



Larry Hogan, Governor

Robert S. McCord, Acting Secretary

Boyd Rutherford, Lt. Governor

April 23, 2018

Mr. Alex Perricone, Chair  
Town of Manchester Planning and Zoning Commission  
3337 Victory Street  
Manchester, MD 21102

LOCAL PLAN REVIEW: Town of Manchester Comprehensive Plan Draft #1

Date Received: February 23, 2018

Dear Mr. Perricone:

Thank you for the opportunity to comment on the Town of Manchester 2018 Comprehensive Plan Draft #1, and your participation in the State agency plan review process.

The Maryland Department of Planning (Planning) believes that good planning is important for efficient and responsible development that successfully addresses resource protection, adequate public facilities, community character, and economic development. Planning's attached review comments reflect the agency's thoughts on the strengths of the Town's plan, as well as potential ways to improve it and best satisfy the requirements of the State Land Use Article.

The Department forwarded a copy of the Town of Manchester 2018 Comprehensive Plan Draft #1 to State agencies for review including, the Maryland Historical Trust and the Departments of Transportation, Environment, Natural Resources, Commerce, Housing & Community Development, and Agriculture. To date, we have received comments from the Maryland Historical Trust, Housing & Community Development, and Environment; these comments are included with this letter. Any plan review comments received after the date of this letter will be forwarded to you upon receipt.

Planning respectfully requests that this letter and accompanying review comments be made part of the Town's public hearing record. Furthermore, Planning also asks that the Town consider our comments as revisions are made to the draft Plan, and to any future plans, ordinances, and policy documents that are developed in support of the Plan.

Planning is eager to provide support or clarification in the continued development of Manchester's Comprehensive Plan. Please feel free to contact Steve Allan, regional planner at (410) 767-4572 or Joseph Griffiths, Manager of Local Assistance and Training, at (410) 767-4553.

Sincerely,

Charles W. Boyd, AICP  
Director, Planning Coordination

cc: Pat Keller, Assistant Secretary for Planning Services  
Joseph Griffiths, Local Assistance and Training Manager  
Steve Allan, Regional Planner  
Lynda Eisenberg, Acting Planning Director, Carroll County Department of Planning  
Steven L. Miller, Town Administrator

**Maryland Department of Planning Review Comments**  
**April 19, 2018**  
**Town of Manchester 2018 Comprehensive Plan Draft #1**

The Maryland Department of Planning (MDP) has reviewed the Town of Manchester Planning Commission's 2018 Comprehensive Plan Draft #1 and offers the following comments for your consideration. These comments are offered to guide the Town in ways to improve the draft comprehensive plan and better address the statutory requirements of the Land Use Article.

**Summary of the Proposed Comprehensive Plan Amendment**

This is a full update to the 2008 Town of Manchester Comprehensive Plan. Overall, the plan is well written and presents a logical progression of elements that will help address the many challenges of future growth in a thriving economic region such as ours. In particular, the Plan frequently emphasizes the importance of maintaining the “small town” character that Manchester rightfully cherishes and values, and lays out thoughtful strategies in the implementation section about how such character might be achieved, maintained, and strengthened.

**General Observations**

- This document is well organized and informative.
- There appear to be very few typographical errors.
- Sources, with complete citation, should be provided for all statistics presented.
- Footnoting should be considered to explain some data choices and calculations.
- It appears that in the Demographics Element two concepts are being conflated: population based on census data and population based on land use analysis.

It is also apparent that the Plan focuses on and predicates much of the Town’s future on the construction of the Manchester Bypass. While it is important for any planning document to have a clear focus, it remains equally important to consider the implications of such a project in the realm of unintended consequences. As the enclosed comments will hopefully demonstrate, a Bypass could have the unfortunate effects of dampening business performance in the historic downtown while drawing development pressure to areas east of the town that might cumulatively have more of a detrimental effect on the town’s character than if current conditions were allowed to persist. Planning recommends that the Town work with the County and the State to consider other ways of alleviating traffic congestion while exploring options to preserve the Town’s character going forward.

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### **Minimum State Law Requirements for Municipalities**

Maryland's Land Use Article sets forth the required components of a local comprehensive plan but does not mandate a specific format. As such, local governments have addressed these required elements in a manner that fits the needs of their community and the resources available to respond to the issues explored during the planning process. The following checklist summarizes an assessment as to whether each required local plan element is addressed in the Town of Manchester 2018 Comprehensive Plan Draft #1.

Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans			
State Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Town of Manchester 2018 Comprehensive Plan Draft #1 Page References
(1) A comprehensive plan for a non-charter county or municipality <b>MUST</b> include:			
(a) a community facilities element	<a href="#">L.U. § 3-102(a)(1)(i)</a>	<a href="#">L.U. § 3-108 -- Community facilities element</a>	Pages 64-80
(b) an area of critical State concern element	<a href="#">L.U. § 3-102(a)(1)(ii)</a>	<a href="#">L.U. § 3-109 -- Areas of critical State concern element</a>	Page 87
(c) a goals and objectives element	<a href="#">L.U. § 3-102(a)(1)(iii)</a>	<a href="#">L.U. § 3-110 -- Goals and objectives element</a>	Pages 10-17
(d) a land use element	<a href="#">L.U. § 3-102(a)(1)(iv)</a>	<a href="#">L.U. § 3-111 -- Land use element</a>	Pages 41-49
(e) a development regulations element	<a href="#">L.U. § 3-102(a)(1)(v)</a>	<a href="#">L.U. § 3-103 -- Development regulations element</a>	Pages 90-98
(f) a sensitive areas element	<a href="#">L.U. § 3-102(a)(1)(vi)</a>	<a href="#">L.U. § 3-104 -- Sensitive areas element</a>	Pages 25-36
(g) a transportation element	<a href="#">L.U. § 3-102(a)(1)(vii)</a>	<a href="#">L.U. § 3-105 -- Transportation element</a>	Pages 81-85
(h) a water resources element	<a href="#">L.U. § 3-102(a)(1)(viii)</a>	<a href="#">L.U. § 3-106 -- Water resources element</a>	Page 88-89
(i) a mineral resources element, IF current geological information is available	<a href="#">L.U. § 3-102(a)(2)</a>	<a href="#">L.U. § 3-107 -- Mineral resources element</a>	Page 86
(j) for municipalities only, a municipal growth element	<a href="#">L.U. § 3-102(a)(3)</a>	<a href="#">L.U. § 3-112 -- Municipal growth element</a>	Pages 50-63
(h) for counties only if located on tidal waters, a fisheries element	<a href="#">L.U. § 3-102(a)(4)</a>	<a href="#">L.U. § 3-113 -- Fisheries element</a>	N/A
Optional:			
(2) A comprehensive plan for a non-charter county or municipality <b>MAY</b> include: (a) a community renewal element; (b) a conservation element; (c) a flood control element (d) a housing element; (e) a natural resources element; (f) a pollution control element; (g) information concerning the general location and extent of public utilities; and (h) a priority preservation area (PPA) element	<a href="#">L.U. § 3-102(b)</a>	<a href="#">L.U. § 3-102(b)(2)(i)</a>	Not specifically included in the plan as separate elements, some of the issues are addressed more generally in the plan.
(3) Visions -- A local jurisdiction <b>SHALL</b> through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	<a href="#">L.U. § 3-201(c)</a>	<a href="#">L.U. § 1-201 -- The 12 Planning Visions</a>	Pages 8-17. Unclear whether all of the 12 Visions are included.
Optional:			
(4) Growth Tiers -- If the local jurisdictions has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the jurisdiction's comprehensive plan	<a href="#">L.U. § 1-509</a>		Municipal Growth Tier map adopted but not incorporated into the plan. No County Growth Tier Map adopted

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As shown in this checklist, the Town of Manchester 2018 Comprehensive Plan Draft #1 includes all the required elements, as identified in §1-406 and §1-414 of the Land Use Article of the Maryland Annotated Code. The draft plan includes nine vision statements and 36 goals that direct the future development of the Town. However, it is unclear how the State's 12 planning visions were considered in formulating these vision and goal statements. While it does appear apparent in some instances, it is recommended the plan be revisited to strengthen tie between the State planning visions and the Town's visions and goals.

**Technical Comments/Corrections/Suggestions**

The following is a series of identified minor corrections or suggestions that the Town of Manchester Planning Commission may want to consider to improve the readability of the document:

- Page 2        Please clarify that Article 66B has been replaced by the Land Use Article.
- Page 4        The Manchester Bypass is first mentioned here and appears subsequently in many places throughout the plan, but we note that the project is not in the current or recent County Highway Needs Assessment, nor in the County's priority letter to Maryland Department of Transportation (MDOT).
- Page 4        The Distance chart does not include other potentially significant traffic destinations or points of origin in Pennsylvania, such as York, Carlisle or Spring Grove.
- Page 11       Reference is made to the vision of small town character that must be preserved. While this is a worthy ideal, the concept of small town character is a qualitative element that is difficult to define or defend, unless it is described more fully. It is also very difficult to impose a population cap very far into the future, while noting that the previously imposed cap in the 2008 Plan has already been exceeded.
- Page 10-17     The town lists 9 visions that are unique to Manchester. This is a worthy approach, but the towns should also consider incorporating the State's 12 visions into the plan.
- Page 17       The plan mentions the Manchester Bypass again as the first goal of Vision #9 with a sense of urgency. However, we note that the project is not in the current or recent County Highway Needs Assessment, nor in the County's priority letter to MDOT. Planning recommends that the Town work with the County and the State to consider other ways of alleviating traffic congestion while exploring options to preserve the Town's character going forward.
- Page 20       An enhanced revitalization program is a good idea, and since the Town already has an approved Sustainable Communities (SC) designation, the town might

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consider historic rehabilitation tax credits available through Maryland Historic Trust (MHT), and the wide variety of funding sources available from Maryland Department of Housing and Community Development (DHCD) such as the Main Street program, Community Legacy and the Strategic Demolition program.

