



Maryland Department of Planning

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August 6, 2010

Ms. Brenda Dinne, Chief, Bureau of Comprehensive Planning
Carroll County Department of Planning & Zoning
225 North Center Street
Westminster MD 21157

Re: 2010 Master Plan: Carroll County Challenges & Choices

Dear Ms. Dinne: *Brenda*

Thank you for submitting the draft 2010 Master Plan: Carroll County Challenges & Choices to the Maryland Department of Planning (MDP) for our review.

Please do not hesitate to contact me or Jenny King at 410.767.4500 should you have any questions.

Sincerely,

Peter G. Conrad, AICP
Director of Local Government Assistance

Enclosures: MDP Comments on the 2010 Master Plan, MDOT, MDA and DBED Comments

cc: Steve Horn, Director, Carroll County Planning & Zoning
Jenny King, Regional Planner
Rich Josephson, Director, Planning Services
Rita Elliott, MDP Clearinghouse
File



Maryland Department of Planning
Comments on the 2010 Master Plan: Carroll County Challenges & Choices
August 6, 2010

General Comments

The Maryland Department of Planning commends the inclusion of a review of the existing state planning enabling law and the incorporation of the twelve state planning visions within the 2010 Master Plan. The plan structure is very accessible to the reader with the inclusion of goals, challenges, choices and fiscal impact into each chapter. There are several chapters, as noted below, where the presentation of data could be improved through citing sources and explaining inconsistencies where they exist. It would be helpful to include large scale maps that show more detail of complex or pertinent areas so that the features may be clearly seen. The plan could also provide additional explanation about the relationship between the recently adopted Water Resource Element (WRE), Community Comprehensive plans (formerly known as “environs plans”) and the 2010 Master Plan.

Chapter 2: Past, Present and Future Trends

Population

There are several cases where demographic data is either inconsistent or the source is not cited. The Plan cites population estimates for 2008 (174,650), 2025 (200,000) and a 2038 build out (218,677).¹ Although no source is given, these number appear to be from the Carroll County Department of Planning and have also been used in the Cooperative Forecasts of the Baltimore Metropolitan Council for transportation planning purposes. These figures indicate that the County has additional capacity for 44,027 (44,027 is the 2008 estimated population of 174, 650 - minus the 2038 build out population estimate of 218,677) people. However, on page 95 of the Plan (Chapter 14) it estimates a build-out population of 267,629 which would be an additional capacity for 92,979 people. While the Plan does not indicate a year for the 267,629 figure it creates confusion and inconsistency in the Plan.

Additionally, based on the estimated housing unit capacity of 19,794 (page 22) these figures would equate to an average household size of 2.22 or 4.69 based on 267,629. There is a significant difference in these figures. Further, page 95 states that the 267,629 equates to 91,074 housing units or a household size of 1.02. MDP projections estimate an average household size of 2.65 in 2030. It would be helpful if a discussion were provided on how these figures were derived and what each actually represents. Possibly including a table of the population, household and capacity figures for the time periods would be helpful. It was

¹ Page 20 for the 2008 estimates and page 21 for the projections.

difficult to discern which figures were to be considered in our assessment since the numbers on pages 20-21 and 95 did not coincide and gave different outputs.

The Plan states on page 94 (Chapter 14), that there is “slightly less than half of all estimated remaining zoning capacity in the DGAs,” leaving approximately 13,165 units to be developed in the rural parts of the county. If there is currently capacity for 19,794 units in the County and 13,165 or 66.5% of that capacity is going to be built outside of DGAs, only 33.5% would be built in DGAs. If these figures are interpreted correctly this would indicate a significant decrease in the number of units going into the growth areas in the future.

We recommend that the plan incorporate and discuss growth in and out Priority Funding Area in the context of the new Annual Report requirements (HB295). The allocation of expected growth would benefit from being placed in a summary chart which clearly lays out the many different controls used to determine future growth (i.e. population, build-out and household size to name a few).

It would be helpful to include a map showing how the County Growth areas relate to Municipal Growth Areas. Also it would be helpful if the Plan mentioned if the population and housing unit capacity figures from these Plans were also incorporated. Possibly include a chart of relevant figures. This may be helpful as it relates to build out in the County and future recommendations for increasing capacity. For example is the current capacity figure for future annexation areas based on County zoning or future municipal zoning densities?

