



Maryland Department of Planning

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September 29, 2011

Honorable Mildred L. Myers  
Mayor of Smithsburg  
P.O. Box 237  
Smithsburg, Maryland 21783 - 0237

Mayor Myers:

Thank you for the opportunity to comment on the Draft 2011 Town of Smithsburg Comprehensive Plan. This 2011 draft will update the adopted 2009 Comprehensive Plan which addressed many of the elements required by House Bill 1141.

The Maryland Department of Planning (MDP) believes that good planning is important for efficient and responsible development that adequately addresses resource protection, adequate public facilities, community character, and economic development.

The MDP has analyzed the draft comprehensive plan and it appears that this draft Plan recognizes and accommodates the unique nature of the Town of Smithsburg. However, we recommend that you consider our comments and further refine the components contained in the draft plan. The attachment includes comments and recommendations from the MDP. Additional comments that may be forthcoming from other State agencies will be forwarded as we receive them.

Please keep in mind that the attached review comments reflect MDP's thoughts on ways to strengthen the Town's Plan, as well as continuing to satisfy the State requirements outlined in HB1141.

Please contact me at (410) 767-4553 or David Cotton, Regional Planner for the Western Maryland Office, at (301) 777-2161.

Sincerely,

Peter Conrad, AICP  
Director, Local Government Assistance

Enclosure: Comments on the Draft 2011 Town of Smithsburg Comprehensive Plan

cc: Jill Baker, Town of Smithsburg  
David Cotton, Regional Planner  
Rich Josephson, Director, Planning Services  
Rita Elliott, MDP Clearinghouse  
File



**Review Comments from the Maryland Department of Planning  
Town of Smithsburg  
2011 Comprehensive Plan Amendments  
Water Resources and Municipal Growth Elements  
September 29, 2011**

During the 2006 legislative session House Bill 1141 was passed requiring Counties and Municipalities address several new elements within their Comprehensive plans. Under the provisions of this law all new elements will need to be included into comprehensive plans by October 1, 2009. Guidance documents for the Municipal Growth Element and the Water Resources Element are available at the Maryland Department of Planning (MDP) website [www.mdp.state.md.us](http://www.mdp.state.md.us).

MDP has reviewed Smithsburg's Comprehensive Plan and offers the following comments.

**Water Resources Element**

The WRE is complete and should serve the Town well in its efforts to ensure successful implementation of its land use plan despite water resource constraints. The WRE could be strengthened by incorporating the following comments:

Given the lack of sufficient wastewater capacity at the Washington County WWTP to accommodate build-out of the Smithsburg land use plan (p. 5-9), the WRE could note that the Town will re-evaluate its land use plan during the next comprehensive plan review to assess whether it should reduce some of the Town's growth area.

The WRE notes that the City of Hagerstown WRE includes assumptions for the 2030 Smithsburg water demand that indicate that Smithsburg likely would be able to amend its water agreement with Hagerstown to not only accommodate 2030 growth but also its water demand at build-out (pp. 5-1 to 5-3). To facilitate future amendments to the agreement, the WRE should include the page number of the Hagerstown WRE where the actual Smithsburg 2030 water demand forecast is provided and should list the amount of water demand that the Hagerstown WRE forecasts for Smithsburg.

The WRE includes nonresidential water and sewer demand in its build-out analysis. The WRE could be improved by also including nonresidential water and sewer demand in its 2030 forecasts (pp. 5-3 and 5-8).

The following mathematical inconsistencies should be resolved to help increase clarity and consistency in the WRE and in other sections of the comprehensive plan:

- The MGE indicates that the upgrade of the Washington County WWTP from 0.333 MGD to 0.6 MGD would increase EDUs by 1,335 (p. 3-3); however, this assumes the use of 200 GPD of wastewater per EDU, which is inconsistent with the 235 GPD of wastewater per EDU assumed in the WRE. The 1,335 EDU figure should be revised to indicate 1,136 EDUs (this uses 235 GPD per EDU).
- Tables 5-3 and 5-4 use the planning figure of 230 GPD per EDU to derive the EDU amounts, which appears to be incorrect. Instead, given the footnotes in these tables and the discussion of the wastewater planning figure in the text (p. 5-8), the WRE should be amended so that Tables 5-3 and 5-4 derive the EDU amounts using 235 GPD per EDU.
- The MGE indicates that there are only 72 EDUs of WWTP capacity remaining for Smithsburg (p. 3-3). Table 5-3 of the WRE indicates that after accounting for pipeline development, only 42 EDUs of WWTP capacity would remain for new development in Smithsburg (p. 5-7); however, given that this table should instead use the 235 GPD per EDU planning figure, the correct amount of remaining WWTP capacity after accounting for pipeline development is 41 EDUs. The WRE should reconcile these figures and should ensure the text in the MGE is consistent with the WRE.

Table 5-4 should indicate 340 additional EDUs under the Moderate Growth scenario and 678 additional EDUs under the High Growth scenario (p. 5-8)

## **Municipal Growth Element**

### **Population Projections**

We appreciate Smithsburg's effort to revise its population projections based on the comments provided in the Municipal Growth Element. Smithsburg's population projections are generally in-line with MDP estimates. The plan states that the Town's 2030 population is estimated at 3,838-4,788. According to MDP's Historical and Projected Population for Smithsburg, the Town's 2030 population estimate is 3,795-5,603.

### **Development Capacity Analysis**

According to the plan, as of 2009, Smithsburg has 1,069 housing units, another 138 housing units already approved, totaling 1,207. The plan states that over the next 20 years, the Town expects between 340 and 678 additional housing units, for a total of 1,547 – 1,885 housing units. The plan specifies that through infill development, Smithsburg can hold approximately 100 housing units. According to table 3.10 on Page 3-11, the Town identified 5 annexation areas plus 2 secondary areas with enough capacity to hold an additional 1,315 additional housing units, for a grand total of 2,522 housing units (1,315+ 1,207 HU's), leaving a surplus capacity of 637 HU's.

Please keep in mind the relationship between land supply and future population demand in the Town. If you provide too little land for development (be it on greenfields, redevelopment or infill) the land cost will become too high or development may spill over to adjacent jurisdictions. If you provide too much land for development, 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.

The plan mentions it does not intend to annex all of these areas within the 20 year timeframe. If this is the case, we recommend you revise your annexation plan to include detailed information regarding a phased growth strategy (i.e.-specifying which lands will be annexed first, identifying phasing thresholds that trigger annexation). Please keep in mind that a Comprehensive planning document is not a static document. A Comprehensive Plan is designed to be revised to reflect future changes in the economy, the environment, the housing market, etc. If the Town doesn't expect to annex all of the land within the 20 year timeframe, consider omitting superfluous annexation capacity from this plan and revisiting this annexation capacity in your next future Comprehensive Plan update.

### **Community Facilities**

The Town is to be commended on the inclusion of Community Facilities information in the Municipal Growth Element. However, the sections on Police and Fire and Emergency Services should be expanded to include ratios of officers to persons served in order to ensure there are enough officers to adequately serve the public.

### **Impacts on Community Infrastructure**

It is imperative that Smithsburg continue to work with Washington County to meet potential water and wastewater capacity challenges.

### **General Comments**

- On Graph 4.1 on page 4-3, please provide population projection figures on the chart.
- On page 5-9, the second paragraph under the Build-Out Analysis section appears to be missing text.