- Page 20        Married persons should not be defined strictly as Husband-Wife in 2018 under current State law.
- Page 23        The table of non-family households includes number of companies in town. This information may be better placed in Table 3D below.
- Page 24        The Municipal Growth Element (MGE) has been required for Maryland municipalities since 2009.
- Page 30        The Land Use Article reference for preparing a sensitive areas element is §3-104
- Page 37        It would be helpful to move the Planning Nodes map to the beginning of the chapter, rather than the end.
- Page 39        The SC plan to support the plan's objective to strengthen the downtown area is a sound approach utilizing state and local resources.
- Page 41        The preface states that 237 homes populated by 683 residents might be added. This is the first reference to this forecast, but it does not indicate that it is a 50% scenario that is explained in more detail later.
- Page 41, 42     Explain how the establishment of design guidelines and regulations can maintain and strengthen the vision of small town character.
- Page 43        Consider revisiting the policy statement about "a population cap of 5,000" since it the plan notes the cap has been surpassed, and given the statement on page 41 regarding an additional 237 homes and 683 people above the 2016 estimate of 5,349.
- Page 46        According to the current master plan, 474 homes could be added, but only 237 are estimated to be developed. This is a difference of 50%, which should be explained as the 50% scenario. Please include the analysis that supports this finding as an appendix.
- Page 49, 55     The comprehensive plan map showing the town's corporate boundaries contains 11 or 12 enclaves of unincorporated areas within town limits. We note that elimination of these enclaves by future annexation is acknowledged as an objective in the Municipal Growth Area (MGA) on page 55, representing a sound planning approach.

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- Page 52      Table 7A illustrates population growth from 1930 to 2010, but mention is made on page 43 of the 2016 estimate. This estimate should be added to Table 2A to provide context for the large (44.4%) increase from 2000 to 2010.
- Page 63      Consider moving the MGA map to the front of the MGA chapter to set the stage for what follows.
- Page 88      Consider renumbering the Water Resources Element (WRE) to appear after the MGE and before the transportation chapter OR after the natural resources chapter to improve the logical progression of the chapters.
- Page 90      3<sup>rd</sup> paragraph should read that “groups should be informed *and apprised* about....”
- Page 90      The description of the 66 elements being analogous to a train is thoughtful, clever and helpful to the reader.
- Page 93      Item 8. Typographical error “Rout(e)”
- Page 99.      Consider moving the comprehensive plan map to the front of the document to set the stage for what follows.

### **Detailed Section Review Comments**

The following are detailed comments on various chapters of the Town of Manchester 2018 Comprehensive Plan Draft #1:

#### **Chapter One – Comprehensive Plan update element**

- Page 4.      The goal of promoting main street businesses and encouraging shoppers to visit runs counter to the effect of the bypass. The Town may not recognize just how much traffic the bypass could remove from main street: Through traffic may provide access for many of the shoppers; conversely, many of the local patrons may use the bypass to drive elsewhere to shop. The plan should consider the effects of the Hampstead bypass had on that town’s historic retail core when proposing a similar major land use-transportation change to Manchester.
  - If the bypass is built, it will be important for local streets to connect to main street not just through roads but through walking/ biking trails. Goal two under Vision 9 partly addresses this: “Despite the serious need for the bypass, the town should advance new transportation concepts and alternatives, featuring small-town modes, to serve local residents and the downtown area. These modes include walking, biking, hiking, and driving” (page 17). Many of the visions, goals, and recommendations in the transportation chapter relate to making main street more accessible and appealing, which is commendable.

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- Page 7 Broadening the tax base should consider utilizing multiple land uses besides single-family houses, because the cost of services probably will outweigh tax revenue generated by the house and the residents.

## **Chapter Two – Visions and Goals Element**

- Page 10 The Visions and Goals are good; those below are highlights.

Vision 2: Planning nodes—the vision calls for small area plans, which the Town is encouraged to develop.

Vision 3: Preserve the Small-Town Character—The goal calls for a population cap. “Limiting the town’s growth is tied to Manchester’s ability to provide needed public services such as drinking water, police protection, and recreational facilities” (page 11).

The Plan should indicate which service limits, if any, allow for a long-term cessation of development and which services and facilities must be provided eventually.

- Chapter 6 says that the town population needs adequate services and facilities at the time of buildup;
- Chapter 7 refers to the need to pay for adequate public facilities in future annexations. (Other parts of the plan refer to adequate facilities as well).
- Chapter 8 addresses paying for future facilities by recommending that the town “review and recommend funding program amounts and sources for capital projects to maintain an adequate level of public facilities/services.... Growth should not outpace the town’s ability to provide essential public facilities/services.” Chapter 8 then goes into detail about the adequacy of sewer and water capacity.

Vision 4: Natural Resources and Sensitive Areas Element—The visions are strong and ambitious.

Vision 5: Land Use Element—Goal Six is an excellent assertion about land preservation and recreation. “Land use designations for existing and planned open spaces, parks, and linear greenways should be protected through preservation, conservation, development regulations, and other methods for the benefit of all residents and neighborhoods” (page 13).

