



Maryland DEPARTMENT OF PLANNING

12/27/2024

Sue Beachy, Planning Commission Chair
Town of Grantsville
170 Main Street
Grantsville, MD 21536

Dear Ms. Beachy:

Thank you for the opportunity to comment on the town of Grantsville's Comprehensive Plan Draft (Draft Plan). 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, housing, community character, and economic development. Please keep in mind that MDP's attached review comments reflect the agency's thoughts on ways to strengthen the Draft Plan, as well as satisfy the requirements of Maryland's Land Use Article.

The Department forwarded a copy of the Draft Plan to several state agencies for review, including the Maryland Historical Trust and the Departments of Transportation, Environment, Natural Resources, Commerce, and Housing & Community Development. To date, we have received comments from the Maryland Historical Trust and the Departments of Environment, Natural Resources, and Housing and Community Development. These comments have been included with this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

MDP respectfully requests that this letter and accompanying review comments be made part of the town's public hearing record. Furthermore, MDP also asks that the town consider state agency comments as revisions are made to the Draft Plan, and to any future plans, ordinances, and policy documents that are developed.

Please contact me at joseph.griffiths@maryland.gov or Korey Layman, Western Maryland Regional Planner at korey.layman@maryland.gov (443)-756-3933, if you have any questions.

Sincerely,

Joe Griffiths, AICP
Director, Planning Best Practices Division

Enclosures: Comments on the town of Grantsville Comprehensive Plan Draft
cc: Robin Jones, Town Administrator, Town of Grantsville
Steve Kelley, Director, Garrett County Department of Community Development
David Cotton, Director, Western Maryland Regional Office, MDP



Review Comments

December 27, 2024

Town of Grantsville Draft Comprehensive Plan

The Maryland Department of Planning (MDP) received the Draft Comprehensive Plan from the Town of Grantsville (Draft Plan) on November 11th, 2024. These comments are offered as suggestions to improve the Comprehensive Plan and better address the statutory requirements of the Land Use Article. Other state agencies, as noted below, have contributed comments and others may submit comments separately. If comments are subsequently received by MDP, the department will forward them to the town of Grantsville.

Maryland State Visions – Synopsis

Land Use Article Section 1-201 requires Maryland jurisdictions with planning & zoning authority to implement the state’s twelve planning visions (visions) through a comprehensive plan. The visions reflect the state’s ongoing aspiration to develop and implement sound growth and development policy. The visions address: quality of life and sustainability; public participation; growth areas; community design; infrastructure; transportation; housing; economic development; environmental protection; resource conservation; stewardship; and implementation approaches.

The town acknowledges Maryland’s visions on page 2 of the Draft Plan and addresses the visions throughout the document. The goals and objectives put forward by the town align with Maryland’s twelve visions, with the visions acting as the framework to be used in achieving the Draft Plan’s goals and objectives.

Conformance with Section 1-406 of the Land Use Article

The following analyzes how the Draft Plan meets the requirements for municipal comprehensive plan elements, in accordance with the Land Use Article.

Development Regulations Element – Synopsis

The element is required to include the planning commission’s recommendations for land development regulations to implement the plan. Regulations are required to be flexible to promote innovative and cost saving site design, protect the environment and identify areas of growth. The areas identified for growth are required to encourage flexible regulations, which should further promote economic development using innovative techniques, streamlining the review of applications, including permit review and subdivision processing.

Comments/Recommendations

- The development regulations could be enhanced by including recommendations to improve the current standards to allow for creative reuse of properties in town. Site design standards could be developed or recommended to accommodate future zoning needs to encourage redevelopment of existing sites that may not conform with older zoning standards.
- One of the town's strategy steps is to review and revise existing codes and zoning regulations to ensure consistency with the goal of higher-density development patterns in Grantsville. MDP recommends including some examples or potential updates, in the Draft Plan, that the town intends to make.
- MDP applauds the town for considering developing zoning incentives or density bonuses to incentivize higher-density development. Providing flexible and creative zoning strategies will help entice future developers and may make older sites more desirable for future development. This could be especially effective in developing affordable senior housing, stated as a recommendation on page 53, as well as redeveloping vacant lots and/or blighted properties.

Housing Element – Synopsis

The housing element is required to address the need for housing within the jurisdiction that is affordable to low-income and workforce households. The housing element is required to also assess fair housing and ensure that a jurisdiction is affirmatively furthering fair housing through its housing and urban development programs.

