical household-type living arrangements. Services provided in these quarters may include custodial or medical care and other types of assistance, and residency is commonly restricted to those receiving services. People living in group quarters are usually not related to each other. Group quarters include places such as college residence halls, residential treatment centers, skilled nursing facilities, group homes, military barracks, correctional facilities, and workers’ dormitories.

The County’s household population, in contrast to the group quarters population, has continued to drop since the 1950s, although the decline in the 2000s (-1,600) was substantially less than in prior decades. Household population trends are briefly discussed in Section 3.4 of the draft Plan and should be incorporated into the overall population discussion.

Similarly, if possible, Table 3-1, Total Population by Planning Region, 1990 to 2010, should distinguish between household and group quarters populations, and evidence should be provided for the statement on page 3-3 that “[m]ost of the decreases with the exception of the Upper Potomac and Flintstone regions, are small and might be explained by the County’s population moving within the county from one region to another.” Particularly worthy of explanation is the assumed intra-county migration. Also, the heading of Section 3.2.1, “Population Projections by Planning Region,” should be changed, as the draft Plan includes no projections by planning region.

- **The aging of the population should be emphasized (page 3-4)**

While the draft Plan addresses the Baby Boomer generation, “...showing an increase only up until 2040 (sic)...” (should be 2030), it would be helpful to put the growth of the elderly population (ages 65+) in context with the overall population change by showing the share of the population over time expected to be ages 65+.

- **There is inconsistent terminology used in discussing the labor force (page 3-4)**

The draft Plan states that “[i]n terms of participation, more than half, 54.1 percent, of the potential labor force is currently employed, and this rate is projected to remain relatively constant.” This statement confuses the participation rate with employment. The participation rate is the share of the population ages 16 and over which is in the labor force, which is defined as being employed *or actively seeking work*. Thus, someone can be in the labor force *and* be unemployed. It would be helpful if the Plan presented data on unemployment trends in Allegany County and discussed these trends in context with the statewide and regional figures.

- **Distinguish between employed residents and jobs by place of work (page 3-5)**

The draft Plan states that “[a]s of 2010, the number of Allegany County residents employed was 34,240...[t]he following table breaks employment down by industry using NAICS standards.” The employment number refers to employed residents of Allegany County regardless of where they work, while the referenced table, Table 3-4, depicts the number of jobs located in Allegany County, without reference to where the job-holders reside. The two are not the same and should be better distinguished. Additionally, the “34,240” number should be sourced: MDP could not confirm this number for 2010 on the US BLS or the MD DLLR web sites.

- **Change title of Figure 3-4**

Figure 3-4, entitled “Household Population Projections,” has as a subtitle “(Owner & renter occupied).” These subtitle terms are typically associated with households, and not household population, and should be deleted to avoid confusion.

- **Table 3-6: Household Income discussion and tables are misleading**

Table 3-8 on page 3-9 depicts the median household incomes for 2010<sup>1</sup>, and 1999, and the discussion on page 3-9 states that “[i]n 1999, the median household income was \$30,910, which is significantly less than the estimated 2010 median household income of \$37,747.” However, the 1999 figure is not adjusted for inflation, and therefore provides little informational value. If adjusted for inflation, the 1999 median income in 2010 dollars is \$40,447, *well above* the 2010 value of \$37,747.<sup>2</sup> In addition, it would be helpful to compare Allegany County’s median household income, and change in median household income (in constant 2010 dollars), with other counties and/or the State to place the figures in some meaningful context. The statement on page 3-9 that “the median household income for 2010 is much less than the average household income,” and the discussion that follows, is not helpful in clarifying the County’s income characteristics. In most cases, average household income will be greater than median household income. It would be more helpful to put Table 3-7, “Average Annual Income,” which shows the percent of households who receive income by category, in some type of statewide or regional context. For example, it is hard to know the significance of the fact that 25 percent of Allegany County households receive retirement income, or that their average income is \$15,294, without some sort of comparison to other relevant areas.