Vision 7: Community Facilities Element—Goal Five is an excellent assertion about parks, recreation, and open space. “Maintain and strengthen the social and health benefits of sports and recreational programs for seniors, residents, youth, and others. Increase the accessibility and use of publicly owned open space, green ways, and parks, which give Manchester its small-town character and feel of openness providing opportunities for residents to enjoy the outdoors and meet their neighbors” (page 15).

## Chapter Three - Demographics and Housing Element

Planning's Projections and State Data Center Unit reviewed the Town of Manchester 2018 Draft Comprehensive Plan and offer the following comments:

- Page 18        The penultimate paragraph on says that the population grew 53% from 1980 to 1990. The final paragraph says that the population grew 56.3% during "the decade of the 1980's." These two statistics appear to contradict one another.
- Page 18.        3<sup>rd</sup> Paragraph: "The town grew to 5,350 residents by year 2016." This population figure for the town of Manchester is not consistent with data reported by the Census Bureau. As shown at the Maryland State Data Center website, [Municipal Estimates page](#), total municipal population for Manchester town—as of July 2016—was **4,818**. Please correct the 2016 population number or explain why 5,350 is being used.
- Page 18        Sub-section on Population Change and Trends, 1<sup>st</sup> Paragraph, 2<sup>nd</sup> Sentence: "From 1930 to 2010 the town's average rate of growth (per decade) was 27%." This may be a typing error, if not please clarify how the 27% figure was calculated.

Several techniques are commonly used to measure annual growth rate. Using the annual average would show that the Town of Manchester's population increased an average of 8.1 % per year between 1930 and 2010. Over the same period, calculating the town's average annual growth rate (AAGR) shows growth of **29.3** percent per decade or **2.9** percent per year. Finally, a compound annual growth rate (CAGR) would indicate that the town grew **25.4** percent per decade or **2.5** percent per year over 80 years.

- Page 18        Sub-section on Population Change and Trends, 2<sup>nd</sup> paragraph, 3<sup>rd</sup> sentence: "The 1980 population of 1,830 people grew to 2,810 in the year 1990, an increase of 970 new residents." Please correct to **980** new residents.
- Page 18        Last paragraph. The first sentence is difficult to understand. Please simplify.
- Page 19        1<sup>st</sup> sentence: "Projected population for the year 2020 is 5,710..." More information is needed to better understand this 2020 projection. The reported projection is far larger than what would be expected had the town continued to grow at an average annual growth rate (AAGR) of 2.9 percent.

According to the State Data Center, Manchester's 2015 and 2016 population is 4,818. If we assume that the town continues to grow at its historic average annual growth rate of 2.9 percent, then in 2020, population should be about **5,376**. If we assume that the town's projected growth rate was to match Carroll County's projected growth rate, from 2010 to 2020, then Manchester's 2020 population would be a projected **4,876**. (Note: The State Data Center projects that Carroll County's population would increase

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from 167,134 (2010) to 169,200 (2020)— this is an annualized population growth rate (CAGR) of 0.12 percent or 1.2 percent for the decade).

- Page 19 The 2020 figure in Table 3A seems questionable. Please consider revising as noted above. Otherwise, it would be advisable to describe the process used by the town to develop its 2020 projection. If available elsewhere, please indicate where to find this information.
- Pages 20-23 The demographic data presented describes the Town of Manchester of 2000 and 2010. It is unclear why more recent demographic data, available from the [American Community Survey](#), is not used.

Please consider including demographic and socioeconomic data from the most recent American Community Survey (ACS): 2012-2016 5-year estimates.

The Town of Manchester may have legitimate issues with the American Community Survey estimates. This concern might explain why the socioeconomic data presented is restricted to the Decennial Censuses (2000, 2010). If there are issues, then these issues should be laid out in a footnote or appendix.

- Page 21 Last paragraph. It is incorrect to say average household median income. It is either one or the other—average household income or household median income.
- Page 22 Please identify a detailed source for the number of companies in town. Unable to verify the number reported (381) with other sources.
- Page 22 Sub-section on Population by Age Groupings, 2<sup>nd</sup> paragraph. Please consider rewording the phrase “The working-age people group...”
- Page 23 Table 3D- Population by Industry and Class of Worker. This Table shows in which industries Manchester residents work but does not show information on class of worker (i.e., self-employed, employed in private sector, employed in public sector, or employed by non-profit). This table is also limited to 2000 and 2010 data; more recent information on Population by Industry would be helpful.
- Not addressed in this sub-section on industry and workers are the following: How many persons live and work in the town of Manchester? How many persons commute to Manchester for work? How many Manchester residents commute for work? Where do those Manchester residents work? This type of analysis would tell more about growth/job growth in Manchester. Should consider using the Census Bureau's [OntheMap](#) application which could answer questions about the local economy and workforce.
- Chapter Six – Land Use Element, page 42, graphic. The 2016 population estimate shown in the graphic is 5,349— this number is not consistent with the Census population number shown just above it in the graphic. Please identify the source of the 5,349 estimate and explain how it is reconciled with the Census.