Comments/Recommendations

- Page 46-47 of the Housing Element addresses the housing affordability needs for the Town of Grantsville, including household incomes and affordable monthly payments based on the town's 2022 Area Median Income, as required by Land Use Article Section 3-114 (a-c).
- The Draft Plan does not include an assessment of fair housing to ensure that Grantsville is affirmatively furthering fair housing as required in Land Use Article Section 3-114. The fair housing requirements/language which HB90 added to LUA 3-114 does not define what an assessment of fair housing entails. However, MDP has provided a [HB90 resources page](#) to provide jurisdictions with available fair housing resources and best practices, and how jurisdictions might consider using them in their housing elements.
- To further assess and address fair housing, MDP recommends the town engage its residents and stakeholders in a qualitative approach regarding fair housing. This could be included as a fair housing implementation strategy in the Draft Plan. The information that the town gathers from this process can help to inform the quantitative data gathered from the sources on the resource page mentioned above. Further information detailing this process such as helpful questions to ask can be found [here](#).
- In the Housing Summary, the town identified housing for its aging population as a need to be addressed by allowing residents to age in place. As mentioned above, the town should consider zoning incentives and density bonuses to attract developers to the town to undertake future affordable senior housing projects. Senior housing projects are on the rise throughout the state due to an overall aging population, so planning for and zoning areas accordingly can help attract

developers. Floating zones could be used to redevelop existing infill sites that may fit the needs of the town and the ever-increasing aging population in Grantsville.

Sensitive Areas Element – Synopsis

The sensitive areas element is required to include the goals, objectives, principles, policies, and standards designed to protect sensitive areas from the adverse effects of development (more recently referred to as climate change impacts). The LUA also assigns sensitive areas element data provision and review responsibilities to the Maryland Departments of the Environment and Natural Resources.

Comments/Recommendations

- In Figure 10.1 “Sensitive Areas” on page 55, the light-green shaded area to the Northeast of the town along the Casselman River and the grayscale striped areas shown along the banks of the Casselman River are not denoted in the Figure’s legend.
- The Draft Plan identifies floodplain areas within town limits as sensitive areas. To protect these areas, the town utilizes the floodplain measures of Garrett County, which prohibit development within a floodplain where alternative development locations exist. The implementation of Garrett County’s floodplain measures will ensure consistency with nearby county sites and will allow the county to assist with the implementation of the measures.
- MDP commends the town on its strategy of implementing and enforcing environmental regulations within town limits to address issues such as water quality and stormwater management, on page 59. The town should consider aligning any future regulations with those enforced by MDE. More information on MDE’s environmental regulations can be found [here](#).

Transportation Element - Synopsis

The transportation element is required to reasonably project into the future the most appropriate and desirable location, character, and extent of transportation facilities to move individuals and goods, provide for bicycle and pedestrian access and travelways, and estimate the use of proposed improvements.

Comments/Recommendations

- Traffic calming measures, such as road diet, on-street parking, and streetscaping are mentioned in the Transportation chapter Recommendations section. All the above are proven effective measures in alleviating traffic and parking issues. In addition to these measures, the Maryland Department of Transportation (MDOT) provides other cost-effective strategies that can be implemented for any given transportation issue. This [page](#) provides a helpful graphic detailing various MDOT transportation, traffic, and parking strategies.
- According to the Draft Plan (page 8), almost 85% of Grantsville residents in the workforce travel outside the town for employment, which potentially puts a strain on the transportation infrastructure and on the local economy.
 - To reduce single-occupancy vehicle commuting and the associated wear and tear on transportation infrastructure, there may be opportunities to expand the promotion of commuter choice programs and alternative transportation to help reduce in-town and pass-

- through traffic. There are [multiple incentive programs](#) to support alternative transportation, e.g., transit, ridesharing, and telework/flexible work, for commuters in Maryland. These programs are available for Grantsville residents.
- MDP suggests that the Draft Plan includes a strategy/recommendation to support the public transit service provided to the town. As the town’s population ages (page 42), the need for public transit service will increase. Low-income residents may also need transit service. The Draft Plan indicates that the town’s median household income is much lower than Garrett County’s (page 43). In addition, Garrett Transit Service has been requesting increased funding for its operation and capital improvement needs. Policy support in local comprehensive plans helps secure state and federal transit funding to maintain and improve current and future services.
 - The Recommendations section on Page 72 of the Draft Plan mentions the town’s need to develop a Pedestrian Plan. MDP would be interested in learning more about the development timeframe of this plan, as well as the plan’s current funding status.
 - Page 69 of the Draft Plan states that “sidewalk design standards should be included in Grantsville’s subdivision and land development ordinance to accommodate pedestrian circulation since sidewalks are nearly non-existent in Grantsville”, MDP recommends reviewing [Maryland SHA Bicycle and Pedestrian Design Guidelines](#) as a starting point in the development of Grantsville’s sidewalk design standards.
 - MDP encourages the town to consider including a sidewalk and bicycle trail gap analysis in the plan to help the reader understand where missing links are currently present, so that the town can use this information to prioritize potential future improvements. We recommend visiting [Garrett Trails](#) as a potential starting point in conducting the analysis. Garrett Trails is a nonprofit volunteer organization dedicated to trail development within Garrett County, they also maintain a trail inventory that could be incorporated into the Draft Plan so that the reader is aware of non-motorized transportation facilities that provide access to parks, playgrounds, schools, and other recreational activities.
 - To improve bicycle and pedestrian connectivity within the town, the state provides various funding and technical support programs to support local efforts to improve pedestrian and bicycle facilities. Here is the [link](#) to the website that features MDOT’s active transportation programs.
 - In addition, please review the Federal Highway Administration (FHWA)’s report on “[Small Town and Rural Multimodal Networks](#),” which provides best practice examples to enhance pedestrian and bicycle networks in rural communities and small towns.
 - MDP suggests the addition of an Electric Vehicle (EV) section to the Transportation chapter of the Draft Plan. As the use and demand for electric vehicles continues to grow in Maryland and nationwide, it could be helpful for the town to describe its current conditions pertaining to EVs and EV charging stations, if the town intends to expand upon its offerings of EV Charging stations, EV parking, etc., and how the town intends to expand its offerings.
 - The town may want to develop an EV charging strategy, calling for considering [EV-ready building codes](#) for new construction. In 2023, the Maryland General Assembly passed [HB 830 - Residential Construction - Electric Vehicle Charging](#) requiring the inclusion of one EV-charging or EV-charging-ready parking space for a new single-family housing unit. The town can also

