



Maryland Department of Planning

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September 8, 2010

Denis Superczynski, Planner
Frederick County Planning Department
Winchester Hall
12 East Church Street
Frederick MD 21701

Re: Woodsboro Comprehensive Plan

Dear Mr. Superczynski :

Thank you for submitting the draft Woodsboro Comprehensive Plan to the Maryland Department of Planning (MDP) for our review.

The attached comments discuss general comments and those which must be incorporated in order to meet the statutory requirements of HB1141.

Again, thank you for the opportunity to review and comment on this Plan. Please do not hesitate to contact me, Jenny King or Jason Dubow, WRE Coordinator at 410.767.4500 should you have any questions.

Sincerely,

Peter G. Conrad, AICP
Director
Local Government Assistance

Enclosure: Comments on the Woodsboro Comprehensive Plan, Municipal Growth Element Checklist, Comments from the Maryland Department of Transportation

cc: Eric Soter, Director, Frederick County Planning & Zoning
Dan Caywood, Town of Woodsboro Planning Commission Chair
Jenny King, Regional Planner
Jason Dubow, Planner, WRE Coordinator
Rich Josephson, Director, Planning Services
Rita Elliot, MDP Clearinghouse
File



**Maryland Department of Planning
Comments on the Town of Woodsboro Comprehensive Plan
September 8, 2010**

The Maryland Department of Planning (MDP) has reviewed the Town's Comprehensive Plan and offers the following comments for your consideration.

Chapters 1-5

No comments on these chapters.

Chapter 6: Transportation

MDP appreciates the Town's excellent work on sidewalk gap inventory and mapping. This will provide safe and consistent sidewalks that enable interconnected neighborhoods and increase accessibility to retail and recreational facilities. We recommend that the Town also initiate subsequent funding mechanism efforts for those sidewalk projects.

MDP strongly support the action items for the objective 4 under Goal 1: Planning for pedestrian safety measures for the two lighted intersections on the MD 194 bypass and a single pedestrian bridge over MD 194 somewhere between two intersections. It will facilitate safe pedestrian movements between Town parkland and downtown.

The proposed neighborhood mixed use at the southern portion and Town Center designation at the northern portion on the MD 194 bypass could generate more frequent traffic. In coordination with SHA, access management strategies should be included to protect the capacity and safety of MD 194. Managing access onto MD 194 should be one of the transportation objectives.

Chapter 7: Community Facilities

Page 7-4 discusses the various service categories. The Plan notes the W-5 category as Planned Service within 7-20 years. This statement should be updated to coincide with the 2008 Water and Sewerage Plan categories. S-5/W-5 is now 7-10 years.

The map on pages 7-7 and 7-8 needs to be updated to reflect the 2008 Water and Sewerage Plan categories.

Chapter 8: Water Resources

The WRE is incomplete. The WRE will meet the requirements of HB1141 with recommended comments added. The most important comments to include are in **bold**. The WRE does not yet effectively address the following purposes of the law and/or State guidance, as follows:

- The WRE should, for each watershed, calculate the total forecasted nutrient load, which includes nutrient loads from current and future septic tanks and stormwater runoff (MDP M&G 26, p. 13).

- Does the WRE include nonpoint source loading analyses conducted in support of the WRE and provide a preliminary assessment of potential changes in nonpoint source loads due to land use planning decisions (MDP M&G 26, p. 39)?
- Does the WRE show or refer to the boundaries of relevant areas used for planning including current sewer and water service areas and watersheds (MDP M&G 26, p. 27)?
- Does the WRE estimate the future demand for sewer by reviewing associated commercial, industrial, and agricultural water demand (MDP M&G 26, p. 27)?
- For each watershed, identify current WWTP loads (MDP M&G 26, p. 12).
- Does the WRE show the available permitted capacity of existing WWTPs (MDP M&G 26, p. 33)?
- The WRE should consider the projected water capacity needs of the proposed growth areas identified in the municipal growth element (MDP M&G 26, p. 15).
- The WRE should be drafted in a manner that supports the County Water and Sewerage Plan (MDP M&G 26, pp. 18-19).