## **Chapter Four: Natural Resources and Sensitive Areas Element**

Planning's Resource Conservation Unit reviewed the Town of Manchester 2018 Draft Comprehensive Plan and offer the following comments:

- Pages 26 – 30        The Vision and goals are good, especially Goal Four, which deals with storm water management. This goal, however, also points to concerns about this section. Good storm water measures are to be “promoted”; Goal Three calls for promoting ““quality-of-life” (i.e. more open space)”; Goal Five calls for mitigation “when full protection for sensitive areas is not possible” (page 26). Well head protection, described on page 29, says that well heads “should” have buffers in which development “should” not occur. Page 30 says that steep slopes and erodible soils “should” be protected and development there “restricted.”
  - Consider strengthening language, where appropriate, to directly state what the Town will do to implement these goals.
  - The connection between these goals and their implementation, as outlined in Chapter 13, is not always clear. For example, while page 30 says that development on steep slopes should be restricted, Chapter 13 only recommends standards and programs for tree planting on steep slopes, and does not mention development restrictions (Pages 92-93). The Town could change language in either section of the plan, but should aim for consistency.
  - The Town may want to consider mandatory buffers around well heads, like those required for streams (Pages 92-93), especially since a fractured rock aquifer in the Marburg Formation is the Town’s source of drinking water, as noted in the Carroll County Water Resources Element of 2010.
- Page 32        Minimum stream buffers, on the other hand, are required.
- Page 34        The discussion of greenways and linear parks calls for acquisition of “open space lands” through the subdivision or development review process or through “dedication, conservation easement, or donation.” We recommend that the plan also describe how Manchester gets its park and open space requirements, and park development/maintenance priorities, addressed through Carroll County’s Land Preservation, Parks, and Recreation Plan process every five years and annually through the county’s POS Annual Program.

## **Chapter Five – Planning Nodes Element**

- Planning appreciates the Town’s foresight in adding this non-required element. The “Downtown Public Parking Area (Node #3) does not appear to be depicted on Map 3. Additionally, it is unclear what area is included in the “Priority Funding Area (Node #5),” since this area is not shown on Map 3. Planning cannot advise whether the PFA Node matches the Town’s current Priority Funding Area as shown on the Maryland Department of Planning’s interactive [webpage](#)

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(<http://mdpgis.mdp.state.md.us/PFA/publicinfotemplate/index.html>). It should be noted that the PFA for the Manchester area includes land both in the town and in the unincorporated county. Furthermore, the statement “To qualify for PFA designation, a municipality's PFA must match the jurisdiction's corporate limits as it existed in 1997” (page 39) is not accurate. For a municipality to locally designate part of its jurisdiction a Priority Funding Area (PFA), it must be (1) designated a local growth area in the comprehensive plan, (2) be zoned for employment zoning or zoned for residential density at least 3.5 dwelling units per acre, and (3) planned to be served by either public water or sewer within the next ten years, as shown on the county's water / sewer master plan. A municipality can expand its PFA if it meets these requirements.

## Chapter Six - Land Use Element

- Page 32        Goal six, land preservation, says the following: “Land use designations for existing and planned open spaces, parks, and linear green spaces should be protected through acquisition, preservation, conservation, development regulations, and other methods for the benefit of all residents and neighborhoods.” The recommendation above for Chapter Four about participation in the county's LPPRP and POS Annual Program applies here as well.
- Page 44        describes the Community Residential, Medium Density Residential, and Low Density Residential land use designations. It seems that the town goals of small-town character, open space, and infill development—as well as reduced service costs—might be better served if the low-density areas remained undeveloped and somewhat denser small-town development occurred. The first technique that comes to mind for achieving this is to turn the low-density areas into Transfer of Development Rights (TDR) sending zones, and make higher density and infill areas, plus commercial areas, receiving zones. The water recharge issue might be addressed by preservation easements being put on the sending areas after the development rights are sold.
- Page 47        The first objective at the bottom of the page says, “To maintain Manchester's small-town character, all vacant parcels and underdeveloped land in town eligible to develop under the Manchester Zoning Ordinance and Subdivision Regulations, that have not already received preliminary approval from the Manchester Planning Commission, should use design guidelines that promote more open space, greenways, and/or link-ups with existing open space/greenways as shown on the Comprehensive Plan Map.” Planning recommends that the planning commission base its approvals, in part, on a project's adherence to these guidelines.

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- Page 48 contains the following very good objectives: “The planning commission should consider new guidelines that encourage public open spaces in new developments projects” and “The town should consider acquiring, when possible, open space lands for public use, including greenways, walking trails, buffer areas, etc.” Again, the town must work with the county to secure state POS funding to acquire land for parks, open space, etc.

