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May 29, 2025

Patricia Galloway, Chair
Planning Commission
Town of Emmitsburg
300A S. Seton Avenue, Unit 1
Emmitsburg, MD 21727

Dear Chair Galloway:

Thank you for the opportunity to comment on the 2025 Envision Emmitsburg Draft Comprehensive Plan (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 comprehensive 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 (MHT) and the Departments of Transportation, Environment, Natural Resources, Commerce, Department of Disabilities, and Housing and Community Development. To date, we have received comments from the Department of Environment, Department of Housing and Community Development, Department of Natural Resources. MHT also shared a list of grant funding sources, which is included with this review as a spreadsheet. 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 comprehensive plan, and to any future plans, ordinances, and policy documents that are developed.

Please feel free to contact me or Susan Llareus, Maryland Capital area Regional Planner at susan.llareus@maryland.gov.

Sincerely,

Joseph Griffiths, AICP
Director, Planning Best Practices

Enclosures: MDP Review, 2025 Envision Emmitsburg Draft Comprehensive Plan
Model Sustainable Growth Principles Comprehensive Plan Insert
MHT Grant Funding Sources

cc: Najila Ahsan, Town Planner
Deborah Carpenter, AICP, Director, Frederick County Division of Planning & Permitting
Susan Llareus, Maryland Department of Planning



**Maryland Department of Planning
Review Comments
2025 Envision Emmitsburg Draft Comprehensive Plan
Undated, submitted April 3, 2025**

The Maryland Department of Planning (MDP) received the Draft Envision Emmitsburg Comprehensive Plan, dated 2025 (Draft Plan) from the Town of Emmitsburg on April 3, 2025. These comments are offered as suggestions to improve the Draft Plan and better address the statutory requirements of the Land Use Article (LUA). Maryland Historic Trust has reviewed the plan and stated that they have no concerns. 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.

2025 Legislation Impacting Local Planning

MDP identified the following bills, adopted by the General Assembly during the 2025 session, that impact local planning, implementation, and reporting. MDP cannot determine at this time how they may impact Emmitsburg, but the department wants to make the town aware of them. In partnership with other state agencies, MDP is analyzing the bills and will be developing guidance.

Local Land Use Reporting

- [HB 1193](#) - Maryland Housing Data Transparency Act

Energy

- [SB 931/HB 1036](#) - Renewable Energy Certainty Act
Natural Resources and Comp Plans, effective July 1, 2015
- [HB 731](#) - Wildlife - Protections and Highway Crossings, effective July 1, 2025

Housing

- [HB 1466/SB 891](#) Accessory Dwelling Units - Requirements and Prohibitions, effective October 1, 2025

Draft Plan Summary

This Draft Plan is a full update to the adopted and approved 2015 Emmitsburg Comprehensive Plan (approved in November of 2015 and revised in July of 2021 for the municipal growth element only). The Draft Plan includes land use planning guidance through 2030 (p. 6-10), and the municipal growth element is projected through 2040. (p. 9-1)

Maryland State Visions and New Sustainable Growth Principles

As of the writing of this report, the Land Use Article Section 3-201 requires Maryland jurisdictions with planning & zoning authority to implement the state's twelve planning visions (Visions) through the comprehensive plan. The Visions included in Section 1-201 of the LUA 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 Draft Plan has incorporated these Visions.

During the 2025 session, the Maryland General Assembly adopted [SB 266](#), which replaces the Visions with the 8 Sustainable Growth Planning Principles (Principles) but maintains the requirement for the Principles to be implemented in comprehensive plans. This change is effective October 1, 2025. In partnership with other state agencies and local governments, MDP is developing guidance to help jurisdictions craft and implement comprehensive plans adopted after October 1 that address the new Principles. During the spring and summer of 2025, MDP is conducting a series of regional roundtables to solicit local recommendations and requests related to Principles implementation. MDP will use roundtable insight to inform guidance development and will work with local jurisdictions to incorporate the new Principles into existing comprehensive plans. The Regional Roundtable for the area including Emmitsburg and other local government planners and leaders will take place on June 17, 2025, from 1 - 4 p.m. at the Middletown Library (31 East Green St., Middletown).

MDP acknowledges that the Town of Emmitsburg planned for and completed the Draft Plan under the direction of current Maryland planning law, focused on implementing the 12 Visions. The applicability of SB 266 to draft comprehensive plans involves legal issues for which you may wish to seek the advice of counsel. MDP, however, does not believe that comprehensive plans drafted under pre-October 1, 2025, legal requirements need to be amended now, prior to adoption, to comply with the Principles. Rather, the department suggests the following approaches to incorporating the new Principles, depending on final plan adoption date.

- If the Draft Plan is adopted **before October 1, 2025**, MDP recommends that jurisdictions address the Visions in the adopted plan as they would have if the General Assembly had not adopted SB 266. Jurisdictions should consider, however, acknowledging the adoption of SB 266 and including a statement that the jurisdiction will work with MDP to implement the Principles as part of plan implementation.
- If the Draft Plan is adopted **after October 1, 2025**, MDP recommends that jurisdictions acknowledge and describe the Principles in the adopted plan and indicate that the jurisdiction will work with MDP to implement the Principles as part of plan implementation. Attached to this review is a model one-page Principles comprehensive plan insert that jurisdictions may use for the purpose of this acknowledgement.

Plan Analysis

The Draft Plan lists the Visions (p. 1-2) and describes the framework for policies and objectives as five major goals that reflect the Visions (p. 1-4). MDP congratulates the town in demonstrating that the Draft Plan fulfills the Visions and encourages it to consider a similar approach for the Principles if the Draft Plan is adopted after October 1, 2025.

