



Maryland Department of Planning

Sustainable \_\_\_\_\_ Attainable

November 9, 2012

Mr. Richard Lee Outen, Jr., President  
Fruitland City Council  
City of Fruitland  
401 East Main Street  
P.O. Box F  
Fruitland, Maryland 21826

Dear Mr. Outen, Jr.,

RE: MDP's review of adopted tier map; No comments

Thank you for providing the Department of Planning with a copy of Resolution #5-2012 adopted by the City of Fruitland on October 9, 2012. This resolution establishes growth tiers under the Maryland Sustainable Growth and Agricultural Act of 2012 for the City of Fruitland and references the official map displaying the Growth Tier areas.

The Act allows the Department to comment on mapped growth tiers when the Department determines that the growth tiers do not meet the criteria established by the Act.

The Maryland Department of Planning is pleased to advise you that the map adopted by the City of Fruitland satisfies the criteria for designation of growth tiers under the Maryland Sustainable Growth and Agricultural Act of 2012. The Department therefore has no comments on the adopted map.

Please be advised that the growth tiers shall be incorporated into the City's comprehensive plan or an element of the plan when the City conducts its six year review of the plan. If the growth tiers are not incorporated into the comprehensive plan or an element of the plan during that 6-year review, Senate Bill 236 provides that the growth tiers may not be considered as adopted and the restrictions on major subdivisions outside sewer areas shall apply.

Wicomico County may be submitting growth tier maps to the Department. To date, we have not received a tier map from the County. Should there be any conflicts between the City's mapping and that of the County, the Act provides a process for resolution.

Although MDP has no comments on the Town's adopted tier map, we would like to reiterate our previous stance on the Town's Municipal Growth Element (MDP's October 30, 2008 comment letter on the Town's draft Comprehensive Plan). The Department expressed concern that the amount of land in the Town's designated growth areas is too large compared to MDP's population projections for the Town. Focus on infill and redevelopment, infrastructure maintenance and upgrade, neighborhood and downtown revitalization, and historic preservation, will ensure that the Town can accommodate future population growth within its current municipal boundaries.

We would like to recognize the City for being among the first jurisdictions in the State to have adopted a Growth Tier map as called for under the Maryland Sustainable Growth and Agricultural Act of 2012 .

Should you have any questions, please don't hesitate to contact us.

Sincerely,



Rich Josephson  
Director of Planning Services

Cc: Jack Lenox, Planning Director, Wicomico County  
Tracey Gordy, Director, MDP LES Regional Office  
Jay Sakai, Director, Water Management Administration, MDE  
Jason Dubow, Director, Environmental Planning Division, MDP

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

**THE VISIONS**

Maryland's Planning Act of 1992 and subsequent legislation in 2000 requires that the eight Visions be included and implemented through the comprehensive plan. Overall, the City has done a fair job of incorporating the Visions into meaningful Plan goals, objectives, policies, and recommendations, however, the following comments may strengthen the document.

**COMMUNITY FACILITIES ELEMENT**

- It seems that the Community Facilities Element is lacking a great deal of detail, and perhaps this is due to certain issues being discussed within the Municipal Growth Element. However, MDP suggests that it is appropriate to address, within the Community Facilities Element, how adequately the existing community is served, and provide recommendations as to how to address any inadequacies that currently exist. As an example, the Parks and Recreation Section of this element does not deal with the apparent lack of recreational facilities and open space in the community. This section should have independent analysis of needs and recommendations for improvement, absent "municipal growth" outside of existing municipal limits. This concept should be applied to the Educational, Libraries, Fire Protection (which currently has no EMS, but is not mentioned in this section) and Public Transportation Sections of this element. These issues should then be developed into, and reflected within, a Policies and Recommendations Section of this element and within the Implementation Element. Furthermore, in the vein of additional detail, many of these categories (such as Police) have "industry standards" (e.g. # of officers needed per 1,000 citizens) that could be applied to analyze the adequacy of current services. The use of such "industry standards" should also be applied in the analysis within the Municipal Growth Element. This Department would suggest that it was not the intent of the Legislature, when adopting HB1141, that the Community Facilities Element analysis of, and recommendations for, the existing community facilities be sacrificed, in lieu of a Municipal Growth Element.
- Page 25, within the Public Transportation Section of this element, there should be discussion of the City's participation in the MPO, and as mentioned above, discussion about, and policies or recommendations for needed improvements to serve the existing users.