## Chapter Seven – Municipal Growth Element

- Page 53 Paragraphs 2-3: “The town grew from 3,329 persons in the year 2000 to a population of 5,350 in the year 2017 (a 3.7% annual rate of growth) ... The rate of growth for the last seven years (2010 to 2017) was moderate at an annual rate of 1.6%.” These rates of growth are not consistent with the growth trend presented in the Demographic Element. There is a disconnect between the Demographic Element and other parts of the document. The 2017 figure appears to be hypothetical, a what-if scenario.
- The Comprehensive Plan assumes that in 2017 the town of Manchester’s population would stand at 5,350. Yet, based on historic trends, it is unlikely that the town would add over 500 persons in a single year. Moreover, nothing has been presented in the Comprehensive Plan to suggest such a population increase. Please consider raising or explaining more completely.
- Aside from mixing a census figure (2010 population) with a what-if scenario (2017 estimate), no justification has been provided to assume a moderate 1.6 percent annual rate of growth for the town of Manchester. Calculations based on population data, from the American Community Survey 5-year estimates, show that the town of Manchester increased at an annualized rate of 0.77 percent from 2010 to 2016.
- Perhaps, it would be best to disentangle, separate or isolate the discussion on population trends (1930-2016) from the presentation on future populations (2017-to horizon year).
- Page 58 Table 7G clearly shows how the Town calculates its population estimates. To estimate the 2017 population, the number of dwelling units is multiplied by average household size. Does the number of dwelling units represent actual occupied units or units that are ready for move-in as of 2017? Also, are vacant housing units, abandoned housing units, and dilapidated units subtracted from the 2017 count of total dwelling units? Is there a vacancy factor that is applied when calculating future population? Please consider explaining in more detail.

## Chapter Eight - Community Facilities Element

- Pages 71-73 describe the Town’s park facilities and objectives for the future. This would be a good place to detail the POS funding process and how the town must coordinate with the county for state park and recreation funds, as recommended above.

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## Chapter Nine - Transportation Element

Planning's Infrastructure and Development Unit reviewed the Town of Manchester 2018 Draft Comprehensive Plan and offer the following comments:

- Planning appreciates the Plan's goal to improve non-vehicular modes of transportation for pedestrians and cyclists. The Town might consider developing and adopting a bicycle and pedestrian master plan, which could identify strategies to improve non-motorized transportation. Providing alternative transportation solutions to the single occupancy vehicle may help reduce traffic congestion in Manchester. Such a plan may help the town address gaps in bicycle and pedestrian infrastructure, funding mechanisms, project prioritization, phasing and implementation.
  - SHA's Transportation Alternatives Program may be a funding option for sidewalk construction on State roads. More information can be found at <http://www.roads.maryland.gov/Index.aspx?PageId=144>.
  - MDOT's Bikeways program provides a funding source for bicycle facility improvements which could be used for facilities on local roads. More information on MDOT's Bikeways program can be found at: [http://www.mdot.maryland.gov/newMDOT/Planning/Bike\\_Walk/Bikeways.html](http://www.mdot.maryland.gov/newMDOT/Planning/Bike_Walk/Bikeways.html)
- Please keep in mind that when roadway resurfacing is proposed, the town may want to consider adding marked bicycle lanes during a pavement project. This may be a quicker and lower cost option as opposed to constructing new pathways or sidewalks.
- Planning recommends that the transportation section include a map identifying existing and proposed bicycle and pedestrian routes, Priority Funding Areas, annexation areas and growth areas. This will provide readers a context of the transportation needs in relation to current and future growth areas.
- Major state highways are often the main street in small and medium-sized communities. This means they serve local, as well as regional travel. Freight and through traffic in these communities contribute to traffic congestion and have other adverse impacts on quality of life. Bypasses provide increased accessibility and generally increase development pressure around interchanges and along intersecting streets, particularly where sewer, water and other infrastructure services are provided. Has there been or will there be a study assessing the indirect effect of the proposed bypass on land use near the bypass, as well as the area between the town and the proposed bypass? How can citizens provide input regarding potential land use and related impacts?
- Considering MDOT's current budgetary constraints, the Town may want to consider the following questions: What can be done to alleviate congestion through town without construction of a bypass? What alternatives have been considered and why

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was a bypass determined to be the best solution? Have access management strategies been considered to restrict adjacent development along the proposed roadway?

- We encourage the Town to coordinate with Carroll County, the Maryland State Highway Administration and the Maryland Department of Planning to determine the best approach to address traffic congestion and meet the needs of the community while minimizing potential adverse land use and economic impacts.

**Chapter Ten - Mineral Resources Element**

Planning has no detailed comments regarding this chapter.

**Chapter Eleven - Areas of Critical State Concern Element**

Planning has no detailed comments regarding this chapter.