Overall comments:

- Overall, the WRE is too focused on the County and not specific enough to the municipality. At times, the copying of text from the County WRE with minimal alterations creates a lack of clarity in the WRE. Adding clarity to the WRE will ensure that Town decision-makers can direct staff and resources to identify and resolve water resource constraints in the most efficient and cost-effective manner possible. Examples of lack of clarity in the WRE include:
 - Page 8-7 of the WRE states that “the current drinking water supply for the municipality is compared with the projected build out of the designated community growth area in the Woodsboro Comprehensive Plan.” The Comprehensive Plan should not refer readers to the document they are reading. Perhaps this sentence was meant to refer to a specific section of the Plan, such as the Municipal Growth Element?
 - Page 8-13 of the WRE states that “the Town of Woodsboro provides water to 235 customers including nine residential properties outside of the Town boundary.” This section was copied from p. 29 of the County WRE; however, the table provided in the Town’s WRE (page 8-14) indicates that the Town provides water to 335 customers. Please resolve this discrepancy.
 - Page 9-17 of the MGE states that the Town serves 439 households with sewer. It seems unlikely that the Town provides 235 households with water and 439 households with sewer because there is only one private well mentioned as being within the town. Please resolve this discrepancy or clarify why the difference exists.
 - Page 8-14 of the WRE includes text from page 29 of the County WRE, which reads, “At present, there are less than 10 water service connections available.” The *Water Supply Capacity and Planned Growth* section on the same page states that “the Town water supply – at current withdrawal limits – would begin to run short before

supplying the 145th dwelling unit.” Please clarify whether the Town has the capacity for 10 new water service connections or 145.

- Page 8-15 of the WRE states that “water consumption by individual households in Frederick County is below the national average,” however, it is not clear if this is also true of Woodsboro given that the average household size in the Town is 3.1 persons per dwelling unit (p. 3-1), while the County’s average household size is 2.72 persons per dwelling unit (p. 6 of the Frederick County WRE).
- Page 8-18 of the WRE states that the population of Woodsboro is 961 people. The text does not provide a year for this population estimate, nor does this estimate appear elsewhere in the Plan. This figure is from page 44 of the County WRE, but the Town Plan does not appear to provide a current (2010) population estimate. Page 3-2 indicates that the 2005 population for the Town was 912. The Plan should provide a 2010 population estimate to use as a basis for planning for future growth needs in the WRE and MGE, e.g., what is the amount of water use from future population growth from 2010 through 2030?
- Page 8-20 of the WRE states that there are “minimal inflow and infiltration issues across the system.” However, one of the wastewater action items on page 8-21 is to “explore funding sources and programs to address inflow and infiltration problems in the Town’s wastewater system.” This action item is from page 46 of the County WRE and may have been intended to address issues with the County’s wastewater system and not apply to the Town of Woodsboro. Please resolve this discrepancy and clarify whether or not there is an I&I issue in the Town of Woodsboro.
- **Page 8-13 of the WRE states that the Town’s average daily water consumption is 70,000 GPD. Page 7-4 states that the Town’s annual average water consumption is 120,000 GPD. Please resolve this discrepancy and ensure that the figure represents current use as of 2010.** Without an accurate starting point for measuring available water capacity, the WRE cannot serve to determine whether drinking water availability is a constraint or not in implementing the Town’s land use plan.
- Page 8-15 of the WRE states that “It is only in the years following the *turn of the next decade* that the Town may find itself unable to grow due to constraints on its water supply.” Because the WRE is an amendment to the 2008 comprehensive plan, readers may not be clear on which decade is being referred to. Please specify specific years and dates whenever possible.
- The Town should be commended for including a policy of timing development within the Town’s growth areas based on the adequacy of drinking water supplies (p. 8-16).
- The Town should be commended for emphasizing the importance of working with the County to explore the application of water recharge easements and the feasibility of interconnecting with the County distribution system (p. 8-16).
- **The WRE should include maps of the current water and sewer service areas.**
 - The Community Facilities Element includes maps of the water and sewer service plans (pgs. 7-7 and 7-8), but these maps need to be updated. The maps are dated February 2008; however, a new County Water & Sewerage Plan was approved in

December 2008. As a result, the categories and definitions have changed.