- The potable water supply information in the Community Facilities Element should incorporate the information that is found in the latest Draft 2008 Wicomico County Water and Sewer Plan (WSP). The information from the draft WSP discusses current water consumption (0.51 MGD with a peak demand of approximately 0.55 MGD), piping and storage information, water treatment plant treatment capacity, output water quality, operational demands, and short-term projects to improve service. The projected water demands from the anticipated growth can be discussed in the Water Resources Element.
- Page 24, throughout this page (and elsewhere in the Plan) the references to water and sewer capacity vacillates between references of “million GPD” and “MGD”. It is recommended that the reference remain consistent. Also, within the second paragraph of the Sewer System Section, the use of the acronym TMDL is used for the first time without use of the full term, and without any description of what a “TMDL implementation strategy” actually is.
- Page 24, within the third paragraph of the Sewer System Section, it is recommended that the last sentence be re-worded to state “...land will have to be provided for spray irrigation of WWTP effluent and/or a nutrient trading program must be established”. Also, it may be appropriate to briefly discuss what a nutrient trading program does, as it may not be a familiar term for the average reader.
- Page 24, within the fifth paragraph of the Sewer System Section, the second sentence states that “the WWTP is at 79% of its capacity...”; however, on page 48 the Plan states capacity at 65.5%.
- Page 26, Public Offices and Administrative Facilities Section, it is suggested that some detail be provided within this section, such as hours of operation, number of staff, services provided, etc.

#### LAND USE ELEMENT

- Table 5-1 indicates that 26.8% of the City is agriculture/undeveloped (641.48 acres). Table 5-2 shows that 808 lots already exist where development is in the pipeline, but has not yet occurred or the houses are empty. The plan text further states that another 258 lots in the City are unoccupied. Are these 258 lots included in the 808 lot total shown in Table 5-2?
- Given the situation outlined in the bullet above, perhaps the Plan should reconsider the development of some of its agricultural parcels at its boundaries and evaluate the possibility of working with the county to create a greenbelt. The Plan should discuss the location of protected lands in the county in relationship to the location of the City’s farmland, and whether or not preservation could help

achieve City and county planning goals. Some of the farmland is projected to become recreation/conservation land, which is good.

- Page 32, Parks and Recreation Section, the planning for a west side park should include coordinating with the county to address the City's needs in the county's Land Preservation, Parks, and Recreation Plan.
- Page 33, Open Space Section, further detail should be provided to this section. The Plan states "[t]he City should continue to require developers to set aside large tracts of open space for use by the residents of the subdivision and the City as a whole". To what end? Some discussion should be provided about the intended purpose of these "large tracts of open space" (e.g. active/passive, trails network, green infrastructure considerations), as opposed to just pockets of open land.

### **MUNICIPAL GROWTH ELEMENT**

MDP has reviewed the City's Municipal Growth Element in the context of the requirements of HB 1141 and offers the following comments for your consideration.

The City has done a good job of incorporating population projections and a development capacity/build out analysis into the draft Plan. However, MDP does have some concerns regarding the data reported on population/household projections and the development capacity analysis.

#### **Development Capacity Analysis**

- In October of 2007, the MDP worked with the City on completing a development capacity analysis. MDP's report found that there is additional capacity for 4,508 new households in the City. On page 37 of the draft Plan the City indicates that MDP's analysis reported a capacity of 4,958 households. Additionally, table 6-2 identifies capacity by zoning which also does not match the data MDP provided to the City and is referenced to Davis, Bowen and Friedel, Inc. It appears that the capacity of several zones has been modified and that a new category "approved" has been added. The "approved" category represents units that have already been approved for development and totals 554. The City should ensure that they are not double counting parcels/capacity. MDP's analysis most likely already counted these parcels in the capacity analysis since they had development potential. If there was not a structure on the parcel it was counted in MDP's capacity analysis. The table below represents the capacity analysis provided by MDP.