**Chapter Twelve - Water Resources Element**

- The Town of Manchester's draft comprehensive plan includes excellent analyses and recommendations to protect its water resources and to ensure that it has sufficient water and sewer to support its growth plans. The plan should serve the Town well as it moves forward with implementing its comprehensive plan.
- The Town incorporates the Carroll County Water Resources Element (WRE) by reference. The Town's draft comprehensive plan includes recommendations to ensure that Carroll County revise the county WRE and the county water/sewer plan to reflect the service areas, demand analyses and other data from the draft Town comprehensive plan.
- The Town adopted its Growth Tier Map on December 11, 2012. The Town should be aware that, per Section 3 of House Bill 409 of 2013 General Assembly, that the Growth Tier Map was to be incorporated into the Town's Comprehensive Plan by December 31, 2016. Since the Town has not incorporated the Growth Tier Map into its Comprehensive Plan, the Growth Tier Map is not considered adopted for purposes of §9-206 of the Environmental Article. The Town is strongly encouraged to amend its Growth Tier Map to reflect the revised Municipal Growth Area and sewer service areas mapped in the Town's draft Comprehensive Plan (as the draft Town comprehensive plan currently recommends) and to incorporate the amended Growth Tier Map into the Town's Comprehensive Plan.
- The Town might want to add more clarity regarding when public water and sewer can be provided to specific land use plan designations. For example, the descriptions for when public water and sewer can be provided within the General Business and Conservation land use plan areas provide general guidance but should provide additional examples or should include specific criteria to ensure the Town's vision for public water and sewer provision is as clear as possible. Also, the descriptions for the

Town of Manchester 2018 Comprehensive Plan Draft #1  
Maryland Department of Planning Comments

Low Density Residential and Local Business land use plan designations to do not provide guidance on when these areas should be served by public water and sewer.

**Chapter Thirteen - Implementation and Development Regulations Element**

- This chapter is where the plan really excels. Too often, implementation is a neglected part of the comprehensive planning process, so it was refreshing to read this chapter element and appreciate the optimism it reflects in the culmination of this effort. That said, the opening paragraphs could be strengthened by mentioning that the primary customer of the comprehensive plan are the citizens of Manchester.
- This element is particularly interesting because it does a good job of covering the length and breadth of the important parts of a successful implementation process, starting with the key objectives. The train analogy is a very clever and descriptive approach here, which affords the reader excitement about how the plan might be important to everyday life, as well as in the future. It is here that the plan really comes together full circle to rally around the one vision that rises above all others: Maintaining Manchester's small-town characteristics and appeal. The action items together form a solid foundation to ensure that happens, if it is adhered to.
- Page 97 Regarding Future Corporate Limits, the text states that guidance for annexation referencing state law include Article 66B. Please cite the pertinent section of the Land Use Article. The opportunity may be taken in this paragraph to mention the desire to eliminate by annexation the enclaves within the Town limits that are presently unincorporated.

END OF MARYLAND DEPARTMENT OF PLANNING COMMENTS

## 2018 Town of Manchester Comprehensive Plan State Agency Comments

**Maryland Department of Planning Review Comments  
April 20, 2018  
2018 Town of Manchester Comprehensive Plan**

## **STATE AGENCY COMMENTS**

The following pages contain comments from other State agencies in support of the Maryland Department of Planning (Planning) review of the 2018 Town of Manchester Comprehensive Plan Draft #1 as part of the standard 60-day review period. Comments not included here may be submitted under separate cover, or via the State Clearinghouse. If comments from other agencies are received by Planning, they will be forwarded to the County in a timely manner.

## Attachments

Page 2	Maryland Department of the Environment
Page 4	Maryland Department of Housing and Community Development (letter)
Page 6	Maryland Historical Trust (letter)

2018 Town of Manchester Comprehensive Plan  
State Agency Comments

MARYLAND DEPARTMENT OF THE ENVIRONMENT      Amanda Deegen 4/16/2018

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
5. Any contract specifying “lead paint abatement” must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.
6. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.
7. MDE notes the following:
  - A). Portions of the Draft Manchester Comp plan are not consistent with the 2017 DRAFT County Water and Sewer Plan;

2018 Town of Manchester Comprehensive Plan  
State Agency Comments

- B). Area O in the Comp Plan is not consistent with the Baltimore Reservoir Watershed Management Agreement; and
- C). Portions of the Comp Plan are in Tier II High Quality Waters and are in Anti-degradation areas.

MDE requests a meeting with the applicant. Please contact Janice Outen at [jance.outen@maryland.gov](mailto:jance.outen@maryland.gov)

Thank you

Amanda Deegen

Maryland Department of Housing and Community Development letter follows this page

Maryland Historical Trust letter follows this page



LARRY HOGAN  
*Governor*

BOYD K. RUTHERFORD  
*Lt. Governor*

KENNETH C. HOLT  
*Secretary*

TONY REED  
*Deputy Secretary*

March 30, 2018

Mr. Joseph Griffiths  
Manager of Local Assistance and Training  
Maryland Department of Planning  
301 West Preston Street, 11<sup>th</sup> floor  
Baltimore, MD 21201

Dear Mr. Griffiths:

Thank you for the opportunity to review the Town of Manchester Comprehensive Plan. The following comments are based on a review of the plan by staff in DHCD's Division of Neighborhood Revitalization:

- The Plan's goal of supporting in-fill development is consistent with the revitalization strategy of infill development under the Sustainable Communities program (pg. 13). The population cap articulated in the plan is consistent with the population cap of 5,000 in the Town's Sustainable Communities plan (pg. 11).
- In the Plan, the Town mentions that their older homes along Main Street, and the York Street & Park Avenue corridor are in need of some repair. This may present an opportunity for residential facade improvement through the Department's Community Legacy Program (pg. 19-20).
- The Plan includes mention of an enhanced revitalization program, although this mention is not specific. It would be helpful to understand what the Town's objectives are under the new program. Would the program focus be on façade improvement, streetscape improvements, or other elements? How would the enhanced revitalization program be implemented? (pg. 20).
- The Planning Nodes element (pg. 36) aligns well with the Sustainable Communities goal of focusing revitalization on specific geographical areas. Further, the Manchester plan directly discusses implementing the Town's Sustainable Communities plan (pg.39).