Municipality Minimum Planning Requirements

LUA Section 3-102 describes the required and optional elements for non-charter county and municipal comprehensive plans but does not mandate how they are to be addressed. The following checklist identifies the required plan elements and how the Draft Plan addresses them.

Checklist of Maryland Code (Land Use Article) Element Requirements for Non-Charter Counties and Municipalities			
Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	References
(1) A comprehensive plan for a non-charter county or municipality must include:	L.U. § 3-102(a)		
(a) a community facilities element	L.U. § 3-102(a)(1)(i)	L.U. § 3-108 -- Community facilities element.	Chapter 8, Community Facilities (p. 8-1)
(b) an area of critical state concern element	L.U. § 3-102(a)(1)(ii)	L.U. § 3-109 -- Areas of critical State concern element	No discussion
(c) a goals and objectives element	L.U. § 3-102(a)(1)(iii)	L.U. § 3-110 -- Goals and objectives element	Throughout the plan
(d) a housing element	L.U. § 3-102(a)(1)(iv)	L.U. § 3-114 -- Housing element SB-687(2021)	Chapter 3, Housing (p. 3-1)
(d) a land use element	L.U. § 3-102(a)(1)(v)	L.U. § 3-111 -- Land use element	Chapter 6, Land Use (p. 6-1)
(e) a development regulations element	L.U. § 3-102(a)(1)(vi)	L.U. § 3-103 -- Development regulations element	Throughout the plan
(f) a sensitive areas element	L.U. § 3-102(a)(1)(vii)	L.U. § 3-104 -- Sensitive areas element	Chapter 5, Environment & Natural Features (p. 5-1)
(g) a transportation element	L.U. § 3-102(a)(1)(viii)	L.U. § 3-105 -- Transportation element	Chapter 7 Transportation & Mobility (p. 7-1)
(h) a water resources element	L.U. § 3-102(a)(1)(ix)	L.U. § 3-106 -- Water resources element	Water Resources (p. 5-3)
(i) a mineral resources element, IF current geological information is available	L.U. § 3-102(a)(2)	L.U. § 3-107 -- Mineral resources element	Not mentioned in the plan
(j) for municipalities only, a municipal growth element	L.U. § 3-102(a)(3)	L.U. § 3-112 -- Municipal growth element	Chapter 9, Municipal Growth Element (p. 9-1)
(k) for counties only if located on tidal waters, a fisheries element	L.U. § 3-102(a)(4)	L.U. § 3-113 -- Fisheries element	N/A
Optional: (2) A comprehensive plan for a non-charter county or municipality MAY include: (a) a community renewal element; (b) a conservation element; (c) a flood control element; (d) a natural resources element; (e) a pollution control element; (f) information concerning the general location and extent of public utilities; and (f) a priority preservation area (PPA) element	L.U. § 3-102(b)	L.U. § 3-102(b)(2)(i)	

Checklist of Maryland Code (Land Use Article) Element Requirements for Non-Charter Counties and Municipalities			
Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	References
(3) Visions -- A local jurisdiction SHALL through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	L.U. § 3-201(c)	L.U. § 1-201 -- The 12 Planning Visions	Completed discussion (p. 1-2 to 1-4)
Optional: (4) Growth Tiers -- If the local jurisdiction has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the jurisdiction's comprehensive plan	L.U. § 1-509		No growth tier map

Conformance with Section 3-102 of the Land Use Article

The following analyzes whether the Draft Plan meets the requirements of the municipal comprehensive plan elements, in accordance with the LUA.

1. 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.

Plan Analysis

Chapter 8, Community Facilities provides for an extensive study of the community facilities within the town including schools, recreation, library, fire and rescue facilities, police, healthcare, water and sewer and other public assistance. The associated goals and strategies are reasonable and helpful to the community.

2. Areas of Critical Concern Element - Synopsis

The areas of critical state concern element is required to include planning commission recommendations to determine, identify, and designate areas that are of critical state concern.

Plan Analysis

The Draft Plan should include an analysis of the areas of critical concern as stated above and encourages Emmitsburg to review the list of designated areas, plans, studies, and programs in the State Development Plan, [A Better Maryland](#).

3. Development Regulations Element – Synopsis

This element should 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.

Plan Analysis

- The Draft Plan explains that the town is planning in the short term to revise the zoning ordinance to be more inclusive and to diversify housing, as well as to allow accessory dwelling units. This includes rezoning of two properties concurrent with the comprehensive plan adoption process. In the long term the town is planning to update the zoning ordinance to encourage more compact development and native plant requirements.
- MDP recommends incorporating zoning flexibility to allow mixed-use (residential, commercial, institutional, and research/ development uses) in locations where redevelopment or revitalization is desired. Flexibility in design and density acts as an incentive to gain investment interest and may influence economic competitiveness.
- Does the Draft Plan provide flexible zoning to incentivize adaptive reuse of historic buildings, infill, and redevelopment near and around the town's historic downtown to further placemaking and draw tourists to this destination?
- Does the Draft Plan promote innovative and cost saving site design that protects the environment and promotes resiliency and sustainability? This could be achieved through greater density in exchange for preservation of natural features, affordable housing, transfer of density, etc.
- Do the town's regulatory tools allow for and incentivize the development of childcare facilities to meet the needs of the community and to combat child poverty in the town? Note that Frederick County is establishing a tax credit for [Day Care Providers](#) and the town might want to review its zoning code to see if this use could be incorporated into more zones and if streamlining the process can incentivize this use.

4. 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.