<b>Zoning</b>	<b>Capacity (in Households)</b>	<b>Acres</b>
RIA	222	230.7
RIAA	1	25.4

R1B	128	125.7
R1C	1,809	948.9
R1D	0	5.9
R1E	37	9.4
R2	106	87.0
R3	1,937	209.6
R4	268	83.4
<b>Total</b>	<b>4,508</b>	<b>1,800</b>

- The draft Plan also makes mention that MDP’s draft capacity analysis does not take into consideration “undeveloped or underdeveloped parcels that may not be developed for various reasons...lack of access to the property.” While completing this analysis MDP did meet with the City to refine the analysis and take out parcels due various land/lot constraints.

Population/Household Projections

- On page 37 of the draft Plan the City discusses several methodologies for rendering projections. The draft Plan also mentions that MDP provided population projections to the City; however, the household projections in the Plan do not match what MDP provided. While the population projections do match for the three methods provided, the household figures do not reflect those provided by MDP. It appears that the population projections were divided by some average household size to report the household figures. This would not account for any future changes in household size, which MDP’s projections do account for. The table below reflects the projections MDP provided to the City. Please note that MDP also indicated in these projections that it had selected the Highest Development Pressure Method as the most realistic possibility for the City, which would add 892 new households by 2030. This also corresponds with the City’s other projections.

Methods	Population	New Population	Households	New Households
Lowest Devp Pressure	5,352	1,578	2,222	746
Highest Devp Pressure	5,703	1,929	2,368	892
Avg Devp Pressure	5,456	1,682	2,265	789

- On Page 37, the extrapolation and linear regression figures need to be qualified with a specific explanation of the process undertaken to create them. Rather than list a series of potential growth scenarios and their numbers, there needs to be specific language about which the City expects to use, why, and what

ramifications that method and number may have on the other elements of the Plan.

### Future Growth Areas

- It may be useful to create a "Growth Area Chart" which would list, for each growth area, the acreage, number of lots/parcels, and anticipated growth (# of residential units/square footage of commercial space) for each area.
- There are 5 future growth areas identified in the Plan which could add an additional 492 new households of capacity to the City. The Plan does recognize that there is already sufficient capacity in the City limits to accommodate the projected demand and notes that these future growth areas would primarily be a source for jobs and to address failing septic systems and wells. However, MDP feels that it is important to strive for the proper balance between land supply and demand to ensure that land is used as efficiently as possible.
- Also, it is important to note that if the City intends to submit all future growth areas for PFA certification, as it states on page 45 of the Policies and Recommendation Section, MDP is now required to perform an analysis of supply and demand for municipal PFA certifications, as a result of HB1141. This analysis looks at the available land supply as it relates to future demand to determine if additional areas are needed in the PFA to accommodate future growth. Currently the City has a capacity of 4,508 households, four (4) times the 2030 demand of 955 households.
- With respect to 'Growth Area 2', the proposed land uses are not consistent with the existing 'Suburban' Land Use Designation of the County Comprehensive Plan. However, the existing County Zoning of 'Town Transition' does appear to be consistent with the proposed uses within this growth area. Therefore, it would appear that an inconsistency exists between current County land use and zoning. It is recommended that the City work with the County on this issue.
- Within 'Growth Area 5', the proposed land uses are not consistent (within certain areas of the growth area) with the County's 'Low Density Residential' Land Use Designation, or with the County's "Heavy Industrial (I-2)" or "Agriculture-Rural (A-1)" zoning districts. It should also be noted that there currently exists Land Use and Zoning inconsistencies between the County's Comprehensive Plan and County Zoning Designations.
- Furthermore, within Growth Areas 1, 4 and 5, there are inconsistencies between the existing (and draft) Wicomico County Comprehensive Water and Sewerage

Plan and the proposed growth areas, which will require public services. Once again, it is recommended that the City work with the County on this issue.

- Regardless of the County's position, with respect to its review of the Municipal Growth Element, these inconsistencies between land use designation, zoning classification and water and sewerage plan designation need to be addressed within the City's Municipal Growth Element. Furthermore, these issues should be dealt with in the Implementation Element of the Plan.

