

December 29, 2025  
Mr. John Jacobs, Chairman  
City of Cumberland Planning Commission  
57 N Liberty Street  
Cumberland, MD 21502

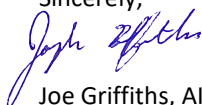
Dear Mr. Jacobs,

Thank you for the opportunity to comment on the draft Cumberland 2045 Comprehensive Plan (Draft Plan). The Maryland Department of Planning (MDP) believes good planning is important for efficient and responsible development that addresses resource protection, adequate public facilities, housing, community character, and economic development. 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.

MDP 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, Disabilities, and Housing and Community Development. To date, we have received comments from the Departments of Housing and Community Development, Natural Resources, and Transportation. These comments are 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 city's public hearing record. When the Draft Plan is adopted, please send a PDF copy of the final document to [mdp.planreview@maryland.gov](mailto:mdp.planreview@maryland.gov). If you have any questions regarding these comments, please email MDP's Western Region Regional Planner, Korey Layman, at [korey.layman@maryland.gov](mailto:korey.layman@maryland.gov).

Sincerely,



Joe Griffiths, AICP  
Director, Planning Best Practices

Enclosures: Review Comments Cumberland 2045 Draft Plan

cc: Jeff Silka, City Administrator; Ruth Davis-Rogers, Historic Preservation Planner, City of Cumberland  
Jim Squires, Director, Allegany County Planning and Zoning  
David Cotton, Director, Western Maryland Regional Office, MDP



**Maryland Department of Planning  
Review Comments  
December 29, 2025  
City of Cumberland Draft Comprehensive Plan**

The Maryland Department of Planning (MDP) received the Draft Comprehensive Plan from the City of Cumberland (Draft Plan) on November 3<sup>rd</sup>, 2025. 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 city of Cumberland.

**Maryland State Principles – Synopsis**

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Land Use Article Section 1-201 requires Maryland jurisdictions with planning & zoning authority to implement the state's eight Planning Principles (Principles) through a comprehensive plan. The Principles reflect the state's ongoing aspiration to develop and implement sound growth and development policy. The Principles address: land; transportation; housing; economy; equity; resilience; place; and ecology.

The city acknowledges the Principles on page 6 of the Draft Plan and addresses the principles throughout the document. The goals and objectives put forward by the city align with the Principles, with the Principles 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**

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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

- One of the city's strategy steps, stated on Page 19, is to update zoning and development standards to welcome modular and prefabricated homes. This strategy aligns with the Housing Expansion & Affordability Act, enacted by the State of Maryland in 2024, which requires local jurisdictions to allow manufactured homes and modular dwellings in areas zoned for single family housing.
- Potential Strategy 2 on page 19 calls for the elimination of process-related requirements such as traffic impact assessments, stating that congestion is not as significant of a concern within the city due to population loss. While likely true in most cases, the Draft Plan does state that congestion issues are present within the area of the I-68 viaduct. MDP recommends the city consider implementing a waiver/review process (as described in Potential Strategy 5) for traffic impact assessments within the I-68 viaduct area as shown on Page 50, rather than the outright elimination of traffic impact assessments within this area.

### Housing Element – Synopsis

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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

- MDP recommends beginning the housing element by summarizing the requirements of Land Use Article, § 3-114. Doing so will clearly communicate state requirements to residents and other stakeholders and provide a basis for analysis and strategies that occur later within the Housing element.
- The Maryland Code requires that a municipal comprehensive plan housing element address the need for affordable housing within the jurisdiction, including low-income housing and workforce housing (Land Use § 3-114). It defines low-income housing as "housing that is affordable for a household with an aggregate annual income that is below 60% of the area median income" (Land Use § 3-114). It defines workforce housing as (1) rental housing that is affordable for a household with an aggregate annual income between 50% and 100% of the area median income or (2) homeownership housing that is affordable to a household with an aggregate annual income between 60% and 150% of the area median income (Housing and Community Development § 4-1801). Addressing the need for affordable housing would also assist in the plan's implementation of Maryland's Planning Principle for housing, which is to "enable a mix of quality housing types and affordability options to accommodate all who want to live in the state" (Land Use § 1-201).