Plan Analysis

While Emmitsburg describes its vision for housing in the Draft Plan's second section as "residential developments with affordable housing choices," the town addresses the housing element and its requirements in the Draft Plan's third Chapter, Population & Housing. This chapter describes the demographic and economic characteristics of the town's population. It also describes the housing stock's conditions and occupancy characteristics. This review of the Draft Plan's housing element is divided into two sections: (1) the first section evaluates whether the housing element seems to comply with Land Use § 3-114(c) regarding affordable housing and (2) the second section evaluates whether the Draft Plan seems to comply with Land Use § 3-114(d) regarding affirmatively furthering fair housing. Both sections also include recommendations for improving the Draft Plan's compliance with Land Use § 3-114. [MDP's website also includes general information and guidance on housing elements.](#)

Section 1: Maryland Code Requirements regarding Affordable Housing

Maryland Code requires that comprehensive plan housing elements 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 120% of the area median income (Housing and Community Development § 4-1801).

Affordable Housing Analysis

The housing element addresses and analyzes the town's housing affordability on pages 3-14–3-15. The Draft Plan defines workforce housing in accordance with Land Use § 4-1801 but does not include a definition of low-income housing. MDP recommends that the housing element include in its text the definition of low-income housing from Land Use § 3-114 identified above. Within the context of housing affordability, the Draft Plan identifies meaningful data such as area median income and median rent. The housing element also describes components of the town's housing conditions and housing demand, which have a significant relationship with housing affordability, such as projected population growth, age trends, total units, total households, tenure, type, and vacancy. MDP recommends including additional data that reflect the current state of housing demand and affordability in Emmitsburg, such as: age of housing, approved units by year, housing problems, household family status, households by size over time, median rent over time, median home value over time, median household income over time, and cost burdens. Of these, MDP considers cost burdens to be the most significant.

Cost burdens are essential to understanding housing affordability. While the Draft Plan correctly defines the affordability threshold as no more than 30% of a household's gross income, it does not identify the number or percentage of cost-burdened households in the town. This information is publicly available in Census Tables S2503 and DP04, which show up to date 5-year American Community Survey (ACS) estimates of monthly housing costs as a percentage of household income in the past twelve months, for both homeowner-occupied and renter-occupied housing units, disaggregated at various income levels. By analyzing these tables, the housing element can communicate overall housing affordability in Emmitsburg, affordability by income, and affordability by tenure. The Draft Plan can provide an even more robust historical analysis of housing affordability by showing median rent, median home value, and median income over time, which are all also publicly available data from the Census Bureau.

MDP recommends including information on housing production in Emmitsburg. Exact data on the number of units permitted by year is typically available from your jurisdiction's local permitting office. The Draft Plan can supplement its analysis of vacancy by comparing historical housing production (that is, number of units constructed or permitted per year) against median rents and overall affordability for differing income levels to better understand whether the town's housing supply has kept up with demand.

MDP recommends that the housing element include additional information regarding household characteristics. Census Table P16 includes information on household family status: married, married with children, living alone, etc. Emmitsburg can use this data to supplement data on average household size in Census Table S1101 and the age distribution already present in the Draft Plan. By tracking changes in household characteristics and size over time, the housing element could communicate a clearer understanding of the community's changing preferences for housing as households of different sizes, ages, and family statuses have distinctive housing needs.

MDP recommends that the Draft Plan include some information on the physical characteristics of the town's housing stock. The age of the town's housing units is publicly available in Census Table S2504, which shows the age of housing by decade and other potentially relevant physical characteristics. This information can be supplemented by [Comprehensive Housing Affordability Strategy \(CHAS\)](#) data from HUD that show the number of households with housing problems such as incomplete kitchen facilities, incomplete plumbing facilities, and overcrowding.

Together, these data can help the Draft Plan communicate whether the town's housing stock adequately meets current and future residents' needs. For instance, considering the town's projected population growth and current household size, how many new housing units will it need to maintain the same household size? Considering the trend in household size over time, would the projected population growth require more or less housing units than the projection would imply? The town can supplement this

analysis with its information on current and historical housing production to help inform its goals, strategies, and actions with respect to residential zoning.

With this understanding of its current housing conditions and needs, Emmitsburg will be ready to consider and potentially pursue the actions described in the Housing Toolbox of Maryland's [Housing Needs Assessment & 10-year Strategic Plan](#) to enhance local housing affordability or pursue other important goals.

Section 2: Maryland Code Requirements regarding Fair Housing

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 combatting 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 housing element is required to include an assessment of fair housing (Land Use § 3-114).

Fair Housing Analysis

The Draft Plan does not seem to include an assessment of fair housing. Land Use § 3-114 does not define what an assessment of fair housing entails, but MDP recommends referring to [this webpage](#), which describes available fair housing best practices and how jurisdictions might consider using them in their housing elements. It includes a section on data and mapping resources that may help the city with a quantitative assessment. It also includes self-assessment and community engagement questions that the city might use (or expand upon) to conduct a qualitative assessment of fair housing.

MDP's research into affirmatively furthering fair housing has shown that a traditional US HUD assessment of fair housing includes an analysis of the following four housing issues in a community.

1. **Patterns of segregation/integration:** Areas within the jurisdiction that are residentially segregated by protected class
2. **Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS):** US HUD defines r/ecaps in metropolitan areas as census tracts with a non-white population of 50 percent or more and a poverty rate of 40 percent or more (or a poverty rate that is three or more times the average tract poverty rate for the metropolitan area, whichever threshold is lower). For rural areas, HUD lowers the non-white percentage threshold to 20 percent.
3. **Disparities in access to opportunity:** Areas within the community/jurisdiction that provide access to opportunity, such as good schools, medical facilities, employment centers, positive public health outcomes, and low crime rates. A fair housing assessment would consider if protected classes have less access to such areas.
4. **Disproportionate housing needs:** An analysis considering whether certain areas or populations within a community, particularly protected classes, have disproportionate housing needs than other areas or populations.

