



Maryland DEPARTMENT OF PLANNING

July 27, 2021

Robert Kundrick, Chairperson
Myersville Planning Commission
301 Main Street
P.O. Box 295
Myersville, MD
21773

Dear Mr. Kundrick,

Thank you for the opportunity to comment on the draft Town of Myersville Comprehensive Plan 2022-2042 (Draft Plan). The Maryland Department of Planning (Planning) believes that good planning is important for efficient and responsible development that adequately addresses resource protection, adequate public facilities, housing, community character, and economic development. Please keep in mind that Planning's attached review comments reflect the agency's thoughts on ways to strengthen the Draft Plan, as well as satisfy the requirements of Maryland's Land Use Article.

The Department forwarded a copy of the Draft Plan to several State agencies for review, including: the Maryland Historical Trust and the Departments of Transportation, Environment, Natural Resources, Commerce, Department of Disabilities, and Housing and Community Development. To date, we have received comments from the Maryland Historical Trust and the Department of the Environment, and these comments have been included with this letter. Any plan review comments received after the date of this letter will be forwarded 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 state agency comments as revisions are made to the Draft Plan, and to any future plans, ordinances, and policy documents that are developed.

Please feel free to contact me at (410) 767-4500 or Susan Llareus, Planning Supervisor and Regional Planner for the Maryland Capital Region, at susan.llareus@maryland.gov

Sincerely,

Charles W. Boyd, AICP
Director, Planning Coordination

Enclosures: Comments on the Draft Town of Myersville Comprehensive Plan: 2022-2042

cc: Mark Hinkle, Mayor – Town of Myersville
Kristin Aleshire, Town Manager – Town of Myersville
Brandon Boldyga, Planning and Zoning Administrator, Town of Myersville
Joseph Griffiths, Manager - Planning, Local Assistance and Training



**Maryland Department of Planning
Review Comments
July 2022
Town of Myersville Comprehensive Plan: 2022-2042**

The Maryland Department of Planning (Planning) has reviewed the draft of the Town of Myersville Comprehensive Plan 2022-2042 (Draft Plan) and offers the following comments for consideration. These comments are offered as suggestions to improve the Draft Plan and better address the statutory requirements of the Land Use Article. Other state agencies, as noted below, have also contributed comments. Still others may have comments submitted under separate cover. If comments from other agencies are subsequently received by Planning, they will be forwarded to the city in a timely manner.

Summary of the Draft Comprehensive Plan

The Draft Plan is an update to the currently adopted 2016 Town of Myersville Comprehensive Plan, adopted July 12, 2016. The transmittal letter from the town, dated May 31, 2022, states that the changes are as follows:

1. Include new goals for the town established within the Plan
2. Update land use data
3. Update zoning data including new Village Industrial (VI) zoning district
4. Update municipal growth element with latest figures and modifications to the growth boundary
5. Draft housing element to include identification of challenges and potential solutions
6. Modify implementation strategy to address changes made to the Plan
7. Update of all tables
8. Update of all maps

General Comments

The Draft Plan follows the layout and design of the adopted 2016 Town of Myersville Comprehensive Plan. It is well written and appears to be consistent with the Maryland State Visions and the Land Use Article, while providing the local community a solid plan for the future.

For general readability and as stated by Planning in its review of the draft 2016 comprehensive plan, "... the plan's overall readability would be enhanced by embedding the maps with the body of the text, instead of referencing the reader to the Appendix and then having a series of maps at the

back of the document.” (Comments March 28, 2016) This continues to be Planning’s suggestion in the review of this Draft Plan. Planning suggests that it would be helpful to the reader to incorporate the above list of changes into the introduction of the document.

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 indicates whether each required local plan element is addressed in the town’s Draft Plan.

Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans in Maryland			
State Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Myersville 2022-2042 Draft Plan references
(1) A comprehensive plan for a non-charter county or municipality MUST include:	L.U. § 3-102(a)		
(a) a community facilities element	L.U. § 3-102(a)(1)(i)	L.U. § 3-108 -- Community facilities element.	Section 8 Page 31
(b) an area of critical state concern element	L.U. § 3-102(a)(1)(ii)	L.U. § 3-109 -- Areas of critical State concern element	Not found
(c) a goals and objectives element	L.U. § 3-102(a)(1)(iii)	L.U. § 3-110 -- Goals and objectives element	Section 3 Page 7
(d) a housing element	L.U. § 3-102(a)(1)(iv)		Section 7 Page 28
(d) a land use element	L.U. § 3-102(a)(1)(v)	L.U. § 3-111 -- Land use element	Section 5 Page 17
(e) a development regulations element	L.U. § 3-102(a)(1)(vi)	L.U. § 3-103 -- Development regulations element	Not found
(f) a sensitive areas element	L.U. § 3-102(a)(1)(vii)	L.U. § 3-104 -- Sensitive areas element	Section 4 Page 8
(g) a transportation element	L.U. § 3-102(a)(1)(viii)	L.U. § 3-105 -- Transportation element	Section 9 Page 34
(h) a water resources element	L.U. § 3-102(a)(1)(ix)	L.U. § 3-106 -- Water resources element	Section 10 Page 41
(i) a mineral resources element, if current geological information is available	L.U. § 3-102(a)(2)	L.U. § 3-107 -- Mineral resources element	Not found
(j) for municipalities only, a municipal growth element	L.U. § 3-102(a)(3)	L.U. § 3-112 -- Municipal growth element	Section 6 Page 21

Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans in Maryland			
State Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Myersville 2022-2042 Draft Plan references
(k) for counties only if located on tidal waters, a fisheries element	L.U. § 3-102(a)(4)	L.U. § 3-113 -- Fisheries element	Not Applicable
Optional: (2) A comprehensive plan for a non-charter county or municipality MAY include: (a) a community renewal element; (b) a conservation element; (c) a flood control element; (d) a natural resources element; (e) a pollution control element; (f) information concerning the general location and extent of public utilities; and (f) a priority preservation area (PPA) element	L.U. § 3-102(b)	L.U. § 3-102(b)(2)(i)	
(3) Visions -- A local jurisdiction SHALL through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	L.U. § 3-201(c)	L.U. § 1-201 -- The 12 Planning Visions	Listed on pages 3-4 and noted throughout the document. See discussion below
Optional: (4) Growth Tiers -- If the local jurisdiction has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the jurisdiction's comprehensive plan	L.U. § 1-509		Myersville previously adopted a growth tier map. See discussion below

Further discussion is provided below relating to the required elements of a comprehensive plan under the subheading Conformance to Section 3-201(a) of the Land Use Article.

In addition to the requirements of § 3–201(a) and (b) of this article, a planning commission must also implement the Maryland State Visions through the comprehensive plan, as discussed in the subheading Maryland State Visions Section 3-201(c) of the Land Use Article. Finally, the plan must incorporate comprehensive plan growth tiers, if the jurisdiction adopted growth tiers in accordance with Section 1-502 of the Land Use Article.

Maryland State Visions Section 3-201(c) of the Land Use Article:

Maryland’s Planning Act of 1992, and subsequent legislation in 2000 and 2009, require that the Twelve Visions (12 Visions) of the State of Maryland be included and implemented through the comprehensive plan. Planning commends the town for incorporating the 12 visions into the plan and noting where in the document the 12 visions are reflected.

State Data Center Analysis - Community Profile:

[The Maryland State Data Center website](#) provides socioeconomic and demographic data for incorporated places such as [the historical American Community Survey \(ACS\) five-year data](#) which could be used for the Draft Plan. The Draft Plan is missing a presentation of current demographic characteristics or the change in these characteristics over time. Planning generally suggests that existing demographic

information include population, households, age, education, labor force, household income, home values, race, ethnicity, and gender. Expanding the information to include these demographics and identifying trends would provide a better sense of community composition, equity, and future needs.

- There is no discussion of commuting patterns or employment. There is brief mention of the current median household income (\$123,371) and median housing value (\$339,400) in Section 7, page 28. What jobs support those significant incomes? Where are those jobs located? Planning recommends the Census Bureau’s [OnTheMap](#) online application as a resource.
- Planning suggests a minor edit on page 5, ¶3, 4th sentence: “Frederick County is included within the Baltimore and Washington Metropolitan Statistical Areas, with a combined population of approximately 5 million persons.” Data from the 2020 Census shows that the Baltimore-Washington metro areas’ population is 5,095,615 or about 5.1 million.
- See page 5, ¶6. The parenthetical citation (10) refers to the Wolfsville-Myersville Area Historical Society (WMAHS). However, the population data discussed in the paragraph could not be retrieved from the Society’s website. Consider using the primary source: the U.S. Census Bureau.
- Data from the U.S. Census Bureau corresponds, mostly, to Table 4 as shown on page 23 of the Draft Plan. The 2020 population should be corrected to reflect the Census Bureau’s count of 1,748 persons. It is unclear how the 2022 population was estimated. The Census Bureau’s most recent municipal population estimates are for 2021.