Table 3-6, “Household Income, 2010,” on page 3-8, is also misleading in its comparison of the number of households by income class between 1999 and 2010. The discussion on page 3-8 notes those income ranges which have either more or less households in 2010 than in 1999. Without adjusting the 1999 household distribution for inflation, this discussion has little meaning.

- **Occupancy and Tenure discussion misses the point**

Table 4-1, “Occupancy and Tenure, 2000 and 2010,” on page 4-2, notes that the 2010 vacancy rate is higher than in 2000, but states that the 2010 vacancy rate of 12 percent “...is comparable, although slightly increased, to that of the 11% rate in 2000.” It then explains that “[a]t first glance, a high vacancy rate might appear negative, but the available vacancy rate of a housing market is a good indication of the

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<sup>1</sup> The data is actually for the period 2006-2010.

<sup>2</sup> Using the U.S. Census Bureau’s CPI-U-RS index for inflation and applied to the reported \$30,910 median for 1999 in Table 3-8. We also note that the Census 2000 SF3 table of PO53 reports that the median household income for Allegany County was \$30,821 in 1999, not the \$30,910 used in the Plan.

adequacy of the housing supply.” An increase in both the number and percent of vacant units (from 11.1 % in 2000 to 12.4% in 2010) *is* a negative and its implications should be further explored in the Plan.

- **There is inconsistency in ACS sources used for tables**

It appears that the data in Section 3, “Demographics”, that come from the American Community Survey (ACS), are uniformly derived from the 2006-2010 ACS and are sourced as such. Tables and data in Section 4, “Housing Element,” are derived from both the 2010 ACS (Tables 4-1, 4-3, 4-4, and 4-11) and the 2006-2010 ACS (Table 4-2), as well as the 2010 Census (Table 4-1 and 4-10). None are properly sourced. Where possible, the same vintage ACS data should be used throughout the report (e.g., use 2006-2010 or 2010 ACS tables throughout all sections but not tables from both).

- **The discussion of income for the elderly is partially incorrect**

On page 4-8 there is a discussion, referencing Table 4-11, of income estimates for householders over 65 years of age. The draft Plan states that “[t]he majority of this population group, 58%, is making less than \$30,000 annually [, which]...is about 20% less than the median household income for 2010.” This last statement is incorrect. Using 2006-2010 ACS data, the median income of the elderly is 71.7% of the overall county median (\$27,076 vs. \$37,747). Using just the 2010 ACS data, the median income of the elderly is 78.1 percent of the overall county median (\$27,363 vs. \$35,039).

- **Additional analysis on employment and jobs would be helpful.**

Approximately six pages of the draft Plan are devoted to a shift-share analysis of jobs in Allegany County over two different time periods. The results of shift-share analysis are highly dependent on the time periods used, and thus have limited interpretive value. It would be helpful if additional analysis could be performed on the annual change in jobs by place of work for Allegany County and a comparable set of counties over the last 10 years or so.

## **II. Land Use and Analysis (Chapters 4, 10 and 11)**

- **The methodology used for the Development Capacity needs to be addressed**

The draft Plan estimates that the development capacity inside designated growth areas will be more than 30,000 dwelling units under the proposed land use designation changes. MDP recommends that the County review its methodology in determining this capacity. The methodology does not appear to consider factors that impact development yields and result in a reduction of the residential density. Factors that will reduce residential yield of an area include non-residential growth in mixed use areas, site topographic constraints, roads, open space requirements, etc. This analysis should be redone to portray more accurate development potential in these areas. There should also be a more complete description of the new proposed land use and subsequent zoning changes. This will help the County complete a more accurate development capacity estimate. MDP can assist in this effort.

- **New “Future Land Use” categories should be described in more detail**

The County adds several new future land use categories to the draft Plan. It would be helpful to include more specific information about what is envisioned within these categories. What is the envisioned land use mix in each category? What portions of the areas are developable? Indeed, the descriptions in the draft Plan are very general, especially related to the “mixed use” designations.