Land Use § 3-114 does not state that these four issues must be included in an assessment of fair housing in a housing element, nor is MDP setting any standards for what must be included. MDP encourages the city to discuss the legal requirements of the assessment with its attorney. MDP staff are also available to meet with the city and discuss fair housing needs and objectives in more detail.

5. 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.

Plan Analysis

Chapter 5, Environmental & Natural Resources includes the goal of protecting existing environmental resources in the town and encourages compatibility with the man-made environment. MDP commends the town for recognizing the importance of sustainability and discussing the three pillars. MDP recommends the town consider the pedestrian and parking areas and constructing new storm water management devices to address pavement run-off prior to the water entering the stream systems in the area. MDP recommends the town consult the [Prince George's County Landscape Manual](#) (effective 2022) for examples of a regulatory aspects for development/redevelopment of residential and commercial land uses that will address heat islands, biodiversity, and other resiliency and sustainability issues.

6. 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 travel ways, and estimate the use of proposed improvements.

Plan Analysis

Chapter 7, Transportation & Mobility appears to meet the purpose and requirements of this element. The following comments are provided for additional consideration to further the transportation element of the Draft Plan.

- MDP notes that the draft plan includes goals, objectives, and strategies to address the town's most significant transportation needs, including truck and through traffic impacts on Main Street (MD 140), a lack of parking along Main Street to support businesses and activities in the downtown area, and gaps in pedestrian infrastructure and transit connections.
- Regarding Strategy 1 (page 7-6), in addition to studying alternative route(s) to divert through and truck traffic from Main Street, the town should assess and lay out potential local roadway connections to form a more interconnected roadway network (including pedestrian and bikeway accommodation) and reduce the prevalence of cul-de-sacs for current and potential development in the town and planned growth areas (Figure 6.4, page 6-14). A more connected roadway network can help reduce traffic congestion on Main Street through the town and other major collectors. This website provides good resources and tools on improving street network connectivity: <https://www.transportationefficient.org/improve-street-network-connectivity/>
- The town designates substantial commercial, institutional, and industrial land uses along the US 15 corridor (Figure 6.4, page 6-14). To support the planned growth and maintain traffic safety and operation along US 15, MDP staff suggests the draft plan include a strategy to work with the Maryland State Highway Administration to conduct a transportation and land use corridor study to address access management/control and land development along the US 15 corridor to help guide the planned future growth. A corridor planning approach can avoid or minimize the negative impacts of piecemeal development on the traffic safety and operation on a major highway.
- To help implement the transportation strategies (pages 7-6 to 7-7), the town should coordinate with Frederick County to explore the potential of seeking funding and/or technical assistance from the Metropolitan Washington Council of Governments (COG) for planning studies. For instance, the town may be able to utilize the COG's support for a pedestrian and bicycle connection study to implement Strategies 2 and 3 and a parking study for implementing Strategies 5, 6, and 7.

- The town should also 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.
- The town can also utilize state resources to enhance pedestrian and bicycle connectivity further. The Maryland Department of Transportation (MDOT) implements Complete Streets statewide for state highways. Please check this link for MDOT’s Complete Streets Initiative: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=207>. MDOT provides various funding and technical assistance 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: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=24>
- MDOT is developing a new Maryland State Transportation Trails Strategic Plan designed to improve and expand trail connectivity in Maryland. See the link for the details of the plan development: <https://www.mdot.maryland.gov/tso/pages/index.aspx?PageId=215>. The town may want to provide input into this state trail plan to address its desire to improve trail connections, as addressed in Strategy 3 (page 9-18, 9- Municipal Growth).
- Beginning October 1, 2023, a county or municipality in Maryland may require that the new construction of single-family homes with a garage, carport, or driveway include a Level-2 EV charger or electric pre-wiring to support a Level 2 EV charger (Reference: [Maryland Statutes, Public Safety Code 12-205](#)). MDP staff suggests the town consider this EV charging or charging-ready requirement for new single-family residential housing units.

7. Water Resources Element – Synopsis

The water resources element (WRE) is required to consider available data provided by 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 expand the water resources element, ensuring consistency with MDE programs and goals.

Plan Analysis

The Draft Plan does not include a standalone WRE, but there is a Water & Sewer Infrastructure section in the Community Facilities chapter, and WRE considerations are also discussed in the Environment & Natural Resources, Municipal Growth Element, and Implementation chapters. MDP recommends that the town include a short chapter to recognize the requirement of the WRE in the LUA and indicate the areas of the Draft Plan that addresses it. For example:

- The Environment & Natural Resources chapter discusses several protective water resources considerations, e.g. a holistic approach towards stormwater management, fostering community engagement in the preservation of local water resources, and integrating climate adaptation and resilience planning into the plan’s long-term strategies.
- The Community Facilities chapter’s Water & Sewer Infrastructure section describes the water and wastewater systems that the town owns/operates and the permitted capacities for the systems. MDP recommends the town compare current capacity to current or future demand.
- Water and Sewer Analysis:
 - The Municipal Growth Element (MGE) projects population growth from 2,770 residents in 2020 to approximately 3,237 in 2040, and states that additional water and wastewater resources will be required to meet demand. MGE Table 9.2 shows the buildable lots and number of dwelling units per lot for the incorporated municipality, the annexation pipeline, and other buildable lots within the Growth Boundary, resulting in 888 potential dwelling units; and Table 9.3 shows 474 units in the Residential Units Development Pipeline. The MGE acknowledges two non-residential projects—a brewery and a church—which, the chapter states, will also add to demand for water and wastewater resources.