consider requirements or encourage developers to provide EV-ready infrastructure in new multifamily housing and commercial developments.

Water Resources Element – Synopsis

The water resource element is required to consider available data provided by the Maryland Department of the Environment (MDE) to identify drinking water that will be adequate for the needs of existing and future development proposed in the plan, as well as suitable receiving waters and land areas to meet stormwater management and wastewater treatment and disposal needs. MDE and MDP are available to provide technical assistance to prepare the water resources element, ensuring consistency with MDE programs and goals. MDE and MDP jointly developed Water Resources Element (WRE) guidance to demonstrate how local governments can ensure compliance with the WRE requirements. Local jurisdictions are expected to implement the most important aspects of the MDE/MDP WRE guidance ([see checklist](#)).

Comments/Recommendations

- The WRE largely focuses on needed improvements to the town’s water and wastewater systems – based on RK&K’s October 3, 2022 *Preliminary Engineering Report (PER), Town of Grantsville Water System Improvements* – to bring functional system capacities up to design and permitted capacities. MDP commends the town for its focus on acknowledging and addressing system insufficiencies.
- The WRE references a future water demand of 135,000 gpd, based on RK&K’s 2022 PER, and explains the system improvements that would need to be completed to meet this future demand; however, the WRE does not describe the 660 additional housing unit growth scenario from the Municipal Growth Element (MGE), as follows.
- The MGE states “Market forces aside, the provision of adequate water and sewer facilities is the primary impediment to the future growth of Grantsville” (page 38). The MGE goes on, after describing several future growth scenario calculations, to explain that the final methodology used to determine future growth potential for the purposes of the plan was to use planned water and wastewater system improvements and the resulting capacities to determine a future growth potential of 660 additional housing units. MDP commends the town for this logical and conservative approach.
- The wastewater treatment section of the WRE does not reference a specific future wastewater demand, neither based on RK&K’s 2022 PER nor the 660 additional housing unit growth scenario from the MGE. Has the town considered how the comprehensive plan’s future growth scenario will impact wastewater demand?
- MDP recommends the town use the MGE’s future growth scenario(s) within the WRE to tabulate future demand for water and sewer compared to existing and future (based on planned system improvements) water and wastewater system capacities.
- Since the MGE future growth scenario and Future Land Use Map indicate increases in use intensity and development/redevelopment density, has the town conducted an analysis of the impact of the increased intensity/density (including non-residential growth) to future demand and capacity for water and sewer resources? Has the town considered how the increases in

intensity/density will impact storm water, nutrient loading, and climate change considerations? [MDP's Water Resources Element \(WRE\) Guidance Update](#) can be used to guide the town regarding best practices for water resources planning.

The following recommendations are based on the 2022 Water Resources Element (WRE) Guidance Update.

