



Maryland Department of Planning

Martin O'Malley
Governor
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Richard Eberhart Hall
Secretary
Matthew J. Power
Deputy Secretary

August 8, 2011

Mr. Bruce R. Dell, Planning & Zoning Administrator
City of Brunswick
1 West Potomac Street
Brunswick MD 21716

Re: City of Brunswick 2010 Master Plan Update

Dear Mr. Dell: *Bove,*

Thank you for submitting the City of Brunswick 2010 Master Plan Update to the Maryland Department of Planning (MDP) for our review.

Again, thank you for the opportunity to review and comment. Please do not hesitate to contact me or at 410.767.4500 should you have any questions.

Sincerely,

Peter G. Conrad, AICP
Director of Local Government Assistance

Enclosure: Comments on the City of Brunswick 2010 Master Plan Update, MGE Checklist, Population Charts, MD Department of Transportation comments

cc: Eric Soter, Director, Frederick County Planning & Zoning
Rich Josephson, Director, Planning Services
Dave Cotton, MDP Regional Planner
Rita Elliot, MDP Clearinghouse
File



**Maryland Department of Planning
Comments on the City of Brunswick 2010 Master Plan Update
August 8, 2011**

Environment and Sensitive Areas

Article 66B as amended by HB1141 also included some changes to the Sensitive Area Element. This chapter should note the direct Article 66B reference as Section 1.00(j) which lists the requirements of a Sensitive Areas Element. The revised requirements now include:

- Streams, 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 as determined in the Plan.

These new requirements (capital letters) along with the existing ones should be included and addressed accordingly.

Municipal Growth Element

Population Projections

On page 11, the Frederick County 2010 population cited (235,364 persons), is from the Frederick County Comprehensive Plan. Since the census population count of 233,385 for 2010 is available it should be used instead. This reduces the average annual net increase in population for the County from 4,240 to 3,811 persons.

On page 14, the increase in Brunswick residents from 1960 through 2010 is listed as 2,329 persons. This should be changed to 2,315 persons.

The last paragraph on the page seems to state there has been no increase in the number of single person households in Brunswick. The Plan states, "... roughly similar amounts being reported for 1990, 2000 and 2010." Census counts of single person households for the period show that the 1990 count is 36.81 percent higher than the 1980 count of single person households, the 2000 count is 12.18 percent higher than the 1990 count, and the 2010 count is 13.12 percent higher than the 2000 count. These counts are 288, 394, 442 and 500 single-person households, respectively.

On page 17, the Plan states that married couple families accounted for 50.4 percent of all family types in 2010. We believe this is meant to read 50.4 percent of all household types. The 2010 count of 1,112 married couples is 73.40 percent of all family types. It also accounts for 51.6 percent of all Brunswick household types instead of the 56-percent shown.

Our review of the population projections for Brunswick city used in the Plan, leads us to conclude that the projection for the 2030 period is high, considering the city's historic population levels and current demographic trends.

The Brunswick Plan assumes a 2.8308 annual average growth rate through the 2010 – 2030 period. This yields a household population total of 10,259 persons by 2030, an increase of 4,389 persons (75-percent) from the 2010 Census count of 5,870 persons.

Attached is Table 1. Population Trends for Brunswick City and Specified Areas. This table displays and analyzes the change in population for the three most recent censuses for Brunswick, Frederick County and the State of Maryland.

The data show significant population growth for Frederick County over the past 20 years. From 1990 through 2010 Frederick County's population increased by 83,177 persons or about 55-percent. Brunswick, while experiencing substantial population growth over the period (753 persons or 15 – percent), has not come close to approaching the rates of growth elsewhere in the county.

The recommended MDP projection for Brunswick City (see Table 2. Summary of Population Projections for Brunswick and Specified Areas) has an annual average growth rate of 1.8767. This growth rate is much higher than what is projected for the State, and slightly higher than what is projected for Frederick County. This projection yields a population of 8,514 persons by 2030 for a net increase of 2,644 persons, and increases city inhabitants at more than twice the rate experienced from 2000 through 2010.

While we agree with the Brunswick Comprehensive Plan that the City should expect to experience population increases at a level that surpasses the 1990 through 2010 period, we believe the Brunswick Comprehensive Plan's population growth projection over estimates the expected increase.

Development Capacity Analysis

The Plan, as written, has an excess supply of developable land. According to the capacity analysis, there is room for 6,113 people within the City limits and another 6,926 people within Brunswick's Growth Areas. The City is estimating to grow by roughly 4,100 people by 2030 but has enough land for a potential 5,015 households or 13,039 people in 20 years.

In the context of planning for development, it is important to strive for a balance between land supply and demand for future growth.