- The MGE includes an Impacts on Community Facilities section, which includes a Water & Sewer Capacity section, including Table 9.4 Availability of Water & Sewer Taps in 2024 compared to Projected Residential Development, which shows that—after accounting for the Future Development Pipeline—there would be a deficit of 686-955 water taps and a surplus of 333-602 sewer taps. The section also notes that utilization of specific water supply resources (i.e. Reservoir 1, Reservoir 2, Well J, and Well 7) could provide additional water taps, but only if Emmet Gardens Water Treatment Plant is constructed (a \$2 million+ investment); and notes that developers will need to be required to contribute to expanding water supply for their projects.
- The Table 9.4 water and sewer tap analysis compared to the future development pipeline is very helpful; however, has the town considered analyzing (and displaying the analysis tabularly in the plan) the potential/planned water supply capacity that utilization of Reservoir 1, Reservoir 2, Well J, and Well 7 and the future Emmet Gardens Water Treatment Plant would achieve, and how that potential capacity increase compares to the water taps deficit shown in Table 9.4?
- Since the MGE indicates potential 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, e.g. the brewery and church) 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.
- Chapter 10, Implementation includes several action steps for water and sewer, including: conducting a needs assessment; addressing aging infrastructure; constructing the Emmet Gardens Water Treatment Plant; establishing a formal annexation review process that considers fiscal impact, infrastructure capacity, and compatibility; maintaining/updating tap availability tracking for both water and sewer systems; requiring applicants for large-scale development to demonstrate infrastructure readiness or planned upgrades; using annexation agreements to ensure new development contributes to infrastructure costs; and monitoring/guiding development so that it aligns with available water/sewer infrastructure.
- MDP commends the town on considering climate change mitigation and developing action steps to ensure adequate water and sewer supply.
- In addition, Frederick County adopted a new WRE (Water Resources in Frederick County: A Water Resources Element of the Livable Frederick Comprehensive Plan) in January 2025. The town's plan does not acknowledge the county WRE. Has the town considered acknowledging the county WRE and including text in the town plan regarding whether the county WRE analyses and recommendations reflect the projected impacts and needs that would result from implementing the town's land use plan?

8. 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.

Plan Analysis

The major goals of the Draft plan at the end of each chapter provide the framework for existing and future policies and objectives. Nine sections of the Draft Plan also include goals and objectives based on the chapter topics. MDP recommends that all policies and recommendations meet the needs of the community in an equitable and inclusive manner and be data driven, with qualifiable metrics to assist in annual reporting as required by the LUA Section 1-207(c)(6), which requires jurisdictions to submit a comprehensive plan implementation report five years after plan adoption.

9. 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.

Plan Analysis

Chapter 6, Land Use explains the town's zoning ordinance and the growth boundary. An important aspect of zoning in a small town with historic character such as Emmitsburg is the promotion of flexible use types so that the reuse of buildings and infill development are not a difficult process for investors. This seems to be achieved in the Village Zone along the main street. Mixed-use zoning and land use provides flexibility into the land use map so that responding to future real estate investment proposals, including rezonings and floating zones, particularly where development and redevelopment is desired to revitalize the community.

10. Municipal Growth Element - Synopsis

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.

Plan Analysis

The town's analysis in the MGE (Chapter 9) is informative. It supplements the linear population projection with an analysis of population capacity based on allowable housing units and appears to examine the town's water and sewer capacity as a limiting factor. Municipal growth indicates and "analyzes land use demands and anticipated effects on public facilities due to the projected population growth from 2,770 residents in 2020 to approximately 3,237 in 2040." The most limiting factors for residential growth are adequate water, sewer, and school capacity. MDP's Geospatial Data Analysis unit suggests that if the Draft Plan is approved with either an expanded or reduced MGE, please provide MDP updated GIS layers of the growth areas, as well as the future adopted land use map.

11. Mineral Resources Element - Synopsis

If current geological information is available, a comprehensive plan is required to include a mineral resources element. It should identify land that remains undeveloped to provide a continuous supply of minerals, which are defined in the Environment Article. They include clay, diatomaceous earth, gravel, marl, metallic ores, sand, shell, soil, and stone. The element is required to further identify post excavation land uses and incorporate strategies that balance resource extraction with other land uses and prevent, as much as possible, preempting mineral extraction in the jurisdiction.

Plan Analysis

The Draft Plan does not address this element.

12. Growth Tier Map - Emmitsburg has not adopted a Growth Tier Map.

13. Plan Implementation

Chapter 10: Implementation states “The purpose of Envision Emmitsburg is to create a blueprint for sustainable economic growth, community development, and environmental stewardship.” (p. 10) This chapter consolidates all the time frames and actionable steps for Draft Plan implementation.

The Town of Emmitsburg is a Sustainable Community - It should be noted that the Town of Emmitsburg has a Sustainable Community Action Plan and has a designated [Sustainable Communities Area](#) (see [this statewide Neighborhood Revitalization Mapper](#)). As part of the Sustainable Community designation, quality of life, environment, economy, transportation, housing and local planning and land use are all subjects of the Action Plan. The town should compare the documents to align actions and strategies.

Conclusion

MDP commends that town for including the three pillars of Sustainability, as this reflects sustainable growth and the new 8 Sustainable Growth Principles that were passed during the 2025 Legislative Session. In addition, since the town has historic significance, and with the concept of placemaking entering the community planning realm, [this blog](#) from Keystone Ridge might be interesting for the town if it considers investing in streetscape to enhance urban design and place. MDP hopes the town finds the information contained in this letter helpful and offers to provide further assistance as the town prepares for the review and adoption of the Draft Plan.

**Maryland Department of Planning Review Comments
Town of Emmitsburg Draft Comprehensive 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 Emmitsburg as soon as possible.