While the Draft Plan acknowledges a need for affordable housing, it does not present any data on the affordability or condition of housing in Cumberland. To meet its statutory requirement, MDP recommends that Cumberland include information from Maryland's [Housing Data](#)

[Dashboard](#), which includes data specific to the community. MDP also recommends that Cumberland find data specific to the town using the [Housing Needs Assessment tool provided by Local Housing Solutions](#). For relevant data and actions recommended by the State of Maryland for communities in Western Maryland, MDP recommends reviewing pages 57–63 of the [2020 Maryland Housing Needs Assessment & Strategic Plan](#).

- The Maryland Code requires that local jurisdictions affirmatively further fair housing in their housing and urban development programs (Land Use § 3-114). To affirmatively further fair housing means taking meaningful actions aimed at combating discrimination to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to housing and opportunity based on protected characteristics (Housing and Community Development § 2-401). To this end, the plan is required to include an assessment of fair housing (Land Use § 3-114).

The Draft Plan neither acknowledges nor complies with its statutory requirement to assess fair housing in the community. Land Use § 3-114 does not define what an assessment of fair housing entails, but MDP recommends referring to [its guidance on affirmatively furthering fair housing](#), which describes fair housing best practices and how jurisdictions might consider using them in their housing elements. In particular, MDP has published a [self-assessment](#) for communities like Cumberland with populations too small to conduct a quantitative assessment of fair housing using publicly available data. MDP recommends that Cumberland use this self-assessment to guide its plans and any future public engagement on housing in the community.

### **Sensitive Areas Element – Synopsis**

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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**

- As mentioned above, the Draft Plan includes language regarding the Principles. Pertaining to the Resilience Principle, as state agencies gradually produce materials that further define resilience, MDP recommends that the city add further details about its goals for advancing resilience over the coming years
- The Draft Plan identifies two Ecologically Sensitive Areas (ESAs) within the city. To protect these areas, the city utilizes multiple layers of protection, including rural legacy areas, zoning codes, conservation zones, and Viewshed Protection Overlay Zones. The implementation of these measures will ensure that the city's sensitive areas are aligned and contiguous with sensitive areas identified by Allegany County.
- MDP commends the city for its intent to include wildlife passages within the design of the River Park at Canal Place, as stated on Pages 40-41. As of July 1<sup>st</sup>, 2025, [HB0731](#) requires that local jurisdictions consider wildlife movement and habitat connectivity when enacting, adopting,

amending, or executing a plan. MDP recommends including a graphic and/or additional detail, further explaining the proposed wildlife crossing within the River Park project.

### **Transportation Element - Synopsis**

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The transportation element is required to 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**

- The Transportation Element is not included as a separate element in the Draft Plan, but relevant information is included in the Infrastructure, Community Facilities and Public Services, and The Natural Environment chapters. MDP suggests including it as either a separate element, with a clear vision developed through input from Cumberland stakeholders including goals and strategies, or more clearly indicate that transportation information mixed throughout the Draft Plan constitutes the city's transportation element. Additional information on trip patterns, existing infrastructure, and future needs would help create a more complete element.
- The Potential Strategies section of the Land Use chapter (page 19) includes "Reduce most off-street parking requirements. Throughout Cumberland parking supply is ample and the market can determine if and how much parking should be provided." MDP agrees with this strategy and suggests it could reduce costs for new developments and increase walkability.
- The Draft Plan identifies multiple bridges and tunnels which pose ongoing issues for the city. MDP recommends the city continue to consider the impacts that extreme weather and human-induced threats pose on these assets. As a document that informs requests for state funding, the Draft Plan may be improved by including analysis and crafting strategies highlighting the opportunities and growth contingent upon successful proposed capital projects.
- According to the Draft Plan (page 47), much of Cumberland's transportation services are comprised of roads and vehicles with very limited transit and intercity services.
  - 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-city 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 Cumberland residents.
- The Draft Plan briefly summarizes the transit services (AllTrans, BayRunner Shuttle, and Amtrak) that serve Cumberland. MDP suggests including coverage areas, existing station conditions, and ridership information to inform potential service or development density.