- Provide too little land for development (be it on greenfields, redevelopment or infill), and the land cost will become too high or development may spill over to adjacent jurisdictions.
- Provide too much land for development and it will tend to be used inefficiently. In addition, plans and growth controls will be marginalized because there are an abundance of locational options for each new development.

Community Facilities

HB1141 requires municipalities examine public services and infrastructure in relation to future demand. We commend Brunswick for including a Community Facilities section, however more detailed information is required in some areas. For example, the Plan states that a short-term recommendation has been made to include additions in staff to meet the population increase. How many staff members? How many part-time, full-time? What is the ratio of officers to population? A

discussion of how future growth impacts these community facilities at build-out needs to be included on schools, library, public safety, medical response, police, fire, water facilities, sewer facilities, stormwater management, recreation facilities.

Financing Mechanisms

HB1141 requires municipalities to identify ways to finance future infrastructure improvements. As the Plan is currently written, significant growth is anticipated in the City and information on how to pay for future growth needs to be explained more succinctly. It is encouraged to further expand on the following statement: “The City of Brunswick will meet future financial needs through developer funding, impact fees, taxes and grants.” For example, if it is the City’s intent that developer(s) absorb infrastructure expenses associated with major development, what portion of the costs should developer(s) absorb? Should the developer(s) donate land for a school site, pay to update a wastewater treatment plant? Under what conditions should the developers provide such assistance?

Transportation

MDP commends the City for including a full explanation on existing problems, public transportation and alternate transportation including parking and bike/pedestrian paths.

MDP advises that the Plan include a location map that shows the problematic streets/intersections discussed on pages 43-44.

In addition, the Plan would be strengthened by including a location map that indicates the Transportation Plan Proposals mentioned on pages 47-49.

Comments on Water and Sewerage

The Plan should contain a map that illustrates the policy of the City for the installation of existing and proposed facilities. A map would be a significant way of illustrating the Goals of the Plan, found on page 10.

Goal 1 - Management of Future Growth includes: “Redesign of growth boundaries to implement a manageable City Growth Policy.” As noted on page 38, “Future growth as outlined on the Master Plan Map shows areas to the eastern side of the current City limits proposed or growth.”

Goal 3 - Creating a Quality Community for All Brunswick Citizens and Businesses calls for providing city services in a timely manner.

The Plan does not give a measure for staging development. The timing of development is one of the points of consistency determined in the Smart, Green, and Growing – Smart and Sustainable Growth Act of 2009. MDP reviews projects to determine consistency and look for timing as one of the necessary elements. Such a map would be useful to deter delay in the amendment review process and the Clearinghouse Review Process. A map with accompanied discussion would strengthen the Plan.

Data Inconsistency

1. Page 55: “The City projects a population of 10,259 in 2030.

Page 62

“The City projects a population of 12,289 in 2030.”

2. Page 62:
“...to accommodate the projected growth by 2030 equating to a total daily demand of approximately 1.82 mgd.”

Page 67:
The City estimates that the drinking water demand will reach 1.75 mgd by 2030

Accounting for Commercial, Industrial, and Institutional Demand

On page 62 the amount of water projected for commercial, industrial, and institutional uses is not clear. The draft Plan reads:

“Averaging 2.6 persons per household this population increase would result in a need for approximately 2,351 new dwelling and approximately 500 new commercial taps. With the assumption that each new dwelling unit or tap will consume 250 gallons per day it is assumed that the future water resource needs of the City to be an additional 712,750 gallons of water to accommodate the projected growth by 2030 equating to an average daily demand of approximately 1.82 mgd.”

Generally, the projected consumption for commercial taps is calculated on a different basis than projections for residential use. Estimate consumptive use for properties zoned for commercial, industrial, or employment use is generally based on the number of acres involved or number of employees who will occupy. For example: Estimate consumptive use for properties zoned industrial is 250 gpd per acre.

It is recommended that the City consider alternative projection strategies for a more accurate project for commercial, industrial, and employment uses. They could consult MDE for addition perspectives. It is noted that the City has a Municipal Water Management Plan that was approved by MDE. If the figure of 250 per commercial tap is part of the MDE approved water management plan it is recommended that the City cite that Plan as the basis for the 250 per tap calculation.

Drinking water

On page 64 the draft Plan stated that drinking water is “Obtained from surface and ground water”. However, it is not clear how ground water is used. Consideration should be made to provide more discussion concerning the use of groundwater.

The discussion on Yourtee Spring could be extended. It is not clear where or how the stream is part of the system. For example, on page 79 the Plan states: “The only treatment that is done to water gathered from this source is chlorination and, at present, the spring water from Yourtee needs minimum treatment.”

If the Yourtee source needs minimal treatment, where and how does this source enter the City’s water treatment plant? The Water Resource Element should provide a discussion that includes where and how the Yourtee Spring source is part of the overall water system.