- MDP included a [checklist of best practices](#) to identify and plan for suitable receiving waters within the 2022 WRE Guidance update. The state requests that local governments meet the best practices in the WRE Guidance Update as best as they can within the limitations of cost and time. The town addressed some of these elements in the Draft Plan, such as collaborating with Garrett County to develop and implement sustainable management and conservation strategies explaining the Water-Wise conservation landscape certification program that can be promoted to residents to help improve water quality and promote stormwater best management practices, explaining that Grantsville is situated along the Casselman River, and mentioning that a wetland area is also located in the town. Some examples of best practices from the checklist that the town should consider implementing following Draft Plan adoption include explaining the Water Use Class and assessment status (including TMDLs) for waters within the Town's development areas (if applicable); Pollution Risk Assessment; load reduction tracking; strategies for ensuring a higher-than-minimum-requirements-level of water quality restoration and protection; and identification of recurrent flooding areas and evaluation of whether climate change and planned development will worsen those conditions, along with changes to the land use plan where warranted.
- All local jurisdictions in Maryland are and will continue to experience climate change impacts on water resources and water infrastructure (water, sewer, and stormwater), as well as water impacts on communities. The Community Facilities water/sewer sections could be adjusted to include strategies focused on improving local understanding of current or expected water-related climate change impacts at the local level, and if sufficient information exists, the chapter could add strategies to address these impacts. Best practices for integrating water-related climate change adaptation into the comprehensive plan are listed at <https://planning.maryland.gov/Pages/OurWork/envr-planning/waterresources-mg/2022/03/climatechange-checklist.aspx>.
- If the land use changes (if applicable) in the Draft Plan are planned in a watershed(s) prone to riverine or urban flooding, then the Community Facilities water/sewer sections should be adjusted to incorporate the flooding-related components of the 2022 WRE guidance. See <https://planning.maryland.gov/Pages/OurWork/envr-planning/water-resources-mg/2022/02/framework-cwa-wqfloodmgmt.aspx>. At a minimum, the WRE should indicate the extent of current local knowledge concerning flood-prone areas and should discuss whether implementation of the land use plan (if applicable) will increase, decrease, or have no effect on those flood-prone areas. If the local government does not know what type of impact implementation of the land use plan will have on flood-prone areas, then the WRE should include a strategy to complete a study to determine this.

Goals and Objectives Element - Synopsis

This element requires that comprehensive plan goals, objectives, principles, policies, and standards guide the development, economic growth, and social well-being of the community.

Comments/Recommendations

- The town should continue to update their goals and outcomes as they become available or completed. MDP encourages the town to submit these updates during the five-year reporting update that is submitted to our department as per [Land Use Article Section 1-207\(c\)\(6\)](#).
- A goal for each element is detailed in the Draft Plan, but hot topic areas or additional goals that arise should be expanded and included later in the implementation matrix during future updates.
- MDP appreciates the Draft Plan's goals to maintain and expand existing partnerships and develop new ones. Successful partnerships are key to accomplishing goals and outcomes and the expansion of these partnerships should continue to be explored during future town planning cycles.
- Close collaboration with Garrett County on the implementation of Phases 1 and 2 for the WTP, along with the WWTP upgrades will be crucial for the upkeep and potential expansion of the town's water and sewer infrastructure and for the achievement of the towns infill development and growth goals.

Land Use Element - Synopsis

The land use element is required to reasonably project into the future the most appropriate and desirable patterns for the general location, character, extent, and interrelationship of the uses of public and private land.

Comments/Recommendations

- To better showcase the town's planned future growth area along I-68 and Route 219, MDP recommends amending of the Future Land Use Map (Figure 5.2) to show the recent I-68/Route 219 interchange improvements referenced on page 18 of the Land Use chapter.
- The town should consider the use of a floating zone in the areas designated as Town Mixed Use Districts in Figure 5.2. This would provide the town with ample opportunity to review proposed development within the district and assist the town in ensuring the extension of Grantsville's built-form, character, and historic town scale into this district as proposed in the recommendations on page 20.
- The town should consider further evaluation of future growth options and possibly creating short (1-5 year), moderate (6-10 year), and long-term (10-20 year) growth areas geared toward future growth. This would allow the town to grow as the Draft Plan ages and limit the need for future comprehensive plan amendments.

Community Facilities Element - Synopsis

The community facilities element is required to propose, as far into the future as is reasonable, the most appropriate and desirable patterns for the general location, character, and extent of public and

semipublic buildings, land, and facilities. These facilities may include, but are not limited to fire stations, libraries, cultural facilities, hospitals, places of worship, school and education facilities, and parks.

Comments/Recommendations

- The Draft Plan states on Page 45 that the town should consider education opportunities at elementary school, as well as the development of an advertising campaign to increase awareness of the benefits of recycling. MDE offers [numerous resources](#) pertaining to recycling at work and at school that could benefit the town.
- The town's desire to develop a trail system to connect its pedestrians and cyclists with surrounding natural resources is mentioned throughout the Draft Plan. MDOT's [Recreational Trails Program \(RTP\)](#) could assist the town with funding the development of a trail system in Grantsville that is consistent with the county's Recreational Trail Map and the town's Future Land Use Plan.
- Provided that it is within budget and up to the town's desired specifications, the town should consider the use of permeable pavement, sidewalks, or pavers on future trail, park, or sidewalk projects. Upgrades using these materials would potentially trap harmful materials that can be present in storm runoff and prevent them from entering rivers, tributaries, or the town's stormwater system. Please visit this United States Environmental Protection Agency [resource page on this topic](#) to learn more regarding permeable pavement.