Attachments

Page #15: Maryland Department of Natural Resources

Page #21: Maryland Department of the Environment

Page #24: Maryland Department of Housing and Community Development



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 comments on the Town of Emmitsburg *Envision Emmitsburg* comprehensive plan

To: Susan Llareus
cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on the Draft Town of Emmitsburg 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 Freshwater Fisheries Division reviewed the plan and supports the Town of Emmitsburg's plan to protect water resources in the municipality. The plan incorporates vegetative buffers next to streams/creeks and minimizing impervious surface cover to maximize groundwater infiltration. Freshwater Fisheries would also encourage continued protection of the Emmitsburg watershed and Rainbow Lake.

The Wildlife and Heritage Service commends the *Envision Emmitsburg* comprehensive plan for generally including language within the sections on Surface Waters & Stream Buffers and Environmental Corridors to discuss the concepts of ecological habitat for plant and animal movement and the need to conserve green space and the Town's natural landscape. However, the plan lacked information about the presence of habitat for state designated rare, threatened, and endangered species. Among the strategies to accomplish the stated goal of preserving the natural resources of Emmitsburg, we recommend the establishment of a formal habitat protection area along the streams, as well as the development and implementation of additional programs to help conserve the remaining natural lands in this area and restore degraded stream buffers. The Wildlife and Heritage Service supports all programs designed to improve water quality and encourages strengthening these efforts for the conservation of rare aquatic species.

Attached to this letter is a document that describes the ecological significance of the streams flowing through Emmitsburg and beyond. Rare aquatic species (fish and freshwater mussels) have been documented within the town limits (namely *Strophitus undulatus*, commonly known as Creeper), as well as both upstream and downstream in the Toms Creek drainage system and in the Monocacy River. These rare species populations are influenced and impacted by the land use practices within Emmitsburg, such as increases in impervious surfaces and the sewage overflow event mentioned on page 5-9. The document includes a description of the Lower Toms Creek Ecologically Significant Area which also mentions management concerns and potential strategies to address the concerns. The second attachment is a map showing the boundary of the area as it relates to Emmitsburg. This boundary forms the basis for

our Sensitive Species Project Review Areas layer in the Merlin Online interactive webmap, which is used during the environmental review process.

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

Lower Toms Creek
County: Frederick & Carroll

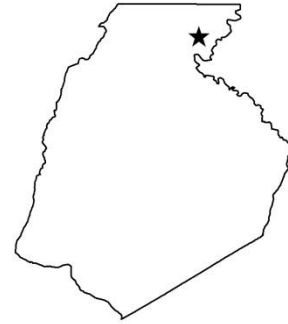
BioNet Tier: 2
Size: 2,859 ac

Key Wildlife Habitats

- Piedmont Stream

Important Features

- Brook Floater (*Alasmidonta varicosa*, state-listed as Endangered) and other rare freshwater mussels
- Pearl Dace (*Margariscus margarita*, state-listed as Threatened)
- Comely Shiner (*Notropis amoenus*, watchlist)
- Rich woods with rare plants



Ecological Significance

The headwaters of the Toms Creek watershed begin more than 10 miles north and west in Pennsylvania and flow southward past farmland and forests into Maryland. The Lower Toms Creek area includes an extensive stretch of buffered streams from Emmitsburg and the Pennsylvania border to the confluence with the Monocacy River, as well as several kilometers along the Monocacy. The habitats vary along the length of the creek, but much of the area can be described as a flowing, dark gravel-bottomed stream with short sections of riffles and scattered, slow, waist-deep pools with silted bottoms. The creek is generally bordered by agricultural fields and narrow woodlands.

This area is significant because it has been documented as supporting populations of several rare freshwater mussel species, including the Brook Floater (*Alasmidonta varicosa*, state-listed as Endangered), Atlantic Spike (*Elliptio producta*, state-listed as In Need of Conservation), Creeper (*Strophitus undulatus*, state-listed as In Need of Conservation), and Alewife Floater (*Anodonta implicata*, watchlist). Freshwater mussels require fish hosts for part of their life cycle and are filter-feeders; therefore, water quality is of crucial importance to their continued existence. These species require clean water and are sensitive to disturbances in water quality. Two rare freshwater fish species, the Pearl Dace (*Margariscus margarita*, state-listed as Threatened) and Comely Shiner (*Notropis amoenus*, watchlist) have also been found in Toms Creek.

Along the Monocacy River at the southern end of the area, the stream is surrounded by rich upland woods with oak, maple, ash, sycamore, and viburnum species. A population of Yellowleaf Tinker's-weed (*Triosteum angustifolium*, state-listed as Endangered) can be found in the woods here.

The forested areas surrounding Toms Creek, Flat Run, and other tributaries in the watershed are not only a vital buffer for the rare aquatic species but also an important habitat for terrestrial species. Forest interior dwelling species (FIDS) utilize the larger riparian forest areas that remain as migration stopover habitat and nesting areas. Forest interior dwelling bird species require large tracts of unfragmented forest for optimal breeding. Most FIDS are neotropical migrants, birds that travel long distances to breed in North America and overwinter in Central

and South America. They include some of our most brilliantly colored songbirds such as the Scarlet Tanager and Hooded Warbler, as well as some year-round residents like the Barred Owl and Pileated Woodpecker. Riparian forests at least 50 acres in size with an average total width of at least 300 feet are considered FIDS habitat. Other characteristics of riparian FIDS habitat is that the stream within the riparian forest should flow all year, and most of the forest should be dominated by pole-sized or larger trees with a closed canopy.

Populations of many species of forest interior breeding birds are declining in the mid-Atlantic region and beyond. These declines have been attributed largely to the loss and fragmentation of forests in the eastern United States due to urbanization, agriculture, and other causes of forest loss. Tropical deforestation on the wintering grounds also is an important factor. The key to maintaining suitable breeding habitat for FIDS is the protection of extensive, unbroken forested areas throughout the region.