Miscellaneous

On page 14, the sentence, “Excluding data from the 2000 Census Brunswick’s population has increased steadily since 1960.” is not clear what was intended.

Water Resources Element

The WRE within the draft 2011 Brunswick comprehensive plan incorporates most of MDP's comments on the draft 2009 Brunswick WRE. The WRE of the draft 2011 plan will provide excellent policy guidance to city elected officials and staff as they pursue implementation of the 2011 Brunswick land use plan. As noted in our 2009 comments, MDP suggests that the WRE of the 2011 plan indicate that the suitability of receiving waters cannot be assessed at this time due to the absence of a Total Maximum Daily Load (TMDL) for those receiving waters.

General Comments

A map of Brunswick Crossing PUD, the Daugherty Tract and the Cooper Tract should be included in the Plan to provide context of where current and future growth will occur in relation to community services and infrastructure.

Text on the City of Brunswick Draft Master Plan Map (page 126) and the Community Legacy Plan map (page 132) are difficult to read. It may make it easier to read by increasing the page size to 11"x17".

Table 1. Population Trends for Brunswick City and Specified Areas

	Census			Change								
				Net			Percent			Average Annual Growth Rate		
	1990	2000	2010	1990 - 2000	2000 - 2010	1990 - 2010	1990 - 2000	2000 - 2010	1990 - 2010	1990 - 2000	2000 - 2010	1990 - 2010
Brunswick	5,117	4,894	5,870	-223	976	753	-4.36%	19.94%	14.72%	-0.4446	0.9134	1.3823
Frederick County	150,208	195,277	233,385	45,069	38,108	83,177	30.00%	19.51%	55.37%	2.6587	0.8953	4.5052
Maryland	4,780,753	5,296,486	5,773,552	515,733	477,066	992,799	10.79%	9.01%	20.77%	1.0297	0.4322	1.9048

SOURCE: U. S. Department of Commerce. Bureau of the Census.

Prepared by MD Department of Planning. Projections and Data Analysis/ State Data Center. 2011.

Table 2. Summary of Population Projections for Brunswick and Specified Areas

	Census 2010	Projection 2030	Change: 2010 - 2030		
			Net	Percent	Average Annual Growth Rate
MDP Population Projection	5,870	8,514	2,644	45.04%	1.8767
Brunswick City Comprehensive Plan	5,870	10,259	4,389	74.77%	2.8308
Frederick County	231,350	328,550	97,200	42.01%	1.7693
Maryland	5,773,552	6,664,250	890,698	15.43%	0.7199

SOURCE: U. S. Department of Commerce. Bureau of the Census.

Prepared by MD Department of Planning. Projections and Data Analysis/ State Data Center. 2011.



Maryland Department of Transportation
The Secretary's Office

Martin O'Malley
Governor

Anthony G. Brown
Lt. Governor

Beverley K. Swaim-Staley
Secretary

Darrell B. Mobley
Deputy Secretary

July 13, 2011

Ms. Jenny King
Maryland Department of Planning
301 West Preston Street
Suite 1101
Baltimore MD 21201-2305

Dear Ms. King:

Thank you for the opportunity to review the City of Brunswick 2010 Master Plan Update. In summary, the Maryland Department of Transportation (MDOT) comments constitute an R1 determination (Generally Consistent with Qualifying Comments), with the following comments provided:

1. Generally, in order for MDOT to provide a thorough review of plans such as this one, it is requested that we be afforded a 60 day review period. This enables us to coordinate with our various modal administrations (e.g. SHA, MTA) in order to provide comprehensive, multi-modal comments.
2. Page 35 of the section on **Community Design and Development Principals** refers to "maintaining a pedestrian friendly environment". We would suggest that this wording be modified to include cyclists.
3. Page 35 of the section on **Community Design and Development Principals** also refers to reducing dependence upon the automobile. The master plan document should be more specific when discussing the need to reduce the number of daily trips by automobiles within the community/local roadway network rather than stating a general "dependency."
4. A comprehensive effort to reduce traffic congestion should encompass bicycle accommodations throughout the community. Bike lanes, for example, are mentioned in the text, but not shown in the Master Plan map.
5. The hiker/biker paths only extend into existing areas of the city when the proposed twenty year growth area would almost double the land area extending further north. The plan for these multi-use paths should connect those future developments to the train station and the C&O Towpath as well. This may help to facilitate parking at the MARC station when future growth does occur.