The Plan highlights the need to provide more diversified zoning allowing for denser/mixed use types of development. Has the County reviewed the municipal plans for these types of recommendations or policy considerations? It may be helpful to include some of these as examples in the County plan and address how these may possibly impact housing unit capacity or service demands.

Projections for 2030 of the elderly population (43,500) and school-age population (42,940) are given on page 21. No source is cited for these projections, but they appear to come from the Maryland Department of Planning (February 2009).² However, these age-related projections are actually for different control totals published by MDP and should be adjusted to match the projected totals used in the Plan.³ While this is a minor data inconsistency (mixing age-related data with different total projections) that should be addressed, the Plan is right in recognizing that the future will bring the County relatively large cohorts of both the young and the elderly. However, the Plan does not address the consequences of this demographic dynamic, particularly relating to the provision of housing, transportation and other services that would be needed for the County’s elderly population two decades hence.

² <http://planning.maryland.gov/MSDC/County/carr.pdf>

³ MDP’s Carroll County projection for 2030 is 210,700, compared to Carroll County’s RND 7B projection of 207,300.

Employment

The employment totals used in the Plan are not consistent throughout the document. This inconsistency seems to be due mostly to the use of multiple sources of employment data and not fully understanding what is being covered. On page 23, the following totals for full and part-time employment are given: 1969 (27,424), 1990 (53,109), 2005 (76,308) and projected 2030 (90,300). No source is given for these numbers, but the historical data appears to be based on (a slightly modified) U.S. Bureau of Economic Analysis data set. In and of themselves, the projected growth between 2005 and 2030 (14,000, or 18.3%) appears to be on the low side, particularly given the desire of the County to increase its industrial and commercial assessable tax base.

On page 43 (Chapter 7), an employment total for 2008 is given as 57,082, (with, “ an increase of 7,020 since 2002”), while on page 44 it states, “Based on the emerging economic opportunities identified by the study, it was concluded that jobs in Carroll County could increase from about 80,000 today to 120,000 by 2030.”⁴ The 2008 employment number (57,082) on page 43 is wildly inconsistent with the “80,000 today” figure on page 44 and the 76,308 total on page 23. The reason for these differences is that the 57,082 total represents non-agricultural wage & salary employment only, while the 80,000 total, which seems to be a modified BEA number, includes both wage and salary employment and also employment for the agricultural sector, the military (including the National Guard) and most importantly, some measure of the self-employed (proprietors).⁵

Also note that the 2030 total of 120,000 on page 44 is not consistent with the 90,200 for 2030 on page 23, and does represent a substantial difference in the outlook for the employment growth (i.e. a 50-percent increase over the 2005 to 2030 period as opposed to an 18.3 percent increase in the lower employment data set). While the 18.3 percent increase appears to be on the low side, the 50 percent projected gain would seem to be overly ambitious.

In addition to the inconsistencies with the employment data, there are some minor errors in the use of labor force and commuting data. On page 23 the Plan says, “In 2000, an estimated 34,804 county residents in the workforce worked in the county, while 39,915 Carroll residents left the County for employment elsewhere.” The 39,915 number cited represents those County residents who work elsewhere in Maryland. If County residents who work out of state are also included (and they should be), the true number who leave the County (in 2000) is 42, 788.

On page 43, the Plan states, “Only 40 percent of the resident labor force in 2000 (50,062 people) worked in the County. Since the number of people in the labor force has been almost twice as many as the number of jobs created in the County since 1990, it can be assumed that the percentage of residents working in the county has not substantially increased.”

⁴ The study cited was conducted by Parsons –Brinkerhoff in 2007.

⁵ The source of the non-agricultural wage & salary employment data is Quarterly Census of Employment & Wages (QCEW) published by the Maryland Department of Labor, Licensing and regulation.

All of the numbers cited in the paragraph above are incorrect. In 2000, the labor force in Carroll County was 80,767. A total of 34,804 residents worked in the County in 2000, or 43.1 percent. It is difficult to pinpoint the relationship between labor force growth and job growth since 1990 because of the various employment numbers used, but labor force growth between 1990 and 2008 is roughly 27,800, while job growth has been around 30,000 depending on the source used, so the relationship between the two is nowhere near a two to one ratio.⁶

While the data cited in the Plan on commuting and labor force growth needs to be corrected, the issue of commuting outside of the County for work, and the generally long commuting times is a valid one that can be addressed with a better balance between residential and non-residential growth, which the Plan acknowledges.