#### General Municipal Growth Element Comments

- On Page 35, within the last sentence of the second paragraph, there is a reference to a "rural residential" land use category. This land use category is not reflected on either the "Existing Land Use Map" or the "Future Land Use Map".
- Pages 36 and 37, within the Background and Trend Data Section and the Population Projections Section, the text vacillates between references of MDP data and US Census data, and then MDP/US Census data, which may cause confusion to the general reader. In general, the Municipal Growth Element is not clear on what data source is being used and what methodology is being used, particularly with respect to the extrapolation and linear regression methodologies. It also appears as if the building permit data from Table 6-1 has been added into the projections for each methodology. This should be further explained, as it does not appear to coincide with the 2030 estimates, unless "double-dipping" figures from Table 6-1. Also, on Table 6-1, it does not seem appropriate to use "2008" data, when this is an incomplete year.
- On page 40, as well as elsewhere in the Plan, there is discussion of a TDR program. The Plan states that "[b]oth the residential-transition and the conservation area are appropriate as 'sending' properties as part of a transferable development rights (TDR) ordinance to create increased densities in residential growth areas southeast of the existing City limits, where future residential growth is more appropriate." This is a good idea, but the Plan should give more details about how the TDR program would work, as the concept may be difficult for the general reader, and is worthy of further discussion. This concept should also be discussed with Wicomico County as the County is currently looking at the feasibility of developing a TDR Program.
- On Page 42, the Public Schools Section is consistent with the objectives of Educational Facilities Master Plan and the objectives of the Maryland Public School Construction Program. However, it would be beneficial if the Plan provided the schools' actual enrollments, school enrollment projections and



capacity data. This information is used by the Public School Construction staff as another tool to measure consistency between the local planning process and the county's Educational Facilities Master Planning efforts. Furthermore, it is recommended that the City develop a municipal building permit and subdivision approval tracking system, and that this information be periodically (perhaps semi-annually) provided to the Board of Education.

- Page 43, the first bullet discusses "senior residential facilities" and its affect on the school system. This concept, while laudable, has impacts on other community facilities as well (e.g. EMS). Also, this concept is not reflected within the Housing Element, and this Department would suggest that further discussion of potential impacts by such a policy, with respect to affordable housing, is appropriate.
- Page 45, within the Parks and Recreation Section, a "fee-in-lieu" concept is discussed. However, it seems that the intent of the "fee-in-lieu" is intended to provide for a significant (existing) lack of recreation facilities. Indeed, the Plan states that the parks and recreation "deficit will be eliminated with the development of 1,800 new households". It should be noted that such a "fee-in-lieu" system can only be proportionate to the needs created by that proposed development. There should be some discussion (perhaps within the Community Facilities Element as well as the Municipal Growth Element) as to how the City intends to address the existing, and seemingly significant, shortfall in parks and recreation.
- The Municipal Growth Element should address how to correct several county "enclaves" via an annexation policy to improve upon the existing corporate boundary.
- The Municipal Growth Element should discuss in further detail issues about establishment of "green infrastructure", links of privately owned open space (within future subdivisions) to achieve "critical mass", intent of future open space (active or passive, natural or built recreation and park areas), etc.
- As reflected within the Community Facilities Section of MDP comments found above, for those 'facilities' such as Public Safety and Emergency Services that have "industry standards" such as "# of police officers needed per 1,000 residents", a thorough analysis is needed of what impacts each of the proposed growth areas would create. Perhaps a chart, which showed each of the growth areas and 'facility' needs created by each growth area, is appropriate. As an example, Growth Area 5 is proposed to create a great deal of commercial growth, which presumably would have a significant impact on Fire Company needs.

## WATER RESOURCES ELEMENT (WRE)

To ensure the adequacy of water supplies to support existing and future development as proposed in the Land Use Plan, the City of Fruitland Comprehensive Plan includes a demand forecast (p. 47) and compares this to expected capacity (p. 48). In addition, the Plan discusses methods of protecting the City's source water (pp. 76-77).