- **The draft Plan should strive for a balance between development supply vs. demand**

On Page 4-7 the Plan states... “Residential development within PFAs may be decreasing due to the topographic challenge faced by all new development within Allegany County. It could simply be the case that much of the area within designated PFAs is already developed, and those areas that are designated as a PFA, but are not already developed, may be too steep for development (refer to Chapter 8: Sensitive Areas Element).”

MDP’s development capacity analysis estimates that there is more than adequate residential development capacity within Allegany County’s existing PFA to accommodate projected growth. MDP projections show that the County will grow by approximately 2,250 units between 2010 and 2040. MDP’s development capacity analysis shows that there is potential for approximately 8,000 new dwelling units inside the current PFA. In Chapter 11, the draft plan presents an infill analysis that suggests that there are 5,537 parcels within existing PFAs that have development capacity. Even if each parcel identified in the infill analysis only had capacity for one additional unit, this capacity represents more than twice the countywide projection for household growth. Additional development capacity should be limited at this time in order to promote the goals of the draft Plan, create internal policy consistency within the Plan, and to prevent leapfrog and scattered development patterns that result in the inefficient use of land.

- **Growth area changes should be clarified**

The draft Plan appears to include many changes to the County’s growth areas. These could add up to a significant change. It would be helpful for the County to provide more quantitative information about how large these changes are overall as well as a countywide map that illustrates the growth areas countywide. How many new acres of growth area are being proposed in the draft Plan? What future land use categories were these areas designated as in the 2002 plan vs. the draft 2014 plan?

The Greater Cumberland Growth Area depicted in the draft plan is significantly larger than in the previous plan. According to the development capacity figures associated with the planning area, this growth area alone can accommodate 3.5 times the total projected growth for the County. It appears that the plan is adding a significant amount of "Residential Estate" areas to this growth area, which has been characterized as low density residential in close proximity to natural areas. A better approach might be to focus growth on infill within Cumberland and within existing County PFA's in this region.

Section 11.6 Designated Growth Areas & Future Land Use, the Towns in the Georges Creek Region and Greater Cumberland Region have defined Municipal Growth Areas, it appears that many adjustments have been made to accommodate these areas within updated County Growth Areas. There should be a clear definitive boundary between a Municipal Growth Area and a County Growth Area. However, it does appear that the County has incorporated the Municipal Growth Areas from each municipality, where appropriate, into the County Growth Area.

The Growth Boundaries on (Maps 11-5, 11-7, 11-9 and 11-11) are difficult to understand due to the lack of a definitive boundary between the Municipal and County Growth Areas. The mapping should be revised to show a definitive boundary between these growth areas.

- **Areas Designated for Development Outside of Growth Areas**

It would be helpful to estimate development capacity for areas outside of growth areas that are being recommended for zoning changes to general urban classifications. There are several examples of this within the plan (Map 11-10: George’s Creek Proposed Zoning Amendments). What is the purpose of these potential rezonings, given that they are being classified as existing residential land use? The plan

designates a lot of future low density residential land use which is intermixed in farm/forest areas. Does this reflect more growth where it already exists or is the county anticipating large amounts of sprawl development?

- **Infill Development**

MDP is encouraged to see that County has recognized the importance that infill development will play in its future growth. The Housing element describes the need for modern and affordable housing. Are there any specific County programs and/or incentives that promote infill development? In many parts of the country, tax increment financing (TIF) is becoming an increasingly popular way to finance public investment and to stimulate private investment in infill or redevelopment areas. In some cases, adopting more flexible or less restrictive standards can allow infill development to go forward, where existing regulations discourage such development.

- **Terrapin Run, Section 11.6.7, Flintstone Planning Region, is inconsistent with LUE Goals**

Designating the area of the proposed Terrapin Run development as a new “growth area” is inconsistent with the Plan’s Land Use Element (the “LUE”), and the State Planning Visions and should be reconsidered.