## Maryland Department of Planning Comments – City of Cumberland Draft Comprehensive Plan

- The Draft Plan could also discuss the existing Amtrak station, the potential for long-term MARC service, and opportunities to leverage the station area for Transit Oriented Development.
- Pages 30-41 of the Draft Plan include several opportunity and investment areas that prioritize sidewalk repair. MDP recommends using [Maryland SHA Bicycle and Pedestrian Design Guidelines](#) as a reference. Including a sidewalk and bicycle trail gap analysis could help identify mission links and prioritize future improvements. Maryland provides funding and technical support for local pedestrian and bicycle facility improvements via MDOT's active transportation programs.
  - In addition, please review the Federal Highway Administration (FHWA)'s report on "[Small City and Rural Multimodal Networks](#)," which provides best practice examples to enhance pedestrian and bicycle networks in rural communities and small cities.
- The Local Recreation and Parks section discusses the GAP and C&O Canal shared-use trails. The Draft Plan should include connections to these trails and additional bicycle infrastructure as needed to align with Maryland's statewide bicycle and trails plans. MDOT grant programs, such as [Maryland Bikeways](#), could support these improvements and help meet the goal to "Connect Cumberland Communities to regional parks and recreation assets."
- MDP suggests adding an Electric Vehicle (EV) section to page 47 of Chapter 3, where the plan discusses transportation infrastructure. EV use is growing, and the Draft Plan could describe current conditions, existing charging infrastructure, and plans to expand EV offerings, including charging stations and EV parking.

### Water Resources Element – Synopsis

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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 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

- A 2011 water billing study indicated that the average daily household water use was 101 GPD, or 40% of MDE's 250 GPD average daily household standard. Has the city considered including how/whether current water capacity can meet demand projections through the 2045 planning period, including water supply demands from other users that utilize Cumberland's water system?

- Cumberland has a combined wastewater and stormwater system, resulting in combined sewer overflows (CSOs) during heavy rain events and untreated wastewater flowing into North Branch or the streams and creeks that feed it. The city anticipates the need to mitigate increasingly heavy flows from more frequent and intense storms through the planning period; the Draft Plan states that the city needs the adjacent Bedford County, PA and the State of PA to meet their obligations under various multistate Chesapeake Bay agreements toward this end. The city proposes establishing a comprehensive Infrastructure Asset Management System and continuing methods to reduce CSOs. Has the city considered including how/whether current wastewater capacity can meet demand projections through the 2045 planning period, including wastewater demands from other users that utilize Cumberland's system?
- The Draft Plan highlights the anticipation of more frequent and intense extreme weather events. Through proactive efforts, the city has begun separating the combined sewer system and upgrading stormwater and surface water treatment infrastructure. Additionally, the updated [FEMA FIRM](#) maps have provided further context on how flooding will continue to pose risk in the future. While planning for floods most commonly considers 100-year floodplains, MDP recommends the City of Cumberland consider the 500-year floodplain and stormwater events in upcoming planning for capital projects.
- The Draft Plan acknowledges that the city is vulnerable to increasing storm frequency, which must be considered in future planning and resource prioritization. The Draft Plan does not provide demand and capacity comparison tables for water or wastewater supply. Has the city considered providing tables to demonstrate current and future EDUs and non-residential uses compared to water and wastewater capacity and demand?
- If future land use will include increases in use intensity and development/redevelopment density, has the city 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 city considered how the increases in intensity/density will impact storm water, nutrient loading, and climate change considerations? Also, the draft plan does not discuss climate change adaptation. [MDP's Water Resources Element \(WRE\) Guidance Update](#) can be used to guide the city regarding best practices for water resources planning, including climate change adaptation.
- The Draft Plan does not appear to include a quantitative analysis of the municipality's anticipated growth, including projection of future growth in population, resulting land needs (based on a capacity analysis of areas selected for future municipal annexation and growth), and the effects of growth on infrastructure and natural features. It is difficult to analyze water resources planning without a future population projection and other details from the MGE.
- MDP commends the city for its strategy of establishing a comprehensive Infrastructure Asset Management System as stated on page 45 of the Draft Plan. The Asset Management System will greatly assist the city in taking a more proactive approach towards preventative maintenance. MDP recommends that the city look to complete a Preliminary Engineering Report geared towards improvements to the city's water and wastewater systems. An updated Engineering

Study will ensure that the city is populating its asset management system with data that is accurate and up to date.