- **The WRE should be drafted in a manner that supports the County water and sewerage plan.**
 - The sizes of community facilities differ in the two documents.
 - The County adopted Water and Sewerage Plan notes on page 3-3: The distribution system consists of 6 and 8 inch mains. The Town Comprehensive Plan notes on page 7-4 that water is distributed by 8 and 12 inch mains.
 - The County adopted Water and Sewerage Plan states on page 3-30 that a 200,000 gallon ground water storage tank was built. The Woodsboro Comprehensive Plan notes on page 7-4 that the Town has a 250,000 gallon storage tank.
 - The Drinking Water Action Items should include strategies to determine the amount of leakage and to eliminate leakage of water.
 - Page 3-30 of the County Water and Sewerage Plan states that Population projections for the Town of Woodsboro indicate a potential water demand by the year 2030 of 133,200 GPD. The Town cannot meet this demand without establishing new wells and the water loss via leaks is corrected.
 - Page 3-30 of the County Water and Sewerage Plan states that Woodsboro has an ongoing program of leak detection and correction.
 - The Woodsboro WRE notes on page 8-14: “The Town also experiences water loss via leaks.” There is no follow up about addressing this issue in the WRE. The passages in the County Water and Sewerage Plan indicate that there is a greater issue at stake than presented in the WRE.

Comments on the Water Demand Analysis:

- **The WRE should make clear what the Town’s water limitations are. The WRE should discuss both the water appropriation permit and the design capacity of the water treatment plant. Please resolve the following discrepancies:**
 - Page 8-13 of the WRE states that the Town is permitted to withdraw 120,000 GPD and that the Town’s average daily water consumption is 70,000 GPD. This leaves 50,000 GPD in unused permitted capacity capable of servicing approximately 200 additional connections (50,000 GPD / 250 GPD per EDU).
 - Page 8-14 of the WRE states that at present there are less than 10 water service connections available (approximately 2,500 GPD at 250 GPD per EDU).
 - Page 8-15 of the WRE states that the Town will not be constrained by the withdrawal limits of its water supply system during the next ten to fifteen years.
- **The water demand section should include an analysis of water demand at build out of the Town’s proposed growth areas.**
 - Table 14 on page 9-16 of the MGE states that at build out the Town’s proposed growth areas could accommodate 460 additional dwelling units. Though the WRE states that the Town is “unable to meet the water demands utilizing current withdrawal limits” (p. 8-15), it should also estimate water demand at build out from 460 dwelling units in order to determine the size of the potential water deficit.
 - The Town may wish to consider reducing the size of its proposed growth areas or phasing growth in order to assure the availability of future drinking water supplies.

- The Plan makes passing reference to alternate sources of drinking water including the potential use of Israel Creek (p. 4-3) and reclaiming drinking water from an inactive quarry (p. 8-14). The WRE should provide a more detailed discussion of these options or include recommendations to investigate these options more thoroughly. **In addition, the Town should work with MDE to determine the feasibility of these projects and whether they will be sufficient to meet the Town's build-out needs. If not, the WRE should be revised and if necessary, the proposed growth areas reduced.**
 - On page 8-9 the WRE states that Israel Creek was determined to have the lowest expected availability of water when compared to all sub-watersheds of the Monocacy River. Page 8-10 further concludes that without a reservoir or adequate storage, streams cannot meet the minimum required flow. If the Town has determined that Israel Creek is not a viable source of future water then the *Surface Water Resources* section of Chapter 4 should be updated (p. 4-3).

Comments on the Sewer Demand Analysis:

- The Town is commended for including an analysis of sewer demand at build out for the proposed growth areas (p 8-19).
- **For each watershed, the Town should identify the current WWTP discharge nutrient loads.**
- **The WRE should show the available *permitted* capacity of the existing WWTP and the Tributary Strategy point source limit for the WWTP.**
 - The design capacity of the WWTP is 250,000 GPD. It is not clear what the tributary strategy point source cap is for the WWTP or the permitted capacity.
- The WRE should identify the limiting factor in the Town's WWTP capacity.
 - Will future growth be limited by WWTP capacity (design or permitted) or the point source cap?
- **The WRE should estimate future demand for sewer by reviewing associated commercial, industrial, and agricultural water demand.**
 - Though the Plan does estimate the amount of sewer demand created by 460 new dwelling units at build out, it does not estimate associated non-residential demand.
- The WRE does not state whether there are any septic tanks in the Town. Please add this information. If septic tanks exist, please note whether there are any plans to connect any failing septic tanks to the public sewer system and the capacity needed to serve them.

Comments on Identifying Suitable Receiving Waters:

- **The WRE should include nonpoint source loading analyses that provide a preliminary assessment of potential changes in nonpoint source loads due to land use planning decisions.**
 - Page 8-24 of the WRE states that any impacts from development occurring on undeveloped land within the growth area would likely be off-set by the conversion of currently farmed parcels out of agricultural use. The Town should state that they will work with the county to refine the nonpoint source loading estimates based on the Town's land use plan.