First, Map 11-3, “Land Suitability Analysis Results,” depicts that most of the County’s major growth areas are located in areas that have higher suitability for development than does the area of the proposed Terrapin Run development. The County’s 2007 suitability study indicates that the area of the proposed Terrapin Run development, identified as a future growth area on Map 11-19, “Flintstone Future Land Use,” is less suitable for development. Thus, designation of this area as a growth area is inconsistent with Goal 3 of the LUE, which encourages new growth in areas where infrastructure can support development.

Second, public water and sewer services are unavailable. In this regard, MDP recommends correcting the statement on page 11-41 of the draft Plan which references Terrapin Run and the adopted 2007 Water and Sewer Plan. The statement that “[d]uring the review and approval of the 2007 Master Water & Sewer Plan, the Planning and Zoning Commission reduced the scope of this development by nearly 80 percent (from 4,300 to 920 units) as stated in the current adopted plan,” is somewhat misleading. The 2007 Water and Sewer Plan was, on several occasions, submitted to MDE for review, but was never fully approved. MDE approved the plan in part, disapproved it in part, and modified it in part. As submitted to MDE, WSP Plan Sections 3.03.02 and 4.03.01 were not consistent with the County Comprehensive Plan and did not include the requisite Anti-degradation Review.

Third, the proposed Terrapin Run development, which is not within a Priority Funding Area, is located on the Historic National Road Scenic Byway, and will potentially generate high volume of traffic. However, there is no mention in CAMPO’s 2012-2015 Transportation Improvement Program, the County’s 2012 Priority Letter to MDOT, the Allegany County 2011 Long Range Transportation Plan, or MDOT’s 2012-2017 Consolidated Transportation Program, of any highway improvements proposed for the Scenic Byway, US-40, from I-68 to Orleans Road North East. If the development results in impacts that require a major improvement of a state highway, a PFA exception may be necessary prior to the programming of funding for preliminary engineering, right-of-way or construction. We suggest that the County re-evaluate the development’s potential impacts to the local transportation network within this non-PFA area.

Fourth, the Plan should make a recommendation to preserve, protect and enhance the resources along the Scenic Byway, and on how development along the Scenic Byway should occur so as to be consistent with these goals. The County should adopt Context Sensitive Architectural and Site Design Guidelines for new development, redevelopment, and renovations along Scenic Byways, which stress maintenance of

context sensitive harmony and continuity along scenic byway corridors. Lastly, the Plan should recommend the adoption of zoning, subdivision, infrastructure, and related regulations to ensure that the Design Guidelines are consistently administered and adhered to throughout the Scenic Byway.

In sum, the proposed Terrapin Run development includes the following internal conflicts and inconsistencies:

1. The project area is not located within a Priority Funding Area.
2. Public water and sewer services not available.
3. The project does not strengthen and direct development toward existing communities.
4. The project does not provide for preservation of agricultural, farmland, sensitive areas, the Historic National Road, or open space lands.
5. It does not promote infill development policies.

### **III. Chapter 11: Land Use & Implementation Element – Minor Comments**

1. In Chapter 4 (Housing Element) 4.4.1 Priority Funding Areas, the figures in Tables 4.8 and 4.9 do not reflect MDP's published in/out of the PFA numbers. Also, please consider updating this table, as MDP has published 2 additional years of this indicator. The updated information can be found at:  
[http://planning.maryland.gov/msdc/PFA/Resid\\_Growth/by\\_County/PFA\\_cnty\\_index.shtml](http://planning.maryland.gov/msdc/PFA/Resid_Growth/by_County/PFA_cnty_index.shtml)
2. An excessive amount of acreage is devoted to accommodating future 2-acre lots.
3. Map 11-6 is missing the *Designated Growth Area* boundary.
4. Section 11.6.2, Page 11-22: The draft Plan states that "Large level parcels are not limited in Allegany County." This seems to be incorrect given the County's terrain.
5. Map 11-8: Two of the captions point to areas of potential zoning change from "A" to "I" in designated growth areas, but there do not seem to be any growth areas identified in that map.
6. All of the proposed zoning amendment maps should be reviewed to make sure that the arrows are pointing to the correct locations.