Municipal Growth Element - Synopsis

The MGE is only required in Maryland municipal comprehensive plans. The MGE is required to plan for and describe the municipality's past growth patterns, the capacity of land available for new and infill development, and areas outside of the existing corporate boundaries into which the municipality wishes to grow. The MGE is required to calculate the land area needed to satisfy the demand for growth based on population projections and desired densities. The MGE needs to consider and include any rural buffers, transition areas, and sensitive areas to be protected. MGEs are also required to consider and plan for the community facilities and public infrastructure, as well as their financing mechanisms, required to accommodate desired growth. If a municipality wishes to annex land, such areas are required to be included and described in the MGE.

Comments/Recommendations

- An MGE is discussed on page 33 of the Draft Plan and describes strategies for future expansion. It provides three different growth scenarios for a 20-year period based on occupied housing units. Partial buildout scenarios are also provided using the future land use designations described in the Land Use chapter.
- As mentioned above, the town should consider implementing short and long-term growth goals focusing on growth both within current municipal boundaries and through annexation.

Growth Tiers – Synopsis

Tiers may be initially adopted administratively but must be incorporated into the local comprehensive plan during the next comprehensive planning process. If the Tiers are not incorporated into the comprehensive plan or an element of the plan when the local jurisdiction conducts the planning process,

then the Tiers are not considered adopted. Until Tiers are included in the comprehensive plan, a local jurisdiction can change the Tiers administratively, but once the Tiers are included in a comprehensive plan, Tiers only can be changed through a local jurisdiction's comprehensive planning process.

Comments/Recommendations

- Grantsville adopted the Garrett County Growth Tier Map on December 10, 2012. According to MDP's May 10, 2013, letter to the town, the town was required to incorporate the growth tiers into its comprehensive plan or an element of the plan during the six-year review for the growth tiers to be considered adopted. It does not appear that the town has incorporated the tier map into its comprehensive plan. Without doing so, the map will be considered no longer adopted. The town's new draft comprehensive plan does not mention a Growth Tier Map. [Garrett County's 2022 Comprehensive Plan](#) states, "The official Garrett County Tier Map was incorporated into the 2008 Comprehensive Plan by the County on May 2, 2016, and is hereby incorporated into this Comprehensive Plan Update. The Garrett County Tier Map can be found in Appendix 9" (page 2-21 of the Garrett County Comprehensive Plan). Is the town adopting the Garrett County Tier Map into this comprehensive plan?

General Plan Comments/Recommendations

MDP encourages the town to submit the Comprehensive Plan five-year implementation report as required by Land Use Article [Section 1-207\(c\)\(6\)](#) to update the status of the Draft Plan's goals and objectives. Grantsville's implementation report will be due five years after Draft Plan adoption. If the town is submitting an annual report during a year in which the implementation report is not due, it should select "No" for question two on the annual report short form template for municipalities issuing fewer than 50 new residential permits, which is available on [MDP's Local Government Annual Reporting Tools](#) webpage.

In Section 11.2 Heritage Tourism (p. 61-62), the town should mention that Grantsville falls within the [Mountain Maryland Gateway to the West Heritage Area](#) and that this update of the comprehensive plan, when adopted, incorporates by reference all portions of the Heritage Area Management Plan relevant to Grantsville. Because of its inclusion within the heritage area, Grantsville and eligible organizations in its jurisdiction can compete for state funding to improve heritage tourism assets and programming. If the town has any questions about this or other plan recommendations related to historic properties and archaeological sites, please contact Nell Ziehl - Chief, Office of Planning, Education and Outreach, MHT at nell.ziehl@maryland.gov.

**Maryland Department of Planning Review Comments
Draft Plan**

STATE AGENCY COMMENTS

The following are state agency comments in support of MDP's review of the draft plan. Comments not included here may be submitted under separate cover, or via the State Clearinghouse. If comments from other agencies are received by MDP, the department will forward them to the town of Grantsville as soon as possible.

Attachments

Page : 11 Maryland Department of the Environment

Page : 14 Maryland Department of Natural Resources

Page : 17 Maryland Department of Housing and Community Development



**Local Plan Review: Town of Grantsville Draft Comprehensive Plan DUE, Garrett
County**

Maryland Department of the Environment – WSA/WPRPP

**REVIEW FINDING: R1 Consistent with Qualifying Comments
(MD20241112-0838)**

Please be advised, the property in MD20241112-0838 is in close proximity to Flood Zone AE (100-year Floodplain) and X (500-year Floodplain). The project coordinator(s) should follow local floodplain ordinances and Federal Emergency Management Agency’s guidelines and standards.