Comments on the water demand analysis include:

- The Plan states (p. 47) an average water use that is 154,000 gpd less than what is listed in the draft County WSP. The WSP also indicates a current maximum day demand for water at 550,000 gpd. The first paragraph in the City's "Well Production Section" (p. 47) needs to be updated to reflect current water demands and should include a discussion on the revised totals for future demands from growth areas.
- The Plan should include a discussion of the current capacity of the City's water treatment plant and whether or not available water treatment plant capacity will be a constraint on the City's growth needs.
- The Plan states that the "City currently has sufficient water supply capabilities to accommodate the current population and projected future growth with the four existing wells currently being used" (p. 48). The Plan should make it clearer that the "sufficient water supply capabilities" are in reference to the pump rate at its wells (as listed on p. 23) and that the current water appropriations and use permit does not allow for withdrawal amounts that would meet the City's anticipated growth needs. To help show the adequacy of water supply, on page 23, also list the pump capabilities in terms of millions of gallons per day (MGD).
- As required by the Municipal Growth Element, the public water needs for each of the municipal growth areas should be calculated and included in the Comprehensive Plan. Although the Plan currently cites "a City Engineer report" (p. 50) that provides an estimate of the public water needs to serve the City and "areas already approved for residential growth", the public water needs for each of the municipal growth areas are not specified.
- To help determine the public water and sewer needs for the municipal growth areas, the following information should be calculated and included in the WRE:
  - GA1 – how many existing homes are in this area and how much vacant land is available to add more homes? Calculate the water and waste water demands.

- GA2 – how many acres comprise this growth area and what is the expected water demand? Calculate the water and waste water demands.
  - GA3 – potential of 320 housing units, some commercial. Possible TDR receiving area for higher density than the expected single family housing development. Calculate the water and waste water demands.
  - GA4 – some of this area is already developed and will require the “southwest interceptor” for it to be served with public sewer. Potential of 172 DU’s, on top of existing development? Calculate the water and waste water demands.
  - GA5 – calculate the water and waste water demands.
- The Plan should include the City Engineer report as an appendix to the Comprehensive Plan or should include a reference to an online location for the report.
  - The Plan should note whether the City Engineer report makes use of the build-out estimates cited in the Plan or whether it uses a different methodology to determine public water needs at build-out.
  - The Plan should include a calculation and discussion of the public water needs that would be needed to serve any private water systems within the City and its proposed municipal growth areas.

Comments on the proposed methods for protecting the City’s source water:

- The City should be commended for including a discussion of source water protection in the context of mining activities (p. 76). However, the Plan should expand its policies and discussion of source water protection to include other potential threats to source water.
- The City of Fruitland Comprehensive Plan identifies the streams affected by land use impacts (p. 51), maps the watersheds that drain into the streams (Map 10), and identifies the WWTP discharge point location (p. 48). Although the Plan does not discuss whether the streams are suitable receiving waters for expected land use impacts, the Plan does include a nonpoint source pollution forecast and notes that nonpoint source nutrient loading will decrease under the proposed Land Use Plan (p. 51).

Comments on the sewer demand analysis include:

- The discussion of the sewer system on page 24 is adequate, however the information is different than what is in the Draft 2008 Wicomico County WSP.

The information should coincide, using whichever information is correct. The “southwest interceptor”, mentioned on page 24, to serve the southwest quadrant of the City is not discussed in the WSP. This “planned” infrastructure should be amended into the WSP as soon as possible.

- As required by the Municipal Growth Element, the public sewer needs for each of the municipal growth areas should be calculated and included in the Plan. Although the Plan currently cites “a City Engineer report” (p. 50) that provides an estimate of the public sewer needs to serve the City and “areas already approved for residential growth”, the public sewer needs for each of the municipal growth areas are not specified.
- To assist in the overall sewer demand analysis, including comparison to and evaluation of point source caps, the WRE could include a chart that outlines each growth area and the existing City sewer service area and that shows the number of residential units and the commercial and industrial acreage by current public sewer service demand, allocated service agreements, future service requirements (for residential, commercial, and industrial), and developed properties that are on septic systems that expect to be converted to public sewer service. Also, the chart would be helpful to have the TMDLs for nitrogen and phosphorous for each discharge and the combined total. This table should help to evaluate the system capacity needs and determine how much land will be needed for spray irrigation.
- As indicated on p. 24, the City might need to pursue spray irrigation in the future. The Plan could begin to outline a method for identification of lands for potential spray irrigation to ensure preservation for such use in the future.
- On page 50, the figure of 87,500 gpd for future commercial and industrial build out needs seems to be low. Using acreage flow figures of 1400 gpd for commercial calculations and 600 gpd for light industrial needs, the number of acres can be found by dividing the 87,500 gpd expected flow by the respective sewer demands per acre (1300 gpd – commercial and 600 gpd – industrial). This would yield a low and high acreage need at 62 acres (commercial use) to 146 acres (industrial use). Please provide the basis for the 87,500 gpd future commercial and industrial sewer flow demands.
- On page 50, the first sentence directs the City to explore alternative methods for and application of wastewater discharge. This effort should be added to the Policies and Recommendations Section on page 52.