### **IV. Agriculture, Forestry & Non-Mineral Resources (Chapter 9)**

The goals for agriculture and forestry on page 9-1 are well defined. However, this Plan element could benefit from the following comments:

- **MALF program questions**

On pages 9-7 and 9-8, Section 9.2.3, in the discussions on the MALPF program, the draft Plan cites that 280,000 acres on 2,100 farms had been preserved as of the end of FY 2010. The figures for the end of FY

2013 are 285,902 acres on 2,102 farms. However, Allegany County has preserved just 803 acres through MALPF, least of any county in the state. The plan should mention this and note any potential for improving the pace of easement acquisition. Based on the FY 2013 farm number, MALPF will acquire two more easements in the county this year. Does the County anticipate that this will be a trend?

On page 9-8, the draft Plan says that “the State of Maryland, with the work of the Foundation and its State and local partners, has preserved in perpetuity more agricultural land than any other state in the country.” When one considers MALPF, Rural Legacy, MET, local PDR/TDR, and other programs together, Maryland does lead with over 800,000 acres under easement.

- **Allegany County forested acreage needs to be quantified with DNR**

The number of acres of forest in the County appears to be in dispute. The draft Plan notes that “[u]sing planimetric photography from 2005, the County GIS office estimates that there is now approximately 204,700 acres of Forest covering more than 75% of the land in the County.” However, on the same page, the draft Plan states that “[i]t should be noted that although the Land Use Survey performed by Allegany County indicates that approximately 62.5% or 171,811 acres of the land area within Allegany County is forested, this Land Use data does not realistically depict the true extent of forest in Allegany County.”

The acreage figure must be corroborated more precisely because it has important implications for Allegany County. As Mr. Hedderick, a Project Forester for DNR Forest Service indicates (comments attached), Allegany County must contain over 200,000 acres of forest if it wishes to remain exempt from the Forest Conservation Act.

Further, on Page 9-9, the draft Plan states that “Maryland is [annually] converting 25,000 acres of agricultural and forest lands to development.” This may be the conventional wisdom, but the figure is too high. Acres subject to ag land transfer tax—i.e., farm and forest land to be developed—totaled under 20,000 acres for the past six years *combined* (FY 2008-2013). The last time that the number exceeded 25,000 was in 1990.

- **Map 9-7 is difficult to read**

On Page 9-17, it’s impossible to distinguish among the different shades of brown and tan used on map 9-7. It might help for the map to be bigger and to use more distinct colors. Perhaps some of the soils can be consolidated into larger groupings.

- **Comments for Goals, Objectives and Recommendations**

Page 9-19 of the draft Plan recommends that “fees and other financial mechanisms...support prime agricultural land preservation efforts and create a disincentive for unnecessary conversion of prime agricultural land.” Specifics would be welcomed here.

The draft Plan recommends certification of the county’s farmland preservation program. This is a good idea, but it is not likely to generate much funding due to the small amount of land subject to agricultural land transfer tax in Allegany County. Since 1990, the average has been 267 acres per year. Since 2000, the average has been 204 acres.

## **V. Economic Development (Chapter 10)**

The Economic Development goals and recommended actions are well defined. However, this Plan element could benefit from the following comments:

- On page 10-1, Ecosystem Services are mentioned as an opportunity that is currently not being recognized. However, this section, and the rest of the document, does not detail how ecosystems services can be used further, presumably to preserve farm and forestland and to inject easement funds into the local resource-based economy. These markets are still embryonic, so the plan may not be able to elaborate much on the topic. It might help to refer to DNR's *Ecosystem Services Working Group Final Report*:  
<http://www.dnr.state.md.us/dnrnews/pdfs/ESWGFinalReportOct2011.pdf>
- On page 10-9, business attraction, retention, and expansion section, the goals and recommended actions are good, but what about business startups? Cumberland has become home to a number of artists and craftsmen; can more such businesses get started in the county and, with Cumberland's existing businesses, create an agglomeration effect to attract more businesses, customers, and visitors?
- More potential for the creation of businesses lies in the food systems, as discussed in the ARC report *Assessing the Landscape of Local Food in Appalachia*:  
<http://www.arc.gov/images/programs/entrep/AssessingLandscapeofLocalFoodinAppalachia.pdf>
- MDP does not suggest replacing efforts with established big and growing employers, but there might be a place for food business incubators, such as commercial kitchens where various entrepreneurs can use the facilities to perfect recipes, products, and packaging. A search of the 2012 Allegany County Economic Development Plan did not show any policies relating to "agriculture" or "farming." Results for "food" policy references consisted of fast food restaurants and supermarkets. The plan might consider recommending an agricultural marketing/business development specialist in the department of economic development.
- The emphasis on providing infrastructure for businesses and outdoor recreation for employees is good. The County might also benefit from the cultural and social attributes that help cities attract modern, well-paying businesses: "talented workers, and the quality of life that the educated and ambitious have come to expect—not the low-tax, favorable-regulation approach that many state and local government tout." ("What Cities Really Need to Attract Entrepreneurs, According to Entrepreneurs," by Richard Florida, in *The Atlantic Cities*, February 11, 2014.  
<http://www.theatlanticcities.com/jobs-and-economy/2014/02/what-cities-really-need-attract-entrepreneurs-according-entrepreneurs/8349/> )
- The Plan should say more about how Frostburg State University can assist Allegany County with its economic development activities. At the very least, the University could assist in establishing some of its functions and residences off campus and work with the County on providing housing and other amenities to keep recent graduates in the area. A food-related project of the University and numerous partners, Frostburg Grows, won a 2014 Sustainable Growth Award. Frostburg Grows successfully converted unused mined land to a five-acre greenhouse and shade house complex for raising produce and tree seedlings, and provides job training and creates entrepreneurial opportunities.

## **VI. Transportation (Chapter 5)**

The transportation section addresses clear goals and objectives while providing a comprehensive inventory of existing transportation plans, policies, and priorities.

MDP commends the County's desire to improve bicycle and pedestrian mobility, while at the same time providing economic development opportunities (e.g. eco-tourism). The Plan's focus on encouraging non-motorized transportation through the construction of future on and off-road facilities will help to reduce traffic congestion, greenhouse gas emissions and costly wear and tear on road and bridge facilities. The inventory of existing and proposed transportation routes mapped by mode, and the map illustrating the improvement projects by planning region, are easy to read and provide clear direction regarding the County's transportation priorities.

MDP appreciates the Plan's inclusion and discussion of a Complete Streets concept and parking management strategy. We encourage further development of a local complete streets policy in order to provide greater transportation options for automobile, bicycle and pedestrian travel.

The proposed Terrapin Run Development illustrated on map 11-19 and discussed on page 11-41 would potentially generate a large amount of traffic from approximately 920 residential units located outside of a Priority Funding Area. There is no mention of any highway improvements proposed on US-40, from I-68 to Orleans Road North East, in CAMPO's 2012-2015 Transportation Improvement Program, the County's 2012 Priority Letter to MDOT, the Allegany County 2011 Long Range Transportation Plan or MDOT's 2012-2017 Consolidated Transportation Program. We suggest the County re-evaluate the development's potential impacts to the local transportation network within this non-PFA area.

The zoning amendments as illustrated in map 11-6 appear to illustrate two large areas which are much larger in size than the Designated Growth Areas along US-220. Although the map specifies the zoning changes are located within a Designated Growth Area, the map does not include a growth area boundary. The County should revise the map to include the Designated Growth Area boundary, Priority Funding Area boundary along with the proposed zoning amendments all on one map. This will allow readers to clearly see where the zoning amendments are occurring in relation to the Designated Growth Areas. The proposing zoning changes along the US-220 corridor are near or within the Allegany County's Mountain Ridge Rural Legacy Area, which is an environmentally sensitive area. Planned growth in this location should be closely coordinated with the Maryland Department of Natural Resources.

The proposed zoning amendments illustrated in Map 11-6, page 11-17 along the corridor will require obtaining water and sewer permitting for development in the proposed "General Urban" zone. We recommend you coordinate with MDP and the Maryland Department of the Environment to ensure the proper public facilities are provided.