My telephone number is _____
Toll Free Number 1-888-713-1414 TTY Users Call Via MD Relay
7201 Corporate Center Drive, Hanover, Maryland 21076

6. Connecting the paths into the core of the city would help to draw bicycling tourists from the C&O towpath as well.
7. Planned improvements, expansions, and new construction of schools and emergency services facilities should be closely coordinated with our State Highway Administration (SHA) to address potential access management, congestion, and safety issues. MDOT, with input from various local, federal and private stakeholders, has developed a Maryland State Highway Safety Plan. The purpose of the plan is to decrease the number of fatalities and injuries on all roads in Maryland. Frederick County's Community Traffic Safety Program (CTSP) Coordinator, Ms. Suzy Solo, works with local jurisdictions to implement the strategies set out in the safety plan. Ms. Solo can be reached at 410-876-4819.
8. Page 49 - Regarding the proposal to undertake a survey of transportation assets, we would recommend that consideration of transportation alternatives including bicycle and pedestrian circulation, be considered as part of the overall review of road conditions, and that recommendations for improvements to better accommodate such uses be incorporated.
9. Page 49 - Reference to Community Legacy plans (and transportation components specifically) might include reference to proposed steps for revisiting boundaries and plans associated with them, to address new parameters for this program established as part of the Sustainable Communities Act of 2010.
10. Discussion of needed improvements for Alternative Transportation is also quite vague. The plan could usefully specify existing use rates for the park and ride lots, existing MARC and TransIT ridership to better explain the suggestion that the current lot be expanded. Reference to the MARC Growth and Investment Plan might also be taken into consideration in outlining planned needs for the station area and its potential for better integration. In principle the idea of working with the County to examine potential integration of the MARC station and Downtown with the park and ride facilities would appear to have merit.
11. Pages 50 and 51 – there is discussion under the heading Alternative Transportation that covers carpooling, bicycling and pedestrian issues. We would recommend that these three subjects be addressed independently and that bicycling and walking issues be addressed more comprehensively and coherently.
12. Pedestrian Issues –
 - There should be an analysis regarding the current state of the sidewalk infrastructure network in terms of connectivity, missing segments, and

compliance with accessibility laws and guidelines (e.g. presence of wheelchair ramps, accessible pedestrian signals, and whether there are any problems with street furniture blocking sidewalks).

- Are there any needs to improve pedestrian safety in terms of crosswalk painting, traffic calming, or perceptions of problems in crossing roadways? Are there conflicts with multiple driveways crossing sidewalk areas? Is the central business district an inviting place to walk? Are children able to walk to schools that are within walking distance of their homes?

13. Bicycle Issues -

- The last sentence of the first paragraph on page 51 reads, "*However with a park and path system applied throughout the City it will be possible to provide access around the City by bicycle without ever being on these higher classified roads.*" This is not a desirable goal. A desirable bikeway network should consist of both on-road and off-road bikeway facilities that provides bicyclists with choice. A bicycle path network alone is unlikely to provide bicyclists with access to every origin and destination point within Brunswick. Many bicyclists shun bicycle paths because of conflicts with pedestrians, indirect routing, inability to accommodate speeds that roadways can, and often poorer maintained surfaces than roadways. Bicycle paths often have higher crash rates than on-road bikeways.
- Collector and higher classification roads should be analyzed to see if bicycle lanes or other bikeway improvements can be retrofitted. Bicycle parking should be analyzed to see if there are unmet needs at schools, commercial areas and the Brunswick rail station. Bicycle education should be offered to both children and adults so they can use existing streets.

14. It is important to understand exactly where any active and inactive freight railroad rights of way (generally + or - 66' wide) are located to ensure that future zoning plans *protect* the use of freight (or passenger) rail.

- Active Rail: In more localities industrial zoning is losing out to mixed-use areas for revenue attraction or other reasons. But with population, trucks, traffic congestion, and freight demand all increasing over time, rail freight transportation can become more attractive from a cost-effective and environmental perspective, thus providing public benefits. It is important to locate and map the lines and properties/facilities that are served by rail for future county planning purposes. The process may also assist planners

Ms. Jenny King
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in identifying future locations that should be protected or marketed for rail purposes.

- Inactive Rail: Those areas that have had inactive rail for long periods of time may still be considered “inactive,” and not officially “abandoned” as defined by the FRA. Although unlikely, the rail may become active again should a business model for a customer/railroad recognize rail as the most effective means of transportation. Therefore, it is important to understand which rail is currently active (and protect those areas accordingly) and which is inactive vs. abandoned.

I hope these comments are helpful.

Sincerely,



Keith Bounds, Regional Planner
Office of Planning and Capital Programming

cc: Ms. Rita Elliott, Clearinghouse, Maryland Department of Planning
Mr. David Coyne, District Engineer, State Highway Administration
Mr. Donald Halligan, Director, Office of Planning and Capital
Programming, Maryland Department of Transportation
Mr. Darrell Mobley, Acting Administrator, State Highway Administration
Mr. Greg Slater, Director, Office of Planning and Preliminary Engineering, State
Highway Administration
Mr. Ralign Wells, Administrator, Maryland Transit Administration