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

- 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

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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 city should continue to update their goals and outcomes as they become available or completed. MDP encourages the city to submit these updates during the five-year reporting update that is submitted to our department as per [Land Use Article Section 1-207\(c\)\(6\)](#). MDP developed a [five-year report form template](#) that the city may use to meet this requirement.
- Goals and objectives are detailed throughout the Draft Plan, but hot topic areas or additional goals and objectives that arise should be expanded and included later in the implementation matrix during future plan updates or amendments.



### **Land Use Element - Synopsis**

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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 assist the reader in correlating land uses and corresponding map colors, MDP recommends that the city considers adding a key to both the Land Use Map and the Future Land Use Map found on pages 14 and 17 of the Draft Plan, respectively.
- The Draft Plan identifies new categories of land use which will be implemented across the city. One of the new designations is the Riverfront Civic category, focused on the Canal Place area of the city. The city is encouraged to describe how resilience will be included in the Riverfront Civic land use category or explain how resilience will be addressed in other ways following a major capital project. Providing further details on the River Park project is also a good opportunity to highlight where long-term resilience value may be captured within the new land use category, emphasizing a suitable and lasting use.
- The city should consider the use of a floating zone in newly proposed land use categories where historic or cultural resources exist. This would provide the city with ample opportunity to review proposed development within the district and assist the city in ensuring the extension of Cumberland's built-form, character, and historic city scale into the proposed land use categories.
- The city 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. This would allow the city to grow as the Draft Plan ages and limit the need for future comprehensive plan amendments.

### **Community Facilities Element - Synopsis**

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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**

- MDP commends the city for incorporating public feedback received relating to neighborhood-oriented parks, playgrounds, and the accessibility of the GAP trail and the river from local neighborhoods into the Draft Plan as Strategies 1 and 2 on Page 58.
- Page 24 of the Draft Plan mentions the city's desire to develop a 3-mile loop trail to accompany the planned River Park at Canal Place and to tie in to existing intra-state bicycle trails. In this

section, the Draft Plan also mentions that property acquisition could enhance walkability and safety within the project area. MDOT's [Recreational Trails Program \(RTP\)](#) could assist the city with the development and maintenance of the proposed trail, as well as the acquisition of easements and property for recreational trails and their accompanying corridors.

### **Municipal Growth Element - Synopsis**

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The municipal growth element (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**

- According to the Municipal Growth section (page 18) of the Land Use chapter, annexation is difficult for the city because many unincorporated adjoining properties are already served by the city's water and sewer, so there is little incentive for the properties to annex into the city. A growth area is identified along the eastern municipal boundary on the Page 18 map. Although the Draft Plan explains that population has decreased and has (more recently) stabilized, it does not specify population projections or growth for specific types of land use (e.g. residential, commercial, industrial) throughout the planning period (or for any future period). These projections are necessary for the city to understand and plan for water and sewer demand through 2045. Has the city considered developing population and land use projections to demonstrate how/whether water and sewer capacity can meet demand through the planning period?
- How does the city anticipate calculating future growth, and what are the intended uses of the future growth area specified on page 18? As mentioned in the previous WRE section, it is difficult to analyze water resources planning without an anticipated future population projection.
- If the city intends to complete and include a more detailed anticipated growth analysis based upon the suggestions mentioned in previous comments, MDP recommends the city consider creating a section within the Draft Plan that consolidates information and analysis pertaining to growth, the city could then explain how this section impacts the other elements addressed within the Draft Plan.

### **Growth Tiers – Synopsis**

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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**

- The city administratively adopted a Growth Tier Map on December 18, 2012, which identified the entire town as Tier I, and identified the entire municipal growth area as Tier II. The Growth Tier Map was incorporated into the city's comprehensive plan as Appendix A of the 2013 Comprehensive Plan City-Wide Element (Volume 2 of 2). However, the Growth Tier Map is not included nor referenced in the Draft Plan. Has the city considered including the Growth Tier Map?
- Note that solar facilities larger than 5 MW are not allowed under Maryland law within areas designated as Tier II.