Comments on identifying suitable receiving waters:

- The City should be commended for including a discussion of the impervious surface and open space changes associated with the Land Use Plan.
- The Plan should calculate the combined impact of point source (WWTP) and nonpoint source nutrient loadings. Although the Plan discusses the point source TMDL allocations (p. 51), the nonpoint source TMDL allocations should be discussed as well.
- The two scenarios discussed in the “Non-Point Source Summary” discussion (pp. 51-52) are two different ways of looking at the same land use plan. The Water Resource Element should investigate the difference in nutrient loading (point source and nonpoint source combined) from different proposed land use plans, and should then identify one land use plan as having the least impact.
- The proposed policy to “use stormwater best management practices” (p. 52) should clarify whether the policy is meant to go beyond current stormwater management requirements, including those proposed under the Stormwater Management Act of 2007.
- The Plan indicates that impervious surface will increase under the Land Use Plan. Note that Environmentally Sensitive Design (ESD) or Low Impact Development (LID), the focus of the new stormwater requirements, are used to collect, infiltrate, and treat stormwater runoff, which can help reduce the amounts of additional impervious surface.

**TRANSPORTATION ELEMENT**

- Suggest modifying the following goal and objective statements (Page 55).  
(The original statements are shown as *italic*; new additions are shown in **Bold**; and deletions are shown by ~~strike-lines~~.)
  - *Take advantage of the existing roadway system* **while maintaining its capacity and safety integrity.**
  - *Forster development near freeways and arterials* **while building well-connected local streets and roads to be part of the roadway network.**
  - *Provide alternative methods* **transportation modes for residents by improving pedestrian and bicycle facilities within the City and along intra-city roadways.**

- *Find public and private funding for building new roads, maintaining existing roadways, the maintenance of roadways, and creation of sidewalks and bikeways.*
  - **Implement access management strategies and discourage street access for new development along Main Street.**
- Page 58, the Plan calls for additional bicycle routes, but it didn't include any proposals. The Plan should identify and include planned bicycle routes throughout the City. The planned pedestrian and bicycle routes should connect to activities nodes/centers, e.g., commercial areas, offices, schools, parks, bus stops, and etc. MDOT funds pedestrian and bicycle facilities along state highways through several programs, such as Community Safety and Enhancement Program, Sidewalks and Bicycle Programs, Streetscapes and Minor Reconstruction Program, and Transportation Enhancement Program. The City may seek these funding programs for needed pedestrian and bicycle facility improvements in the City. The State also has other community development/revitalization programs which could provide funding for pedestrian and bicycle improvements even on local roadways.
  - The Transportation Element does not address the fact that the City is within the Salisbury/Wicomico Metropolitan Planning Organization (MPO), is represented on the MPO Technical Advisory Committee, nor does it discuss the benefits of being within the MPO, and what the City may do in furtherance of MPO goals.
  - Page 56, Table 8-1 indicates that Allen Road and Sharps Point Road are "neighborhood collectors", however, the Transportation Map does not reflect this, and indeed shows Hayward Avenue and Delany Avenue as "neighborhood collectors". Also, on this same page, as is with all other road classifications identified, perhaps a brief narrative discussion of "neighborhood collectors" is appropriate.
  - Page 58, Public Transportation Section, should provide more discussion about the Shore Transit system, as opposed to just a referral to another element of the Plan for this information.

#### **SENSITIVE AREAS ELEMENT**

- The Sensitive Area Element does not address "agricultural and forest lands intended for resource protection or conservation" as is required by Law. Given the fact that both within the existing municipal boundary, and within most of the proposed growth areas, these resources are present, there needs to be some discussion of this issue. Although green infrastructure is mentioned in the

Municipal Growth Element, it should also be discussed in the City's Sensitive Areas Element.