Schools

The Plan is consistent with the 2010 Educational Facilities Master Plan. However, it should be noted that the approved 2010 through 2019 enrollment projection data for Carroll County Public School System signifies a slight decrease in enrollments than what is reflected in the County's Master Plan. According to MDP's supporting documents, it is anticipated that by 2018, there will be 26,403 full-time students attending school in Carroll County. Additionally, it is anticipated that the 2010 pupil population will be at or near 27,253 for the 2010 school-year and 26,421 for the 2019 school-year.

We recommend that school boundary maps be included in the Plan. The maps should display the location of the existing schools as well as future planned schools. It would also be useful if the Plan included tables indicating the schools current and seven (7) year projected enrollment and school facility capacity data. This information could be used as another tool to assure that collaboration with the local educational agency continues.

Chapter 6: Community Involvement

The policy at the top of page 41 and Recommendation "E" requires further explanation- what are "those comprehensive plans"?

Chapter 7: Employment/Economic Development

Page 44 notes the 2007 study completed by Parsons-Brinkerhoff. Consideration should be made to discuss how the Carroll County Planning Department has taken the 2007 data and have modernized it for use in the Master Plan.

Page 45- The Table uses 2000 Census data. Didn't the Parsons-Brinkerhoff study update this information?

Chapter 8: Environmental Resources

⁶ About 33,500 if U.S. BEA data is used for 1990 and 2008 – which would show the largest change among the different data sources.

Page 50 discusses Sensitive Areas. The following bolded text should be included in the Plan. Sensitive Areas include: streams and their buffers, wetlands and **their buffers**, 100-year floodplains, habitats of threatened and endangered species, steep slopes, agricultural and forest lands **intended for resource protection or conservation and other areas in need of special protection.**

On page 65 there is a reference that in 2004, seven environmental ordinances were either adopted or updated but only one is specifically mentioned. A brief synopsis of the other six would bring the reader of the Master Plan up to date.

Page 67 notes the Clean Cars Act- how is the County involved in this legislation?

Chapter 9: Facilities & Services

Page 71 of the Plan notes that the Water and Sewerage Plan is a tool to implement the Master Plan. The County is to be commended for emphasizing this connection.

Chapter 17: Priority Preservation Area

As a County whose farmland preservation program has been certified by MDP and the Maryland Agricultural Land Preservation Foundation (MALPF), Carroll County is required to delineate a Priority Preservation Area (PPA) and include a PPA element in its comprehensive plan.

The PPA/PPA Plan Element

The PPA element describes the process that the County used to arrive at the boundaries of the PPA. The PPA boundaries make sense and are clearly tied to the County's goals for agriculture. The PPA contains 92,909 acres. Of that, 9,477 acres are developed and another 2,696 are used for roads. That leaves 80,736 undeveloped acres in the PPA. The preservation acreage goal in the PPA is 64,589 acres, which is 80% of the undeveloped land. "Undeveloped" is defined "as the combination of unimproved properties and improved properties comprised of 10 acres or more" (page 109). Of those 64,589 acres, 37,986 acres lie under permanent easement already, and (non-permanent) preservation remainders resulting from subdivision comprise another 4,583 acres. The preservation acreage goal for the entire county is 100,000 acres. At current rates of preservation, the County will need 25 years to reach this goal (though page 35 says 19 years). That easement acquisition rate can be accelerated through the use of a new tool: Installment Purchase Agreements, which were first used in 2009 in Carroll County.

The County is a leader in land preservation: it has placed almost 55,000 acres under easement as of July 2009 through MALPF, MET, Rural Legacy, Carroll County Land Trust, and the County's own PDR program.

The PPAs Policies and Recommendations

These are good, especially the recommendation “to offer a residential lot in exchange for a permanent preservation easement to owners of remaining portions outside DGAs.” These remainders, which could potentially be rezoned, contain 13,656 acres, so permanently preserving them is a good idea. However, it would be nice to know how many remaining portions—and therefore how many extra houses—there are.

Another good idea is the expansion of the Upper Patapsco Rural Legacy Area “after the Finksburg Corridor Plan is adopted.” This year the County did apply to the Rural Legacy program for an expansion of the Upper Patapsco RLA. The Rural Legacy Board approved the expansion. The County’s other Rural Legacy Area, Little Pipe Creek, was also expanded.