It is advised that the coordinator(s) consider climate resiliency, which could include but not limited to the following steps (<https://toolkit.climate.gov/>):

- Explore Hazards: Identify climate and non-climate stressors, threats, and hazards and how they could affect assets (people and infrastructure).
- Assess vulnerability and risks: Evaluate assets vulnerability and estimate the risk to each asset.
- Investigate options: Consider possible solutions for your highest risks, check how others have responded to similar issues, and reduce your list to feasible actions.
- Prioritize and plan: Evaluate costs, benefits, and capacity to accomplish each action integrating the highest value actions into a stepwise plan.
- Take action: Move forward with your plan and check to see if your actions are increasing your resilience with monitoring.

The coordinator(s) is advised to contact Dave Guignet, State National Flood Insurance Program Coordinator, of MDE’s Stormwater, Dam Safety, and Flood Management Program, at (410) 537-3775 for additional information regarding the regulatory requirements for Floodplains and Storm Surges.

The coordinator(s) is advised to contact Matthew C. Rowe, CC-P, Deputy Director of MDE’s Water and Science Administration, at (410) 537-3578 for additional information regarding Climate Change and Resiliency.



MDE Comments for Environmental Clearinghouse Project Local Plan Review: Town of Grantsville Draft Comprehensive Plan

Response Code: R-1

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land and Materials Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Solid Waste Program should be contacted directly at (410) 537-3315 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
5. Any contract specifying “lead paint abatement” must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1978 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.
6. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please Land Restoration Program at (410) 537-3437.
7. Borrow areas used to provide clean earth back fill material may require a surface mine permit. Disposal of excess cut material at a surface mine may requires site approval. Contact the Mining Program at (410) 537-3557 for further details.



Wes Moore, Governor
Aruna Miller, Lt. Governor
Josh Kurtz, Secretary
David Goshorn, Deputy Secretary

Maryland Department of Planning
301 West Preston Street
Suite 1101
Baltimore, MD 21201

Memo: MD DNR review of the Draft Grantsville Comprehensive Plan

To: Dave Cotten
cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on the Draft Grantsville Comprehensive Plan. The draft document was distributed to appropriate contacts at the Maryland Department of Natural Resources and reviewed. Overall, the plan does a good job of identifying sensitive areas and including measures to protect them. DNR offers the following specific comments:

DNR's Fishing and Boating Services has reviewed the Grantsville, Maryland Comprehensive Plan. Grantsville is located in the Casselman River watershed, which supports a popular Delayed Harvest Trout Fishing Area in the Casselman River mainstem and populations of native brook trout in several tributaries. To protect these resources, Fishing and Boating Services has the following recommendations:

Drinking water improvements (6.1.2): The Chestnut Ridge and Hillside Areas drain to an unnamed tributary to Casselman River and to Meadow Run. Both streams support populations of brook trout. Understanding that the public water supply requires expansion, Fishing and Boating Services encourages consideration for these resources when planning the locations of new water sources. Capturing water sources that may reduce springflow and/or groundwater connectivity in these drainages may have consequences for surface water flow. Careful consideration of well location and depth may limit these impacts.

Partial Build Out Scenarios (7.4): Fishing and Boating Services recommends the maintenance of undisturbed 50 foot riparian buffers around all surface waters. This will limit the impacts of development to aquatic resources in the watershed. Additionally, sections of Area 3 and Area 4 drain to Schoolhouse Run, an unnamed tributary to Casselman River, and Meadow Run. All of these streams support native brook trout populations. Minimizing new impervious surfaces and the loss of forested areas in these drainages will support continued brook trout occupancy. Fishing and Boating Services encourages the prioritization of development outside of these drainages.

Finally, Fishing and Boating Services encourages the town to direct stormwater management to focus not only on sediment control, but also temperature reduction. The plan mentions sediment reduction a number of times, but stormwater management practices aimed at the reduction of

surface water temperatures (through increased infiltration and/or subsurface treatment) would be beneficial to the cool/coldwater species occupying the streams.

DNR's Resources Assessment Service reviewed the town of Grantsville Comprehensive Plan. The town of Grantsville is located on the Casselman River – a designated Stronghold watershed for several aquatic rare, threatened, and endangered species including Stonecat, Mottled Sculpin, Striped Shiner, Johnny Darter, and Hellbender. It also supports an important recreational Coldwater fishery. Resource Assessment Service offers the following comment:

The plan as written aims to 'protect the Casselman River and its tributaries from the negative impacts of development along their banks'. This plan does a good job of summarizing the sensitive natural resources within and downstream of the town and incorporates many recommendations that, if implemented, should go a long way towards protecting aquatic resources within the Casselman. In Chapter 13 Implementation, the plan recommends to 'Tap into the riverfront as a community amenity and look into annexation opportunities around the Casselman River'. It is recommended all steps are taken to minimize impacts of impervious surfaces and stormwater runoff if any re-zoning and development occur along the Casselman River to preserve water quality and valuable aquatic resources in the vicinity and downstream of Grantsville. Riparian buffers should be created or widened along streams that harbor important ecological and recreational resources to help protect and enhance the current habitat conditions. Town planners should consider adopting a minimum 100ft buffer along each bank where possible and increasing buffer widths in areas with steep slopes along streams by 2 feet per 1% of slope (as prescribed by S. Wenger. A review of the scientific literature on riparian buffer width, extent, and vegetation. Office of Public Service and Outreach. Institute of Ecology. University of Georgia 1999). Long-term maintenance should be included in riparian reforestation plans to reduce impacts from invasive plant and animal species that could reduce tree survival and growth.

Finally, DNR's Maryland Forest Service reviewed the town of Grantsville Comprehensive Plan. They provide the following recommendations.

The Maryland Forest Service recommends implementing a Forestry Program which would promote the State Forest Action plan. The community would benefit from the addition of a town Forestry Conservation Ordinance and Tree Care Ordinance.

Programs like Tree City USA and Maryland PLANT Award could be a great way for the city to receive recognition for their tree planting and care efforts. Maryland Forest Service would recommend joining if possible. Maryland PLANT Award has similar criteria to Tree City USA. After reading through this plan, Maryland Forests Service has concluded that Grantsville would be a good candidate for that as well.

Maryland Forest Service agrees with recognition that natural buffers improve water quality, and encourage partnering with Garrett County to better learn about and utilize best management practices.

Maryland Forest Service can also help identify sites and programs that can assist.

The Maryland Forest Service Supports the implementation of a forestry program to promote forest health. Maryland Forest Service and Maryland Department of Agriculture staff can assist the town in identifying prevalent forest health needs such as emerald ash borer (EAB), invasive and noxious plants, and encouraging the town's use of native plant species in landscaping projects. Maryland Forest Service also encourages staff awareness and training of invasive plant species identification and removal options.

[USFS Wildland urban interface](#) is an important concept to consider. Grantsville was reviewed based on this map. At this time, urban wildland interface is not significant, however with changing climate Grantsville would benefit with further review and addition of an urban wildland protection plan. Reach out to Maryland Forestry Fire Staff for more information.

Once again, thank you for the opportunity to provide comments. If you have any questions about these comments or would like further information, please do not hesitate to contact me at 443-534-4151 or christine.burns1@maryland.gov.

Best,
Christine Burns



WES MOORE
Governor
ARUNA MILLER
Lt. Governor
JACOB R. DAY
Secretary
JULIA GLANZ
Deputy Secretary

December 10, 2024

Mr. David Cotton, Director
Western Maryland Regional Office
Maryland Department of Planning
Western Maryland Regional Office
113 Baltimore Street
Suite 302
Cumberland, MD 21502

Dear Mr. Cotton:

Thank you for the opportunity to review and comment on the Town of Grantsville Comprehensive Plan (the "Plan"). When reviewing plans, the Maryland Department of Housing and Community Development ("DHCD") comments on items for which political subdivisions can strategically leverage DHCD's resources to accomplish their housing and community development goals. DHCD also reviews comprehensive plans for consistency with relevant statutes and, if appropriate, Sustainable Communities Plans.

Overall, DHCD staff were impressed with the quality of the Plan. Staff in the DHCD Division of Neighborhood Revitalization reviewed the Plan and provided the following comments, which are meant to help realize the Plan's goals. We present the following in no particular order:

1. The housing and economic development components of the Plan are broadly consistent with and build upon the Sustainable Communities Plan. As you know, because of Grantsville's relatively small size (968 residents in the 2020 census), Grantsville is combined with seven other municipalities as for purposes of the Sustainable Community designation. The town identified increasing homeownership and affordable rental housing as goals and identifies DHCD programs that can assist.
2. The Plan identifies a need to revitalize the community through adaptive reuse for which the DHCD's Community Legacy Program grants could assist. Planning staff can learn more about Community Legacy online at <https://dhcd.maryland.gov/Communities/Pages/programs/CL.aspx> or contact Sara Jackson, Regional Project Manager].
3. The Plan identifies a goal to support the vitality of its downtown, including the Main Street. DHCD's Maryland Facade Improvement Program (MFIP) provides funding for aesthetic improvements to the exteriors of businesses located in Maryland's Sustainable Communities in order to stimulate local economic activity and support community development. Planning staff can learn more about MFIP online at <https://dhcd.maryland.gov/Communities/Pages/StateRevitalizationPrograms/MFIP.aspx> or by contacting Sara Jackson, Regional Project Manager].