MARYLAND DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
2 N. Charles St. • Baltimore, MD 21201 • dhcd.maryland.gov  
410-509-5800 • 1-800-756-0119 • TTY/RELAY 711 or 1-800-735-2258



March 30, 2018

Page 2

- Creation of a Main Street revitalization program is discussed in the plan ( pg. 92). Manchester could look into joining the Main Street affiliate program. The Department may be able to provide resources to support the development of the new program, as well as a local facade or building improvement program.

Again, thank you for the opportunity to comment on the Town of Manchester Comprehensive Plan. If you have further questions regarding our comments, please call me at 410-209-5807. For specific questions regarding DHCD program resources to support implementation of the plan, please contact Ms. Sara Jackson, Project Coordinator at 410-209-5812 or via e-mail at [sara.jackson@maryland.gov](mailto:sara.jackson@maryland.gov).

Sincerely,



John Papagni  
Program Officer  
Division of Neighborhood Revitalization

April 6, 2018

Mr. Lawrence Burbank, Vice Chairperson  
Planning & Zoning Commission  
Town of Manchester  
3337 Victory Street  
Manchester, MD 21102

Dear Mr. Burbank:

Thank you for the opportunity to review the Town of Manchester's draft comprehensive plan and submit comments on behalf of the Maryland Historical Trust. Overall, we are pleased to see that the Town values its historic and cultural assets, particularly the downtown commercial area and surrounding agricultural lands, as essential to achieving the plan's central vision to "maintain Manchester's small-town character and appeal."

We support the identification of the historic Main Street area and York Street connections (including several historic structures) as "planning nodes" for future, more in-depth planning (p. 37-38), and we would be happy to provide technical assistance as you move forward. Additional comments on the draft comprehensive plan are outlined below.

p. 4 We recommend specifying, here (item 10) or elsewhere, that the Town's Main Street is not a designated Main Street per the Maryland Main Street program. The planning node discussion (p. 37) suggests that the Town should follow the Main Street approach for revitalization but does not include a recommendation to pursue designation. Official Main Street designation offers access to funding and technical support that could assist the Town's future efforts to revitalize the historic corridor. To learn more about eligibility for the program and the designation process, please visit <http://dhcd.maryland.gov/Communities/Pages/programs/MainStreet.aspx>.

p. 8 The plan mentions the importance of Manchester to the Heart of the Civil War Heritage Area; we recommend elaborating on this point, here or elsewhere in the plan, and explaining how Manchester fits in to the Heritage Area master plan and thematic interpretation. The Heart of the Civil War Heritage Area's management plan is available at <http://www.heartofthecivilwar.org/stakeholders/management-plan>.

To meet the statutory requirement that local jurisdictions must include, by reference, the approved Heritage Area Management Plan in comprehensive or master plans (Financial Institutions Article, Title 13, Subtitle 11, Annotated Code of Maryland, § 13-1111 (e)), we recommend that Manchester include the following language in the plan:

The Management Plan of the Heart of the Civil War Heritage Area (HCWHA) was adopted and made a part of the comprehensive plans of Carroll, Frederick and Washington counties in 2006 and included Manchester within the boundaries of the certified HCWHA Plan. The Town supports the efforts of the certification of the HCWHA Plan. This update of the comprehensive plan, when adopted by the Mayor and Town Council, incorporates by reference all portions of the Heart of the Civil War Heritage Area Management Plan, except those portions solely relating to other jurisdictions within the HCWHA, as part of the comprehensive plan.

p. 19 The description of the historic housing stock would be improved with a map. It appears that Manchester's historic downtown has been surveyed and the documentation is available in the Maryland Historical Trust's database (<https://mht.maryland.gov/secure/Medusa/PDF/Carroll/CARR-648.pdf>). As the Town engages in future planning efforts for the historic downtown – both commercial and residential – it may be useful to explore eligibility of specific properties or the district for listing in the National Register of Historic Places. National Register designation would help qualify those properties for financial incentives, including federal and state tax credits, that could support the Town's revitalization goals. For more information about the National Register, please contact Peter Kurtze at [peter.kurtze@maryland.gov](mailto:peter.kurtze@maryland.gov) or (410) 697-9562.

Thank you for the opportunity to comment on the Manchester draft comprehensive plan. If you have any questions, please contact me at [nell.ziehl@maryland.gov](mailto:nell.ziehl@maryland.gov) or (410) 697-9592.

Sincerely,



Nell Ziehl  
Chief, Office of Planning, Education and Outreach