



Maryland Department of Planning

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December 15, 2009

Matthew C. Hull
Mayor of Keedysville
P.O. Box 359
Keedysville, Maryland 21756

Mayor Hull:

The Maryland Department of Planning (MDP) has completed our review of the Town of Keedysville's 2009 Comprehensive Plan Update. Thank you for your participation in the plan review process. The State of Maryland is committed to fighting the high financial, social, and environmental costs of sprawl development through effective Smart Growth and Neighborhood Conservation strategies.

The draft plan is a good faith effort to address many of the required elements of HB 1141, however, we recommend that you consider our comments and further refine the components contained in the legislation. The enclosure includes comments and recommendations from the MDP. Comments that appear in bold sentence or paragraph form require additional attention in order to strengthen the Plan. Please review our comments to ensure the Plans compliance with HB1141. Additional comments that may be forthcoming from other State agencies will be forwarded as we receive them.

The MDP would like to commend the Town for creating a Plan that understands and accommodates for the unique nature of the Town of Keedysville. Comprehensive Plans are strengthened when the local implementing tools reflect the visions and strategies of the plan. We recommend that within six months after adoption of the comprehensive plan amendments, the Town review it's Zoning and Subdivision Ordinances for consistency with the plan. MDP would like to remain involved and updated on that process as it moves forward.

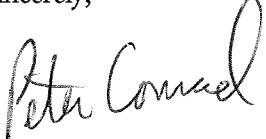
Honorable Matthew C. Hull

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Thank you again for the opportunity to review the Town of Keedysville's 2009 Comprehensive Plan Update. If you have any questions and/or require assistance, please contact the review coordinator David V. Cotton at 301-777-2161.

Sincerely,



Peter G. Conrad, AICP
Director
Local Government Assistance

Enclosure: MDP Review Comments

cc: David V. Cotton, MDP Regional Planner
Jason Dubow, Planner, WRE Coordinator
Rich Josephson, Director, Planning Services
Rita Elliott, MDP Clearinghouse



**Review Comments from the Maryland Department of Planning
Town of Keedysville
2009 Comprehensive Plan
December 15, 2009**

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

MUNICIPAL GROWTH ELEMENT

The purpose of the Municipal Growth Element (MGE) is to identify areas for future growth consistent with the long range vision of the Town for its future. The Growth Element should be developed based on consideration of several factors including population projections, an assessment of land capacity and needs and an assessment of infrastructure and sensitive areas. The Town may want to review MDP's Models and Guidelines #25 for more specifics on the requirements.

MDP has reviewed the Town's Municipal Growth Element and determined that although the plan meets the requirements of the HB 1141 legislation, a reorganization of capacity analysis related information, clarification on the infill development potential and a review of the Town's population projections are recommended.

Development Capacity Analysis & Population Projections

The Maryland Department of Planning appreciates the inclusion of population projections and an effort at a capacity analysis identifying the build-out potential in the Town and its annexation areas.

As the plan is currently written, the methodology of the Town's development capacity analysis could be clarified. A single table containing information such as existing capacity, infill capacity, pipeline development, housing units, existing and future (2030) population and acreage totals would strengthen the link between land supply and demand, as well as to illustrate the complete set of data and summary information used to arrive at the capacity analysis.

In order to assess the Town's balance between land supply and demand, infill development potential must be included in the plan. It was not clear whether the Town's figure of 14 vacant housing units represents total infill development potential within the municipality.

Keedysville's growth projections are not in line with MDP's Historical and Projected Population for Municipalities. According to the plan, the current population is 1,124 and the 2030 figure is 1,500. MDP population projections are significantly lower, at 578 (2010) and 837 (2030). The rapid growth that occurred between 2000 and 2007 was largely a result of annexations and may not continue into the future considering the limited availability of water and sewer infrastructure. The Town may want to consider reviewing its population projections.

According to the plan, the Town has identified 3 annexation areas consisting of 68 acres, yielding 241 dwelling units or 675 people. It appears, with these annexations and limited (14 vacant units) infill development capacity within the Town, Keedysville will have capacity to meet future growth by 2030. It is recommended that multiple annexations be prioritized based on a discussion of how the build-out analysis corresponds to projected growth.

The plan states that due to the rapid growth in single family housing from 2000-2007, the Town feels that using the 2.8 persons per household projection, which is based on 2000 Census Data, is most accurate to project population. MDP recommends that a 2030 population projection also be included as the number of persons per housing unit will change by the horizon year.

General Comments

- The Department appreciates the inclusion of land use by acreage (Table MG-8, Keedysville Proposed Land Use Classification).
- Table H-1 illustrates number of households and household change by year, not Projected Housing Units as labeled.
- The gap in text (top of page H-5) should be eliminated to avoid confusion.
- The existing Town limits were not apparent on either the Potential Annexation Area map or the Future Land Use map.
- It may help if the Annexations Map included information such as the name or priority number for each annexation, capacity information and the number of acres.