### **General Plan Comments/Recommendations**

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MDP encourages the city 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. Cumberland's implementation report will be due five years after Draft Plan adoption. If the city 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.

**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 city of Cumberland as soon as possible.

**Attachments**

Maryland Department of Housing and Community Development

Maryland Department of Natural Resources

Maryland Department of Transportation

November 14, 2025

Mr. Dave 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 draft Cumberland 2045 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 consistent with and build upon the Sustainable Communities Plan, which was approved April 13, 2022.
2. The Plan identifies a need to revitalize the community through adaptive reuse, including historic structures 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, [sara.jackson@maryland.gov](mailto:sara.jackson@maryland.gov)
3. The Plan identifies a goal to support the vitality of its downtown. 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, [sara.jackson@maryland.gov](mailto:sara.jackson@maryland.gov).



4. The Plan identifies a goal to support sustainable housing that supports vulnerable populations. DHCD can assist with home repairs that improve comfort, livability, and accessibility for homeowners through its Home Repair Programs. Planning staff and residents can learn more about these programs at <https://dhcd.maryland.gov/Energy-Home-Repair/pages/homeowner-loans/default.aspx> or by calling 301-429-7409 or [DHCD.SpecialLoans@maryland.gov](mailto:DHCD.SpecialLoans@maryland.gov).
5. The Plan identifies a need to address blighted properties for which DHCD's Strategic Demolition Fund (SDF) grants could assist. Planning staff can learn more about SDF online at <https://dhcd.maryland.gov/Communities/Pages/programs/SDF.aspx> or by contacting Sara Jackson, Regional Project Manager, [sara.jackson@maryland.gov](mailto:sara.jackson@maryland.gov).
6. The Plan does not show that Cumberland has conducted a point-in-time count to identify the total number of people experiencing homelessness in Cumberland, 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](mailto:Suzanne.Korff@maryland.gov). Persons experiencing homelessness who need assistance should call 211 to be connected with local resources.
7. The Plan identifies the community's needs with respect to income and poverty. Cumberland or non-profits active in Cumberland 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](mailto:csbg.dhcd@maryland.gov).
8. The Plan identifies a need for affordable housing, including workforce and low-income housing. A portion of Cumberland is within a HUD Qualified Low-Income Housing Tax Credit (LIHTC) Census Tract and currently has 13 multifamily sites serving different populations. 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](mailto:edward.barnett@maryland.gov).
9. A portion of Cumberland 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>.



10. Cumberland's downtown has been designated as a Maryland Main Street. More information on the revitalization benefits associated with this designation can be found online at <https://dhcd.maryland.gov/communities/pages/programs/mainstreet.aspx>.
11. 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 the Business Lending Team at 301-429-7408 or email: [dhcd.businesslending@maryland.gov](mailto:dhcd.businesslending@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/Energy-Home-Repair/pages/homeowner-grants/default.aspx>.
13. 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 Carter Reitman, Lead Housing Planner at the Maryland Department of Planning, [carter.reitman2@maryland.gov](mailto:carter.reitman2@maryland.gov).

We in the Division of Neighborhood Revitalization look forward to continuing our productive partnership with the City of Cumberland 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](mailto:john.papagni@maryland.gov) or 301-429-7670.

Sincerely,



John Papagni  
Program Officer  
Division of Neighborhood Revitalization

Cc: Joseph Griffiths, Maryland Department of Planning  
Rita Pritchett, Maryland Department of Planning  
Sara Jackson, DHCD Division of Neighborhood Revitalization  
Olivia Ceccarelli, DHCD Division of Neighborhood Revitalization





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

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

Memo: MD DNR comments on City of Cumberland Draft Comprehensive Plan

To: David Cotton  
cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on the City of Cumberland Draft Comprehensive Plan. The draft document was distributed to appropriate contacts at the Maryland Department of Natural Resources and reviewed. DNR offers the following comments:

The reviewers found the City of Cumberland's Comprehensive Plan to be in compliance with the Department's goals of conserving and preserving land, protecting resources and developing parks for the benefit of the community. Note that pages 60-64 appear to be still in draft form. This reviewer was unable to locate a park inventory list and that would be helpful to identify the City's parks and recreational services. Also, the current and future land use maps depicted as Figures 1 and 2, respectively, are lacking a legend, which would allow for clearer understanding of the various land uses. Maps that indicate the boundary of Wills Mountain State Park are different from the boundary shown on the Merlin Online public mapping website.