Year	Population	Pop. Pct Change
1940	310	
1950	250	-19.4%
1960	355	42.0%
1970	450	26.8%
1980	432	-4.0%
1990	464	7.4%
2000	1,369	195.0%
2010	1,626	18.8%
2020	1,748	7.5%
2021	1,816	3.9%

Source: U.S. Census Bureau, Censuses 1940 to 2020

Source: Census, Population & Housing Unit Estimates, 2021

- See page 23 of the Draft Plan, Table 4. In addition to the town’s population count, the table also shows the count of housing units by decade. In verifying the counts, data for 2000, 2010, and 2020 do not match with the decennial Censuses. See comparison below:

	Comp Plan	Census 2020	Diff.
Year	HU	HU	HU
2000	450	453	3
2010	545	553	8
2020	603	590	-13

The most recent Census data is available from the Maryland State Data Center website:

<https://planning.maryland.gov/MSDC/Pages/census/censusdata.aspx>

- As shown above, there are minor differences between what is reported in the Draft Plan and what is published in the Census. Planning recommends that any errors should be corrected, or, if the housing unit data is based on the town’s building permits or other internal source this should be made clear.
- Annexations are planned on the north and south ends of the town; growth is also currently taking place on the town’s west side in the newer or pending residential subdivisions of Meadowridge Knoll (16 single-family dwelling units; 9 have already been constructed), Quail Run (80 single-family dwelling units and 30 townhomes), and Meadowridge Knoll Section II (5 single-family dwelling units) for a total of 131 additional dwelling units (including the 9 that have already been constructed) and 401 residents (this assumes 3.1 persons per dwelling unit). Table 5: Development Pipeline on page 24 indicates a total population growth of 373, although the text and calculation based on 3.1 persons per dwelling unit indicates a total increase in population of 401. If a different average household size was used to calculate the population for the townhome component of Quail Run, that should be made clear.
- Table 7: Total Projected Growth on page 26 indicates that between 2022 and 2042, population is projected to increase by 1,059; however, the calculation uses the 373 development pipeline/approved development number rather than the 401 number, based on Table 5 discussed above. Planning recommends that this be rectified or explained.
- For informational purposes only. When developing projections there are some established techniques. The state (Projections and State Data Center Unit) uses the cohort-component model to project for counties. The cohort-component model is not usable when projecting for towns since the needed data are rarely available for subcounty geographies. Alternatives include using an historical average population growth rate (preferably one based on the last ten or fifteen years); applying the county’s population growth rate (Frederick County’s population increased by 16.4 percent between 2010 and 2020); or calculating the projected population increase based on the Housing Unit Method. The Town of Myersville applies the Housing Unit Method.
- See page 25, Tables 7-8: The town assumes that population growth in Myersville is a function of the approved pipeline, infill development, annexation, and growth area development. Missing is a clear timeline for when units in each category above (except for the approved pipeline) would be delivered.
- If we assume that the town population would increase at the same rate as it has between 2010 and 2020, then by 2042, the town’s population would be 2,100 not 2,925. It would be wise to consider a

check on the projections shown on Table 8, whether that be through applying a different projection technique or considering— based on available evidence— how the national and regional economies might fare in the short term and long term and thus impact local economies.

- For informational purposes only. When the Projections and State Data Center conducts projections, it is over a 30-to-35-year horizon. Currently our projections are from 2015 to 2045 and we expect to update our projections for the 2020 to 2050 period. This projection horizon is also used by the state’s MPOs—the Baltimore Metropolitan Council (BMC) and the Washington Metropolitan Council (MWCOG). Frederick County is a member of the MWCOG.

Conformance to Section 3-201(a) of the Land Use Article

The following is an analysis of the submitted Draft Plan regarding the required elements, as stated in the Land Use Article for a local jurisdiction in accordance with Section 3-201(a)(1):

The planning commission for a local jurisdiction shall include in the comprehensive plan the following elements:

(i) a community facilities element;

The Draft Plan indicates on page 4 that “coordination with County planning efforts since much of the public facility planning is controlled at the County level. Coordination with Town plans will enable the County to attempt to provide public facilities sufficient to meet the needs of the citizens.” This is typical with many small towns. Goal 5 addresses adequate public facilities and Section 8: Public Facilities & Services addresses this required element of a comprehensive plan.