The PPA element should include the program evaluation—and accompanying data—that the County included in its application for recertification. A seamless cut and paste from one document to the other should suffice.

On page 33 the plan cites the Census of Agriculture that the County lost 1,825 acres of farmland per year between 1997 and 2007. However, figures from the State Department of Assessments and Taxation for the number of acres subject to agricultural land transfer tax during that period is just 1,163 per year for Carroll County. The acres subject to agriculture transfer tax may be considered a more precise measure since they are permanently taken out of production. Since this data show a significantly less decline than the land in farms from the agricultural census, the rate of land conversion in Carroll County may not be as great.

Concentrations of easements exist outside the proposed PPA, so the plan should describe the strategy for their preservation. For example, will the Upper Patapsco RLA, which is outside the PPA, become the County’s priority for Rural Legacy funds instead of the Little Pipe Creek RLA, which is inside the PPA?

Comparisons to the Previous “Pathways” Draft

It appears that a separate 126,983-acre natural resource PPA, proposed in “Pathways,” has been dropped from this Draft Plan. Though this draft Master Plan recommends a residential lot in exchange for permanent preservation of remaining portions—a good idea, as noted above—the “Pathways” draft specified that remaining portions be at least 25 acres. That specification is not in this Plan, thus potentially opening the way for more houses in rural areas if small remaining portions receive lot rights.

The “Pathways” draft recommended that the 1:3 conservation zoning be changed to 1:20, while the current draft recommends more protective zoning without specifying a density. It is doubtful that the new zoning will be better than 1:20, so it’s unfortunate that the earlier recommendation was removed.

Chapter 19: Transportation

The Plan should describe the proposed roadway projects shown on the maps from pages 119-123 under the challenge to Carroll County section. This description may include the types of improvements proposed, planned implementation time-frame, funding sources, and priorities of these projects. It is assumed that the County’s Community Comprehensive

Plans also include details of the projects including the purpose and needs of the projects. Additionally, the maps on pages 119-123 would benefit from showing the PFA boundaries which show the eligibility of projects funded by the State.

MDP strongly recommends that the County include the following items from the transportation element of the early version of the draft County Comprehensive Plan, 2009 Pathways to Carroll's Future: creating complete streets, creating walkability to reduce auto trips, providing multi-modal transportation infrastructure and expanding the existing transit service, which are good items not to be missed.

Manchester Bypass (page 120)

While a bypass may help to divert through traffic out of a main street area, it may also attract unintended development pressure along the bypass corridor and areas beyond where the Town and the County do not envision future growth. These potential secondary land development impacts may potentially dampen the benefit that a bypass may provide in a long run. This will be a critical balance that the Town and the County should assess.

The proposed bypass would also be outside the Priority Funding Area for which a major transportation investment will be evaluated for its consistency with the State's planning policies. There are examples where localities and state transportation agencies work together to address through traffic impacts on main streets by implementing traffic speed controls and other measures, such as building more connected local streets and roads. The streetscape project on MD 30 improved the main street transportation environment. Should further transportation measurements on existing roadways or transportation and land use strategies could be done to address traffic problems on the main street, the State would welcome discussing with the Town and the County.

The transportation element also should have more detail on pedestrian/bike plan and transit plans. Only the pedestrian/bike plan was recommended briefly.

Chapter 20: Water Resources Element

The following comments are related to the consistency of the draft Carroll County 2010 Master Plan with the adopted Carroll County Water Resources Element (WRE):

- The Carroll County WRE should be revised to reflect the water and sewer demand and non-point source pollution expected from implementation of the draft Carroll County 2010 Master Plan (at build-out or through the planning period used in the Master Plan). If the forecasts will require different solutions to address water resource needs, then the Carroll County WRE should be revised to include those solutions.
- The Carroll County 2010 Master Plan should indicate whether or not the forecasts of water and sewer demand and non-point source pollution in the Carroll County WRE are adequate representations of the water resource impacts expected from implementation of the Carroll County 2010 Master Plan.

- The Carroll County 2010 Master Plan should indicate whether or not the solutions to address water resource needs listed in the Carroll County WRE will be adequate to support implementation of the Carroll County 2010 Master Plan.