Generally, the draft plan could be more specific. The plan (specifically Chapter 4) spells out Goals and Objectives including 'Protect natural resources and sensitive ecological areas as both the headwaters of the Chesapeake Bay and the gateway for Western Maryland's outdoor economy', but the plan does not include specific actions that are proposed to attain this goal. Recommend that the city planners include a description of specific actions or best management practices they plan to implement, an implementation timeline, and a description of where they plan to focus first (priority areas where efforts could most benefit stream conditions).

It is recommended all steps are taken to minimize impacts of impervious surfaces and stormwater runoff to preserve water quality and valuable aquatic resources in the vicinity and downstream. Riparian buffers should be created or widened along streams where it is possible to improve stream bank stability, water filtration, stream shading, and to enhance the current habitat conditions. City 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.

The City of Cumberland contains portions of Wills Creek and Evitts Creek - two tributaries to the North Branch Potomac River. Both stream systems harbor important biological resources. Wills Creek is a designated stronghold watershed with historical records of the state Threatened freshwater mussel Triangle Floater. Evitts Creek contains important coldwater trout fisheries. These biological stream resources could benefit from management practices aimed at improving water quality, physical habitat quality, and stream connectivity. Land protection within these catchments, reforestation and riparian buffer restoration, stormwater retrofits, and impervious surface treatments would all be beneficial in these watersheds.



The Maryland Forest Service agrees with Cumberland's recognition that forested streams and rivers are vital to keeping both the Potomac River and Chesapeake Bay in good health. Maryland Forest Service employees can identify and assist in implementing planted buffers to improve forest and water health.

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](mailto:christine.burns1@maryland.gov).

Best,  
Christine Burns

December 16, 2025

Ms. Susan Llareus  
c/o Rita Pritchett  
Maryland Department of Planning  
120 E. Baltimore Street, Suite 2000  
Baltimore MD 21202

Dear Ms. Susan Llareus:

Thank you for coordinating the State of Maryland's comments on The City of Cumberland, Maryland 2025 Comprehensive Plan (the Plan). The Maryland Department of Transportation (MDOT) offers the following comments on the Plan for consistency with the State of Maryland and MDOT's goals and objectives:

**General Comments**

- In general, the Plan is consistent with MDOT plans and programs. The MDOT supports the goals of the Plan, which include:
  - Establish a land use plan that lays out a vision for the future of Cumberland while respecting the historical community structure and taking advantage of opportunities for growth and revitalization.
  - Bring infrastructure to a state of good repair and maintain it as such.
  - Take a broad view of opportunities related to bridge reconstruction and rehabilitation.
  - Support and create new assets to drive regional and national tourism such as the GAP Trail. River Park at Canal Place and Wills Mountain State Park.
- Shifting transportation mode choice towards transit and active transportation, shortening automobile trips, and increasing carpooling and vanpooling, are critical components to building efficient, equitable, and sustainable places, and is also essential to accommodating Maryland's changing demographic composition. The MDOT manages several active transportation programs:
  - Transportation Alternatives (TA) Program: a reimbursable, federally funded program for local sponsors to complete community projects designed to strengthen the intermodal transportation system. The program provides funding for projects that enhance the cultural, aesthetic, historic, and intermodal transportation system. The program can assist with projects that create bicycle and pedestrian facilities, restore historic transportation buildings, convert abandoned railway corridors to pedestrian trails, mitigate highway runoff, and other transportation-related enhancements. Project sponsors are required to provide a minimum 20% of the total project as a match.