Schools- It appears the elementary, middle, and high schools will have capacity to accommodate projected population growth during the horizon of the Draft Plan. Planning notes that with the recent Covid-19 pandemic, new ways of instruction may change the way enrollment and capacity are calculated. Specifically, the traditional classroom layout and seating capacity may change due to social distancing requirements as set forth by the Center for Disease Control and new techniques for virtual learning. How long this epidemic will influence traditional school capacity and classroom seating is yet to be determined and may be changing for some time.

Public Safety, Fire and Emergency Services –The Draft Plan indicates that police and emergency services will be impacted moderately because of the projected increase in Myersville’s population by 2042. Over the horizon period, the town may want to monitor response times to ensure service remains adequate.

Library System - In 2019, Frederick County completed the construction of a new 7,500 square-foot library in the town, and it is anticipated this should meet the needs of the community well into the future.

Parks and Recreation

Existing Resources:

Page 17 notes the following: “Recreational land use covers 81.4 acres, or roughly 11.1% of the Town’s land area. Recreational land uses include active and passive park land within the Town. The Town along with one (1) of the HOA’s within the Town, own and maintain such parks and recreational properties within the Town. Recreational features within the Town include playgrounds, athletic fields, recreational pavilions, trails, “sitting” parks, and picnic areas.” Planning notes that resources near the town—the Appalachian Trail, Greenbrier State Park, and Doub’s Meadow Park—also provide recreation opportunities to residents.

Parks and Recreation in the Future:

Page 18 of the Draft Plan states: “The Plan assumes institutional and recreational uses will remain in place with little or no change to the existing land uses. All environmental conservation areas will remain as undeveloped uses; however, private land that is currently undeveloped [187.3 acres, 25.6% of the town’s land] is designated for either recreational, residential, commercial, industrial, or mixed land use development”.

Planning suggests that more specific information about the potential location and type of future park/recreation facilities would be helpful if there is an intended expansion of parkland because the Draft Plan and the Frederick County Land Preservation, Parks, and Recreation Plan indicate little if any additional land acquisition or park development in Myersville:

- Map 4 of Frederick County’s LPPRP (page 22) shows that the northwest section of Myersville lies outside a five-mile catchment area for a regional park. Map 11 on page 29, however, shows the entire town within a half mile of a non-regional park.
- Countywide proximity maps in Frederick County’s LPPRP show that Myersville also lies inside the 5-mile service areas for picnic facilities and water access.
- The Capital Improvement Plan in Frederick County’s LPPRP, pages 43-45, lists no specific projects or land acquisitions in Myersville. (However, countywide projects, such as the “replacement of aging park components” may include Myersville.)

Page 32 of the Draft Plan states that more recreational land is not needed for the projected 2042 population because Myersville will exceed “the State-adopted ratio for recreational space [of] 30 acres of recreational space for every 1,000 individuals.” However, the state no longer uses this standard, in part because it did not consider how far the acquired land was from the people who would use it. Land acquisition is now based on the Proximity and Park Equity Analysis, though the metric of 30-acres-per-1,000 residents may still be useful in a small jurisdiction such as Myersville. It appears that the park equity analysis tool indicates high park equity in the town and the surrounding area. <https://dnr.maryland.gov/pages/parkequity.aspx>

Nevertheless, Planning suggests that Myersville may want to revisit its recreation needs, not only because of future population growth but also because of the changing popularity of existing sports and the rise of new ones (e.g., pickleball), depending on community input.

The Myersville Open Space and Trails Master Plan:

The Draft Plan includes the Myersville Open Space & Trails Master Plan (Figure 8) on page 60, emphasizing the addition of new trails and sidewalks to improve connectivity to other existing trails and recreation sites. It clarifies the needs of pedestrians and could be expanded to include pathways for use by bicyclists in the community and influence a more active and healthier lifestyle for citizens.

To help implement the Myersville Open Space & Trails Master Plan (Figure 8), the town may want to consider requiring developers to provide trail or bikeway connections in the subdivision review and approval process. This consideration could be included as a transportation policy or action item in the Draft Plan. [The town’s Subdivision and Land Development Code](#) has required sidewalk and related facility improvements, but not for bicycle/trail facilities specifically. Requiring developers to help build hiker/biker trails would strengthen the town’s ability to provide and improve bicycle facilities, resulting in more active lifestyles in the community.