MARYLAND DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
7800 HARKINS RD • LANHAM, MD 20706 • DHCD.MARYLAND.GOV
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4. The Plan identifies a growing senior population. DHCD can assist with home repairs that improve comfort, livability, and accessibility for homeowners through its Special Loan Programs. Planning staff and residents can learn more about these programs at <https://dhcd.maryland.gov/Residents/Pages/SpecialLoans.aspx> or contact the program directly at 301-429-7409 or DHCD.SpecialLoans@maryland.gov.
5. The Plan does not show that Grantsville has conducted a point-in-time count to identify the total number of people experiencing homelessness in Grantsville, and the Plan does not identify goals or actions regarding services for people experiencing homelessness. For information on DHCD's programs addressing homelessness, please see more online at <https://dhcd.maryland.gov/HomelessServices/Pages/GrantFunding.aspx> or contact the Homelessness Solutions Program Manager, Suzanne Korff, at 410-209-5850 or Suzanne.Korff@maryland.gov. Persons experiencing homelessness who need assistance should contact HRDC Homeless Transitional Housing at 301-777-8286.
6. The Plan indicates that 20 percent of residents in Grantsville have incomes below the federal poverty line. The Town of Grantsville, or non-profits active in Grantsville may be eligible to apply for discretionary Community Services Block Grant (CSBG) funds administered by DHCD in order to provide services for low-income individuals and families at or below 125% of poverty. Planning staff can learn more about CSBG programs online at <https://dhcd.maryland.gov/Communities/Pages/programs/CSBG.aspx> or contact the Poverty Solutions Team at 301-429-7525 or csbg.dhcd@maryland.gov.
7. The Plan identifies a need for affordable housing, with 36 percent of homeowners and 50 percent of renters spending more than 30 percent of their income on housing. If planning staff want to support further affordable housing development with LIHTC or other DHCD programs, information is available online at <https://dhcd.maryland.gov/HousingDevelopment/Pages/lihtc/default.aspx> or contact Edward Barnett, Director of Rental Lending, at 301-429-7740 or edward.barnett@maryland.gov.
8. Grantsville is within a Maryland Mortgage Program ("MMP") target area and residents therefore have enhanced eligibility for the state's homeownership incentives. Planning staff and residents may learn more about Maryland's homeownership programs at <https://mmp.maryland.gov/pages/default.aspx>.
9. The Plan identifies developing commercial space along the Town's Main Street Program as a need (Observation 5). The Town may want to explore Main Street designation as a tool for commercial revitalization. More information on the revitalization benefits associated with this designation can be found online at <https://dhcd.maryland.gov/communities/pages/programs/mainstreet.aspx>.
10. The Plan identifies a need to support businesses in the town's core. Info on DHCD's support for businesses can be found online at <https://dhcd.maryland.gov/Business/Pages/SmallBusinesses.aspx> or by contacting Mike Haloskey, Director of Business Lending Programs, at 301-429-7523 or Michael.Haloskey@maryland.gov.



11. The Plan identifies a need for infrastructure improvements that increase overall safety. DHCD's Community Health and Safety Works program is a potential resource to support these projects. More information on the program can be found online at <https://dhcd.maryland.gov/Communities/Pages/csw/default.aspx> or by contacting Eric Borchers, Project Manager, at 410-209-5833 or eric.borchers@maryland.gov.
12. The Plan identifies a need to increase energy efficiency for buildings, including single-family and multifamily homes. DHCD has several programs that support energy efficiency, and more information on those programs can be found online at <https://dhcd.maryland.gov/Pages/EnergyEfficiency/default.aspx>.
13. The Plan identifies a need to fill vacant commercial properties. DHCD's Project Restore can be leveraged to attract and retain businesses that occupy vacant properties. More information on the program can be found online at <https://dhcd.maryland.gov/Pages/ProjectRestore/default.aspx> or by contacting Kristin Dawson at 410-209-5847 or kristin.dawson@maryland.gov.
14. While the Plan commits to supporting fair housing (Section 9.1.5), the Plan's Housing Element does not include an assessment of fair housing. Maryland House Bill 90 (2021) requires, effective January 1, 2023, that comprehensive plans include an assessment of fair housing. For technical assistance in development of the Plan's Housing Element, please contact staff at the Maryland Department of Planning.

We in the Division of Neighborhood Revitalization look forward to continuing our productive partnership with the Town of Grantsville in its future initiatives. Again, thank you for the opportunity to comment on the Plan. If you have any questions regarding the comments above, please contact me at john.papagni@maryland.gov or (301) 429-7670.

Sincerely,



John Papagni
Program Officer
State Revitalization Programs

Cc: Joseph Griffiths, Maryland Department of Planning
Rita Pritchett, Maryland Department of Planning
Olivia Ceccarelli, Maryland Department of Housing and Community Development