- The WRE should combine the Town's point source and nonpoint source pollution forecasts.
- **The WRE should discuss nonpoint source loading for nutrients.**
 - The Frederick County WRE includes a nonpoint source loading forecast countywide that incorporates the land use plans for the region (adopted 1997-2008). The Woodsboro WRE should reference the County WRE, noting that the County worked with Woodsboro to complete a countywide nonpoint source loading forecast, and that the Town will continue to work with the County on watershed protection and assessment of any changes to the Town's municipal land use plan.
- **The WRE should discuss the suitability of receiving waters.**
 - One option would be to include the following sentences in the Town of Woodsboro WRE: "the presence of a TMDL is a sign that pollution control efforts must outweigh additional pollution impacts from future land use change and WWTP flows to prevent further degradation of the waterbody. For the receiving waters in the Town of Woodsboro without a nutrient TMDL, a determination of the suitability of receiving waters cannot be made. However, for waterbodies with nutrient TMDLs, a preliminary assessment can be made. Pollution forecasts, although capable of comparing the relative benefits of different land use plans, are not precise enough to allow for a direct comparison to nutrient TMDLs. The Town of Woodsboro recognizes though that waterbodies with nutrient TMDLs can only be considered suitable receiving waters if future nutrient impacts are offset. The Woodsboro WRE includes recommendations for pollution control efforts to help achieve that goal. In addition, the Town of Woodsboro recommends refining the pollution forecast in the future to allow for direct comparison to nutrient TMDLs as information becomes available."

Chapter 9: Municipal Growth & Land Use

Population Projections

The Plan estimates that there will be an additional 540 people, a total population of 1,452 persons. However, there is no population projection chart/graph that accompanies this figure. This would be beneficial in identifying the pace/rate of growth in time increments. An accompanying estimate of 175 new households is given.

Page 9-12 notes an average of 2.9 persons per household. The use of a constant figure does not give a clear picture of persons per household. Page 3-2 has a household size of 3.1 persons per household. Consideration should be given to modifying this constant to give a more realistic picture and to correct Plan inconsistencies.

Development Capacity Analysis

The Plan outlines vacant land within the current municipal boundary. Two different sets of numbers appear which confuse readers. Using the undeveloped acres figures appearing on p. 9-9, there are 26 acres which can be built, that accommodate 124 units (Table 12). The difference in projected units and capacity is 51 units. Another set of numbers appears on p. 9-22 (Table 17), which outlines that there are only 23 residential acres with a capacity for 77 households.

The Town needs to select one number to go by in regards to this figure. Having variable projections for capacity leads to problems in assessing how much growth area is required to meet demand. The difference between these capacities is 47 units. Why are there two different estimates?

Growth Areas

The Plan discusses three growth areas. As outlined in the chart on p. 9-16, there is potential for an additional 460 housing units (all 3 growth areas). Given that the deficit between the projected population and in-town capacity is 51, this growth plan may be a little aggressive; with all three growth areas there is a surplus of 409 units over the 51 and 248 units over the 51 if only accounting for growth areas 1 & 2.

The Town should be commended for including a development capacity of the growth areas, but would be advised to consider down-sizing these areas or outlining a more substantial phased approach (timeline), given the supply/demand ratio.

An issue here is that there are two different charts in regard to these growth areas (Table 18, page 9-2 and Table 14, page 9-16). Again, these Tables have varying information. There is a difference of 4 housing units and 11 persons.

The Town needs to decide which set of numbers will be used in this Plan. Why are these numbers different? Which more accurately reflects capacity?

Community Facilities/Infrastructure

The Plan needs to discuss facilities and infrastructure as they relate to projected future growth. How will the increase of 540 people impact services and infrastructure? This can be achieved by using a multiplier and including a chart with increases needed in sq footage, acreage, personnel, etc. For example, the discussion of schools should outline capacity, current enrollment, projected enrollment, what percentage of capacity the increase in students will be. This could be incorporated into the plan via a chart/table.

Similarly for park/recreation lands, a list of current parks/areas and their acreages, current town population, expected town population and if an increase in lands is necessary to meet the increase in population.

General Comment

P. 9-2 is missing from the Plan.