MDP participates in the Tier One NEPA Project Planning Study for the US 220 Project. We have been working with MDOT in coordination with the County to address potential smart growth and land use impacts of the project. We encourages the County to focus growth in designated nodes/areas while minimizing strip residential and commercial developments and project agricultural and environmentally sensitive lands along the US 220 corridor. We appreciate that the future growth areas along the US 220 corridor designated by this draft plan closely follow the Priority Funding Area boundaries. The US 220 Project is subjected to the Priority Funding Law compliance requirement. We look forward to working with the County and MDOT on future phases of the US-220 project planning study to examine potential transportation and land use impacts and address short-term or long-term transportation strategies that would support smart growth while minimizing potential adverse growth and land use impacts along the corridor.

## **VII. Water Resources**

- **Allegany County growth tier map**

As noted in MDP's January 24, 2013 letter to Allegany County, the Allegany County growth tier map, now incorporated into the County's comprehensive plan, violates the statutory requirements of the Land Use Article, Section 1-508, because it maps the proposed Terrapin Run development area as a Tier II planned growth area (see attached letter).

- **Water Resources Element**

State law requires that a county's Water and Sewerage Plan must be consistent with the county's comprehensive plan. We are concerned that the draft Plan does not address water and sewerage planning in a way that allows for a determination of consistency. Consistency is required when amending the County Water and Sewerage Plan and also when applying for federal and state funding.

On Pages 1-3 and 1-4, the draft Plan states that the Water Resources Element (WRE) has been incorporated in this Plan, but the draft does not go far enough in order for State agencies to determine consistency. MDP recommends that the County address this concern by including an updated WRE in the comprehensive plan, either as its own chapter or as an appendix.

The purpose of the WRE is to ensure that the proposed land use plan can be supported given water resource constraints. The 2010 WRE is incomplete and should be updated. As noted in MDP's January 26, 2011 comments (see attached) on the draft WRE, the County did not include a nutrient pollution impact analysis of the land use plan. In response, the County included in its adopted WRE a forecast of future septic tank pollution impacts resulting from the 2002 land use plan; however, this does not fully capture the receiving water impacts resulting from future land consumption. To do so, the As part of the Allegany County comprehensive plan update, the County should analyze the stormwater, septic tank, impervious cover and forest cover impacts for at least two alternative land use plan scenarios, and should choose the least impactful scenario as the draft land use plan. In addition, the County should complete a review to first determine whether the water and sewer and pollution and/or natural resource impact demand analysis found in the 2010 WRE is still valid and adequately represents the impacts demands of the draft land use plan. If it is determined that the WRE does not adequately represent the water and sewer impacts demands of the draft land use plan, the water and sewer sections of the WRE should be updated. If Based on the analysis and review, if the updated WRE demonstrates that water resources will constrain the ability of the County to implement the draft land use plan, the County should include recommended strategies in the WRE for addressing those constraints (expanding WWTP capacity, minimizing future nonpoint source pollution, etc.) and/or should revise its land use plan to limit future impacts and demand. The 2014 Allegany County Comprehensive Plan should not be adopted before the above analysis and review is completed. A summary of this the analysis and review should be discussed in the 2014 Allegany County Comprehensive Plan. Also, please consider addressing consider MDP's other comments on the draft 2010 WRE, which are attached when completing this update. The adopted WRE is mentioned in several locations with the Plan (pages 1-4, 2-3, 6-3, 7-16 and 7-17). Please make sure the adoption dates and the year of the current WRE are consistent throughout.

As mentioned above, MDP recommends correcting the statement on page 11-41, which references Terrapin Run and the adopted 2007 Water and Sewer Plan. The statement that “[d]uring the review and approval of the 2007 Master Water & Sewer Plan, the Planning and Zoning Commission reduced the scope of this development by nearly 80 percent (from 4,300 to 920 units) as stated in the current adopted plan,” is somewhat misleading.