The riparian forest along streams in the Toms Creek watershed also provides movement corridors for a variety of wildlife and connectivity between forested tracts. Such movement corridors may prove to be essential for the resilience of wildlife populations as they shift their ranges northward and upslope to adjust to the changing environmental conditions.

Site Management Considerations

Since much of the watershed falls within active agriculture land, nearby agricultural activity can impact the Lower Toms Creek area. Runoff of pollution, excess nutrients, and sediment from the adjacent farm fields may affect water quality. Excess nutrients can also infiltrate the local groundwater feeding the streams. Changes in rainfall or increased groundwater extraction for additional development or irrigation could alter the flow levels of the aquifer. Logging the uplands and floodplain forest could produce siltation and water quality degradation if not properly conducted. Discarded trash along the stream would also pose problems for the wildlife in the watershed.

The rare freshwater mussels that live in the Lower Toms Creek drainage face unique threats. Mussels may become stranded in isolated pools in years of severe drought, and this may become a more common issue if drought is persistent or if groundwater is appropriated at a higher rate for irrigation in the area. Predation on mussels may increase during periods of severe drought, as predation has been documented and attributed to opportunistic mammals such as raccoons.

As residential development increases within the Toms Creek watershed, increases in impervious surfaces in the area will adversely impact the stream system, including susceptibility to erosion from heavy rainfall events. To mitigate these effects, planners and developers should focus on maintaining the current hydrological conditions of the stream system, reducing impervious surfaces in the area, increasing forest cover, increasing the width of riparian forests and other natural cover along the streams, and reducing the likelihood of sedimentation.

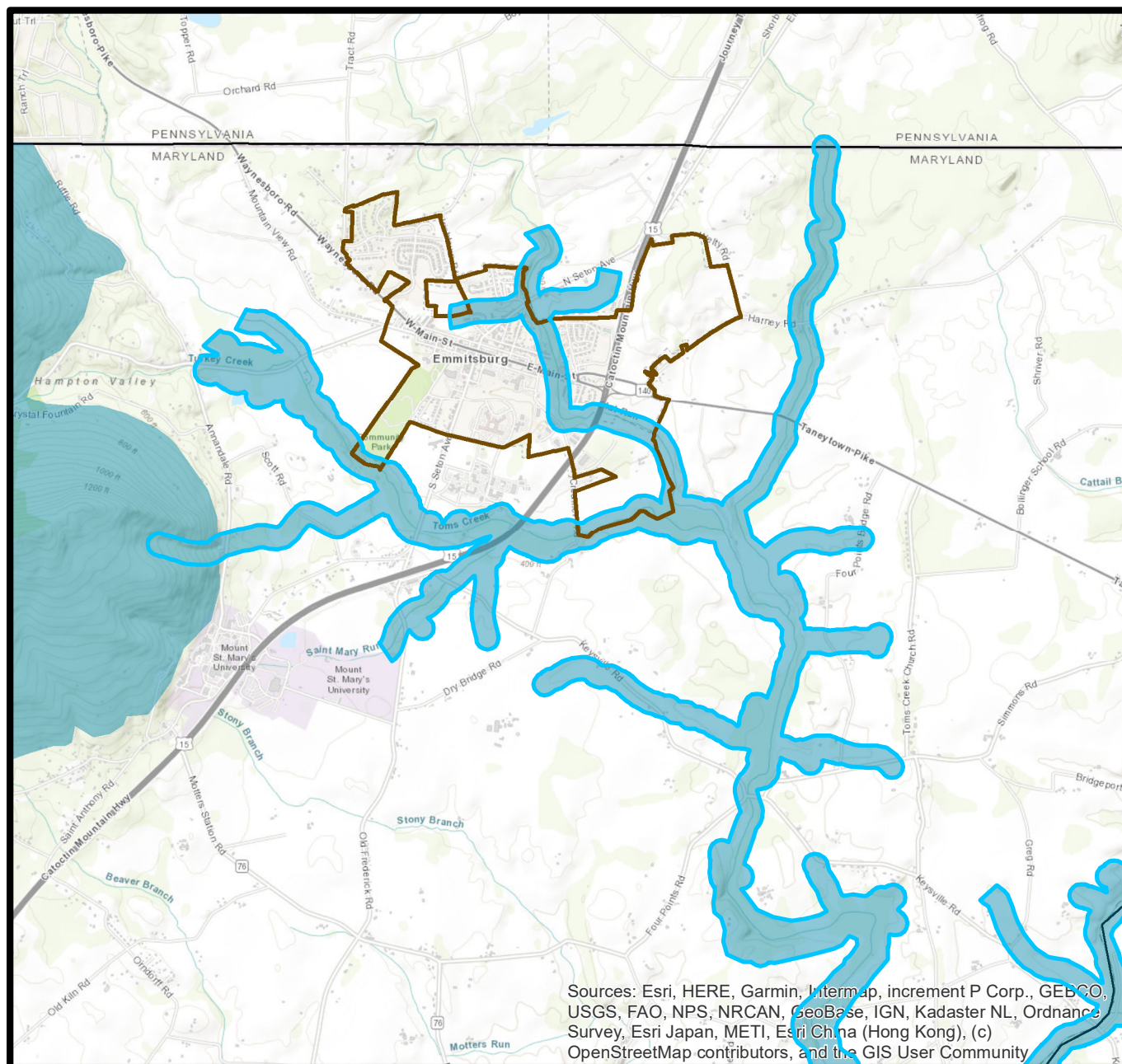
As the forest in the Lower Toms Creek area ages, it provides better habitat for a variety of FIDS and other bird species, as well as reptiles, amphibians, small mammals, numerous insects, and other species. Many wildlife species utilize tree cavities and forage for insects or fungi on the