TRANSPORTATION ELEMENT

The Maryland Department of Planning (MDP) supports the transportation goals, policies and implementation strategies of Keedysville to develop a balanced, efficient, and equitable transportation system that provides a range of transportation options that reinforces the livability and sustainable neighborhoods in Town. We are also pleased that the Town supports pedestrian and bicycle facilities and other alternative transportation options. MDP would like to offer the following comments based on thoughts generated from the draft Keedysville's comprehensive plan.

The plan discussed transportation issues and some potential on-street improvements for accommodating pedestrians/bicycles on page T-2 and T-3, e.g., Main Street improvement needs, sidewalks that need repair, streets that could be restriped for pedestrian/bicycle paths. Specific strategies or actions addressing these transportation issues should be recommended and included in the plan. The recommendations for improvements should be included in Policies and Implementation Strategies on page T-4, T-5 or T-6 to ensure the future implementation.

With regard to Main Street (MD 845 A), the plan discussed its parking, sidewalks and traffic issues. The Town also expressed the desire for coordinating with SHA to improve Main Street's safety. A vision should be defined that calls for transforming Main Street to a complete street that provides safe and efficient movements for all modes of transportation. For more information on a complete street concept, please check out the link: <http://www.completestreets.org>. SHA provides several programs that help to enhance community character, e.g., Community Safety and Enhance Program, and Streetscape Program. The plan should include a recommendation to seek State funding to address transportation issues on Main Street.

The Town should address land use and access management strategies that protect the capacity and safety of MD 34, by limiting access points, buffering for residential areas, and limiting commercial developments. Low density residential development and two commercial areas are planned along MD 34. Access onto MD 34 should be carefully evaluated and coordinated with SHA.

Goal 5 (page T-4) – recommend adding “transportation” so that the goal reads, “Support and seek funding for bicycle and pedestrian shared use paths as a component of the recreational and transportation activities planned for the Town.” The plan recommends developing a bicycle and pedestrian path plan in coordination with the County (page T-5). The Town should also coordinate this effort with SHA. In addition, we recommend that the streets, sidewalks and bike-lanes be linked to various residential communities, commercial areas, parklands, and other activity centers.

Currently, streets in the Town are not well connected. Most traffic depends on MD 34 and MD 845A. When the Town grows, roads and streets should be built and connected to better serve the growing traffic. For a better circulation of local and through traffic, it will be good to build roads that parallel to MD 34 and MD 845A and a grid type of road network. The Town should consider a policy/strategy addressing street connectivity in the Town. In addition, a policy/strategy addressing transportation needs of new development should be included. The Town could require new development to assess transportation impacts, provide a well-connected street network including pedestrian and bicycle facilities, and connect with adjacent communities.

WATER RESOURCES ELEMENT

The WRE would meet the requirements of HB1141 with recommended amendments. The most important amendments to include are in **bold**. The WRE does not yet effectively address the following purposes of the law and/or State guidance, as follows, and discussed in more detail below:

- Identify suitable receiving waters and land areas to meet the stormwater management and wastewater treatment and disposal needs of existing and future development proposed in the land use element of the plan, considering available data provided by MDE (Section 1.03(iii), Article 66B).
- For each watershed, calculate the total forecasted nutrient load, which includes nutrient loads from current and future WWTP discharge, septic tanks, and stormwater runoff. This can be found in the Maryland Department of planning Models and Guidelines Number 26 (MDP M&G 26, p. 13).
- Does the WRE identify strategies to protect current and future water sources from pollution (MDP M&G 26, p. 27).

- Does the WRE describe the alternative future development options for which nonpoint source and point source loading estimates were performed? Does the WRE make general findings for alternative land use options (MDP M&G 26, pp. 39-40).