- Page 68, bottom of the page, there is a reference to "Appendix D", DNR Endangered Species in Wicomico County. Is there any data more specific to the City, rather than the County as a whole?
- As the Municipal Growth Element's 'Growth Area 1' contains significant Critical Area land, it is recommended that some analysis be provided, within this element, with respect to potential environmental impacts. How many lots within 'Growth Area 1' are in the Critical Area, how much Critical Area acreage exists and what other impacts are anticipated upon annexation?
- In recognition of the importance of protecting and restoring the Chesapeake Bay and its tributaries, including the Wicomico River, the Sensitive Areas Element should discuss how the City will contribute towards implementing the nonpoint source pollution goals of the Chesapeake Bay Tributary Strategy.

#### **MINERAL RESOURCES ELEMENT**

- Page 76 mentions small private water systems in and around Fruitland. What/where are these systems, as they do not seem to be mentioned within the Water Resources Element.

#### **PLAN IMPELENTATION ELEMENT**

- It is suggested by this Department that this element be more than just a reiteration of information outlined within other elements of the Plan. There should be significant discussion of regulatory streamlining, inter-jurisdictional cooperation, and necessary updates to the Zoning Ordinance and Subdivision Regulation, Adequate Public Facility Issues, Impact Fees, Consistency with Wicomico County Water and Sewer Master Plan, etc.

#### **GENERAL COMMENTS**

- Table of Contents, (Map Index Page) – The titles within the map index list do not match those titles on the maps themselves. Also, on the Map Index Page, Map 10 should state Wicomico River Watershed Map (not Nanticoke).
- General Formatting, throughout the Plan, various elements have sections entitled "Goals, Objectives, Policies"/"Goals and Objectives"/"Policies and Recommendations"/"Policies and Implementation". Also, within each of these

variously entitled sections, there is a varying use of “numbers and bullets”/“solid and hollow bullets”/“numbers and letters”. It is recommended that a consistent format be used throughout the document.

- Page 7, Location Section, first sentence, the Wicomico River does not border the current City Limits.
- Page 9, within the “interesting fact box”, it should state “over 70% of survey respondents stated...”.
- Page 9, Resident Survey Results Section, it is recommended that a copy of the survey be included within the Appendix. Also, the results of the survey have not yet been included in the Plan.
- Page 14, it appears that the second sentence in the third full paragraph should state, “In other municipalities, this age group ranges from 9.0% in Pittsville to **16.5% in Sharptown**” . Also, should the last sentence in the same paragraph end with “...the range is from **28.6% in Delmar** to 38.4% in Sharptown...”?
- Page 14, it appears that the first sentence in the fourth full paragraph should state “The median age of Fruitland is tied as the **second highest (with Mardela Springs)** of all other municipalities...”. Also, within the same paragraph the reference to a table should be Table 3-2 (not Table 2-4).
- Page 16 (and other affected tables) it is suggested that a notation such as “columns or rows may not match totals due to rounding” be added.
- Page 20, Table 3-8, it appears that all of the figures in the “Percent” column are incorrect.
- Page 21, Table 3-9, the 1990, Non-family Households figure should be 349 (as is reflected in text above the table).
- Map 3: Is this the Map that was provided by the MDP? If this map has been modified, within the Development Capacity Analysis of the Plan it should be clearly stated how such modifications were made (that is, what was the methodology, did ground-truthing occur). Also, it is suggested that the ‘cross hatching’ of the “developable land” and “approved development” categories be darkened or a different, more discernable, pattern be used.
- Map 4: there are two land use designations shown on the map that are not reflected within the legend (‘green and orange stripe’ and ‘purple and pink stripe’).



- Map 5: it appears that approximately one half of Growth Area 1 is missing the orange shading. If this area was intended to remain white, then some discussion within the Plan text needs to be dedicated to the purpose of the Planning Boundary shown on the map.
- Map 6: the title is misspelled. Also, the line pattern for sidewalks does not translate very well.
- Map 7: It is most likely that the term BFE is not recognizable by the average reader. Perhaps a brief discussion is appropriate.
- Map 9: The 100-Foot buffer is not applied to the non-tidal portion of the pond. Also, there are two patterns within the legend for "Palustrine -- Unconsolidated Bottom".
- Map 11: it is recommended that WHPA be spelled out, as this is an uncommon acronym.