snags and dead branches of standing trees and in the leaf litter and accumulated woody debris found in an old forest. The well-stratified canopy of the older forest provides excellent habitat for a variety of wildlife, including FIDS, and maintaining large blocks of contiguous forest is key to maintaining habitat for FIDS. In order to conserve high quality FIDS habitat, limit development activity to non-forested areas that are not sensitive habitats, and where this is not possible, to forest edges. Avoid disturbance during the breeding season, April through July for most FIDS. Controlling invasive species, particularly invasive vines and ground cover, is important to sustaining habitat for FIDS. Control of deer populations is also important to maintaining the complex forest structure vital for high quality habitat for FIDS and other wildlife.

More specific guidance for reducing the detrimental impacts to FIDS habitat from development activity and timber harvest is available from Natural Heritage Program staff and the following sources: A Guide to the Conservation of Forest Interior Dwelling Birds in the Chesapeake Bay Critical Area (https://dnr.maryland.gov/education/Documents/tweetyjune_2000.pdf) and the Maryland DNR FIDS/Forestry Task Force Chesapeake Bay Critical Area Timber Harvest Plan Guidelines (https://dnr.maryland.gov/forests/Documents/chesapeake/CF-SFMP_2018.pdf). While these guidelines regarding development and timber harvest were developed for the Critical Area, they are relevant to FIDS conservation statewide.



The Maryland Department of Natural Resources' Natural Heritage Program and cooperative partners completed a State Wildlife Action Plan in 2015 as a requirement of State Wildlife Grant funding. The plan details key wildlife habitats, natural communities, and Species of Greatest Conservation Need (SGCN) statewide and provides information on threats and conservation needs of Maryland's wildlife resources and supporting habitats. For more information, the full Plan can be accessed at http://dnr.maryland.gov/wildlife/Pages/plants_wildlife/SWAP_Submission.aspx.

Lower Toms Creek Ecologically Significant Area Emmitsburg, Frederick County, Maryland



0 0.4 0.8 1.6 Miles



-  Town of Emmitsburg
-  Lower Toms Creek ESA

Wes Moore
Governor

Aruna Miiller
Lt. Governor

Josh Kurtz
Secretary

David Goshorn
Deputy Secretary



Wildlife & Heritage Service
580 Taylor Ave, E-1
Annapolis, MD 21401

April 30, 2025



Draft 2025 Comprehensive Plan Envision Emmitsburg

Maryland Department of the Environment – WSA/WPRPP

REVIEW FINDING: R2 Contingent Upon Certain Actions
(MD20250407-0262)

Water & Sewer:

Municipal Water System

On page 8-15, the Draft Envision Emmitsburg Plan (Plan) indicates there is one impoundment in use, Rainbow Lake, on Turkey Creek. The 2024 Frederick County Water and Sewerage Plan (W&S Plan), Table 3-2: Municipal Owned Community Water Systems, indicates there are two impoundments. Also on page 8-16, the Plan says there are several impoundments not in use. It's not clear if these are the same ones indicated in the Frederick W&S Plan.

The Town should confirm with the County and update Plans as needed.

Flooding:

Please be advised, the property or properties in MD20250407-0262 is/are 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.



April 17, 2025

Ms. Susan Llareus
Planning Supervisor
Maryland Department of Planning
120 E. Baltimore Street
Suite 2000
Baltimore, MD 21202

Dear Ms. Llareus:

Thank you for the opportunity to review and comment on the Draft 2025 Comprehensive Plan Envision Emmitsburg (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.
2. The Plan identifies a need to revitalize the community through adaptive reuse of vacant buildings 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 Ms. Sara Jackson, Regional Project Manager, 410-209-5812, email, 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 Ms. Sara Jackson, Regional Project Manager, 410-209-5812, email, sara.jackson@maryland.gov

4. The Plan identifies a need to address blighted properties for which DHCD's Strategic Demolition Fund (SDF) grants could assist with demolition or stabilization of properties. Planning staff can learn more about SDF online at <https://dhcd.maryland.gov/Communities/Pages/programs/SDF.aspx> or by contacting Ms. Sara Jackson, Regional Project Manager, 410-209-5812, email, sara.jackson@maryland.gov.
5. The Plan does not show that Emmitsburg has conducted a point-in-time count to identify the total number of people experiencing homelessness in Emmitsburg, 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 the Frederick Community Action Agency at 301-600-1506.
6. The Plan identifies the community's needs with respect to income and poverty. The Town of Emmitsburg, or non-profits active in Emmitsburg, 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 affordable housing as a challenge. Planning staff and residents may learn more about Maryland's homeownership programs at <https://mmp.maryland.gov/pages/default.aspx>. Information about rental housing programs is available at <https://dhcd.maryland.gov/Residents/Pages/Renting/default.aspx>.
8. Emmisburg's downtown has been designated as a Maryland Main Street affiliate. More information on the revitalization benefits associated with this designation can be found online at <https://dhcd.maryland.gov/communities/pages/programs/mainstreet.aspx>.
9. The Plan identifies a need for businesses development 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.
10. 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. While the program is currently closed, the Town can sign up for alerts and get more information



April 17, 2025

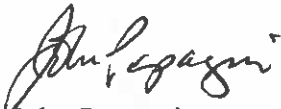
Page 3

online at <https://dhcd.maryland.gov/Pages/ProjectRestore/default.aspx> or by contacting Kristin Dawson at 410-209-5847 or kristin.dawson@maryland.gov.

11. 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 Emmitsburg 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
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