Demand Analysis Comments

- **It is unclear whether the water demand table includes projected non-residential water demand figures (p. WR-3). Although the percent of non-residential acreage in the town is projected to be low (p. MG-9), the water demand table (p. WR-3) should still include water demand from the non-residential uses.**
- The County Water and Sewerage Plan notes on page III-8 of the plan that the Utilities Commission requires new major subdivisions to provide a minimum new water supply of 100,000 gpd in the form of a well to be connected to the existing system. The Town might consider discussing this in its WRE as a possible way to solve the projected future water deficit.
- The plan does not state whether there are any private wells in the Town. Please add this information to the WRE. If wells exist, please note whether there are any plans to connect any failing wells to the public water system and the capacity needed to serve them. The plan could then discuss whether they are susceptible to pollution and whether these might be included in future source water protection plans.
- The WRE states that Keedysville is currently planning its own storage tank and booster station (p. WR-1). It would be helpful if the WRE indicated the capacity of the storage tank and a timeframe for the completion of this work. This capacity is identified as 300,000 gallons in the 2008 Draft County Water and Sewerage Plan.
- MDE recommends using 250 GPD per dwelling as a water planning figure. Keedysville's WRE, however, uses a lower water planning figure - 200 GPD per dwelling. The Town could consider using a higher water planning figure in order to be more conservative with water demand projections.
- The WRE states that an additional 32,000 GPD of water supply will be needed by 2030 in order to accommodate future growth in the Town (p. WR-3). The current number of households is 406 (p. WR-2) and the projected number of households for 2030 is 560 (p. WR-3). There will therefore be an additional 154 households projected to be built in the Town by 2030. If you multiply the 154 households by the Town's water planning figure of 200 GPD per dwelling (p. WR-3), the total projected water demand supply is 30,800 GPD. This figure is 1,200 less than the projected figure of 32,000 GPD listed in the WRE (p. WR-3). Please clarify why there is a difference in projected water demand figures.
- There is an inconsistency in numbers found between the WRE and the MGE. The WRE states on page WR-2 that an additional 32,000 GPD of water supply will be needed to support projected growth through 2030. However, on page MG-10 of the MGE, the plan states that an additional 26,000 GPD will be needed to support growth projected to 2030. Please clarify why there are two different projected water demand projections in the two sections of the comp. plan.

Source Water Protection Comments

- The WRE mentions that diatomaceous earth filters were installed in 1998 to prevent contamination to surface water; however, **the WRE should also include planning strategies to protect the town's groundwater from pollution.**

Sewer Demand Analysis Comments

- **The plan does not state what body of water the County's WWTP discharges into. Please add this information to the plan.**
- It is unclear whether the sewer demand table includes projected non-residential sewer demand figures (p. WR-4). Although the percent of non-residential acreage in the Town is projected to be low (p. MG-9), the sewer demand table (p. WR-4) needs to still include sewer demand from the non-residential uses.
- The plan states that the County has plans to increase the capacity of the sewer treatment plant (p. WR-4). If possible, please include a projected timeline for the completion of these upgrades and **note whether the town's WWTP cap, established under the Maryland Tributary Strategy, will present a barrier to expanding the town's capacity.** For minor WWTPs, the cap will be implemented when the WWTP is expanded.
- Keedysville is provided sewer treatment by the Antietam Water Reclamation Facility that is operated by Washington County. **The plan states that the design capacity is 163,000 GPD; however, the WRE also should list the WWTP's permitted treatment capacity (p. WR-1) since this is the current constraint.**
- The plan states that the Town has adopted and enforces the Maryland's 2000 Stormwater Management Design regulation (p. WR-2). The plan should note, however, that updated design regulations are available from May 2009.

Suitable Receiving Waters Comments

- **The plan should discuss the suitability of the receiving waters.** Since TMDLs have not yet been established for nutrients in the Antietam Creek to date, the WRE should state that since TMDLs have not yet been set, it is not possible to discuss the suitability given the lack of information at this time. Please add this discussion to the plan.
- **The plan does not yet include present or future point source (WWTP) loading data/forecasts. This information needs to be added to the plan.** The WRE should indicate when the Town's point source loading is expected to reach its point source cap. MDE can provide information on the town's WWTP cap, established under the Maryland Tributary Strategy.

- The plan does not yet include future non-point source pollution loading data/forecasts. This information needs to be added to the plan. The town should work with Washington County and MDE to complete this forecast.
- Once a point source pollution forecast and a projected non-point source pollution forecast are added to the plan, the Town should also include a combined point source and non-point source pollution table. Please add this to the plan.
- The WRE should evaluate the forecasted pollution impacts (point and non-point source pollution combined). In this evaluation, at least two land use plan options (including growth areas) should be evaluated to determine which land use plan would have the least impact on receiving waters.

General WRE Comments

- The plan does not yet include maps of the water and sewer service areas. Please add these maps to the plan.
- The water and sewer demand tables could be improved if a capacity row was added to each in order to better compare the projected demand with the permitted capacity.
- The water partnership between Keedysville and Boonsboro is discussed briefly in the WRE (p. WR-1). It would be helpful if the discussion also explained how this relationship provides for the future shared capacity as well as the availability of water for the Town in the future. The County Water and Sewerage Plan notes that Keedysville purchases water from Boonsboro. This fact could also be noted in the WRE.
- The WRE states that Keedysville is currently home to 1,124 residents and 406 households, which are projected to grow to a population of 1500 residents and 560 households by 2030 (WR-2). The MGE, however, states that the 2007 population is 840 residents (p. MG-2). Please clarify why there is a difference in these two current population figures.