- Recreational Trails Program: a federally funded program that the State Highway Administration (SHA) administers on a reimbursement basis. Like the TA Program, the Recreational Trails Program may reimburse a local project sponsor up to 80% of the project's total eligible costs to develop community-based, motorized, and non-motorized recreational trail projects.
- The MDOT's Kim Lamphier Bikeways Network Program: a program that allocates State transportation funds administered by the MDOT Secretary's Office to promote biking as an alternative transportation mode.
- For more information on MDOT's active transportation planning and programming efforts, please see our Maryland's Bicycle and Pedestrian Plans and Programs web page:  
<https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=24>.
- Commuter Choice Maryland is MDOT's Travel Demand Management (TDM) program, and it could be incorporated into the Plan as a strategy to support the plan. The program offers an extensive menu of commuter transportation services, such as ridesharing and incentives. Please visit the Commuter Choice Maryland web site at <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=29> for more information.
- The MDOT supports continued improvements to expand and enhance transit options. Please coordinate with the Maryland Transit Administration (MTA) Office of Statewide Planning for any coordination regarding regional transit and the coordination of MDOT supported locally-operated transit services (LOTS). The MTA also supports park and ride (with SHA), demand response services, paratransit, medical services, and senior-center transportation options. For regional transit planning, please contact Mr. Stephen Miller, Chief of Strategic Planning, via email at [SMiller6@mdot.maryland.gov](mailto:SMiller6@mdot.maryland.gov) or phone at 410-767-3869. For local transit service planning, please contact Mr. Jason Kepple, MTA Regional Planner, via email at [Jkepple@mdot.maryland.gov](mailto:Jkepple@mdot.maryland.gov).
- A Transit Oriented Development (TOD) Program was established within MDOT to provide services including identifying potential TOD opportunities and evaluating existing and future needs of public transportation facilities. For TOD related data resources please visit the Transit-Oriented Development in Maryland web page: <https://data-maryland.opendata.arcgis.com/pages/tod>

### **Chapter 3: Infrastructure, Community Facilities and Public Services Comments**

- It is recommended to refer to Transportation System Management and Operations (TSMO) strategies that focus on operational improvements that can maintain and even restore the performance of the existing transportation system before extra capacity is needed (per the Federal Highway Administration).

- Relative to MDOT implementing resilience strategies and initiatives to withstand the impacts of climate change on transportation infrastructure, please review the SHA Climate Change Vulnerability Viewer online ArcGIS web application map: <https://www.arcgis.com/apps/webappviewer/index.html?id=86b5933d2d3e45ee8b9d8a5f03a7030c>. The map showcases geospatial data products related to climate change and the potential impacts on State transportation infrastructure. The purpose of this application is to support efforts to avert and mitigate potential impacts of sea-level rise that result from global climate change on State roadway and bridge infrastructure. To review other MDOT Climate Change programs and to access this information please visit: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=169>.
- It is recommended that any roadway improvements include appropriate bicycle and pedestrian accommodation. For all roadway and sidewalk improvements to SHA roadway facilities, please provide for and maintain bicycle facilities as well as full ADA-compliant pedestrian facilities. To determine an appropriate bicycle accommodation, please reference:  
[https://www.mdot.maryland.gov/OPCP/MDOT\\_State\\_Bike\\_Ped\\_Master\\_Plan\\_FULL\\_FINAL\\_VERSION.pdf](https://www.mdot.maryland.gov/OPCP/MDOT_State_Bike_Ped_Master_Plan_FULL_FINAL_VERSION.pdf) Appendix D: Bicycle Facility Selection Guide of the 2050 Maryland Bicycle & Pedestrian Master Plan.
- Consider adopting the MDOT's Complete Streets initiative. The Complete Streets initiative identifies a range of options for multimodal transportation, which includes active transportation (i.e., human-powered mobility such as biking or walking) during roadway improvement delivery. To review other resources and access this information, please visit: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=207>.

Thank you again for the opportunity to review the Plan. If you have any additional questions or concerns, please do not hesitate to contact Mr. Ryan Iacaruso, Transportation Planner, MDOT Office of Planning, Programming, and Project Delivery (OPPPD) at 410-230-6614, or via email at [riacaruso@mdot.maryland.gov](mailto:riacaruso@mdot.maryland.gov). Mr. Iacaruso will be happy to assist you.

Sincerely,



Geoff Anderson  
Chief, OPPPD, MDOT

cc: Mr. Ryan Iacaruso, Transportation Planner, OPPPD, MDOT  
Mr. Jason Kepple, Regional Planner, MTA  
Mr. Shawn Kiernan, Regional Planner, OPPPD, MDOT  
Mr. Stephen Miller, Chief of Strategic Planning, MTA