On Figure 8 - Myersville Open Space & Trails Master Plan, Planning suggests changing the legend categories to “Existing Asphalt Trails,” “Future Asphalt Trails,” “Existing Concrete Sidewalks,” and “Future Concrete Sidewalks” on the map to clarify these are trail or sidewalk facilities.

(ii) an area of critical State concern element;

The Draft Plan does not address or provide a list of the “Areas of Critical State Concern” as discussed within the A Better Maryland Plan. Here is a link to the website:

<https://abetter.maryland.gov/plan/pages/areas-of-critical-state-concern.aspx>.

A Better Maryland includes a list of state plans and programs that the town may want to identify as opportunities for collaboration between Maryland and its jurisdictions.

(iii) a goals and objectives element;

Section 3-110 of the Land Use Article states that the goals and objectives shall serve as guides for the development of economic and social well-being of the community. The Draft Plan includes the following seven goals, not substantially different from the adopted 2016 Town of Myersville Comprehensive Plan:

1. Preserve Myersville’s small-town character.
2. Preserve Myersville’s history and historical landmarks.
3. Preserve the Town’s water resources.
4. Protect environmentally sensitive areas.
5. Ensure the provision of adequate public facilities including public recreational facilities.
6. Implement “smart” and sustainable growth practices. The Town shall maintain Department of Housing and Community Development (DHCD) sustainable community designation to promote smart growth and sustainable development initiatives within Myersville.
7. Improve pedestrian connectivity within Myersville.

(iv) a housing element;

The Myersville housing element is discussed in Section 7 of the Draft Plan. It states the following relating to the number of dwelling units in the town: “The 2020 Census calculated a total of 603 housing units consisting of 527 single-family detached units, 45 townhouse units and 31 apartment units.” The Stata Data Center found that the 2020 census indicated 590 dwelling units and that the housing unit counts in the Myersville Comp Plan do not come from the release of decennial (or ten-year) Census counts. The Draft Plan’s housing unit counts do not come from the American Community Survey. Only the Census Bureau’s decennial Censuses should be used to report housing unit counts. Clarification is needed. Please contact Susan Llareus, Planning Supervisor and Regional Planner, if we can be of assistance with this issue.

The number of owner-occupied units in the town is 92.5% and the number of rental units is 7.5% per the ACS data for 2016-2020. The town may have better information if there have been conversions of multiplex units into single family detached units in the recent past.

The Draft Plan indicates that the median household income in Myersville is \$123,371, but the ACS data indicates \$125,625. [PLACE 2454875 ACS 2016-2020.pdf \(maryland.gov\)](#)

The passage of HB-1045 (2019) requires a housing element in all comprehensive plans adopted after June 1, 2020 and has certain requirements that have not been addressed in the Draft Plan. The new law requires a comprehensive plan to address the need for low-income and workforce housing, using the definitions contained in §3–114 of the Land Use Article and §4–1801 of the Housing and

Community Development Article. The bill defines low-income households based on 60% of the United States Department of Housing and Urban Development Area Median Income (HUD AMI) and 50% - 120% HUD AMI for workforce households.

To help jurisdictions with the new requirements, Planning has developed a Housing Element Models & Guidelines to address the recent legislation (HB 1045), which is contained within the [Maryland Department of Planning website](https://planning.maryland.gov/Pages/OurWork/housing-element-mg/housing-element-home.aspx) as a tool for local jurisdictions. (Here is the link: <https://planning.maryland.gov/Pages/OurWork/housing-element-mg/housing-element-home.aspx>) Recently the ACS data has been updated to include the 2016-2020 data.

County Area Median Income

2022 AMI for Myersville town [Washington-Arlington-Alexandria, DC-VA- MF HUD Metro] :	\$142,300
HB 1045 Household Income Levels/Ranges	
Workforce Ownership Range (60% - 120% AMI)	\$85,380 - \$170,760
Workforce Rental Range (50% - 120% AMI):	\$71,150 - \$170,760
Low Income (< 60% AMI):	\$85,380
Very Low Income (<50% AMI):	\$71,150
Affordable Homeowner/Rental Monthly Payments (Based on 30% of Household Income)	
Affordable Workforce Ownership Monthly Payment Range:	\$2,063 - \$4,127
Affordable Workforce Rental Monthly Payment Range:	\$1,719 - \$4,127
Affordable Low Income Monthly Payment:	\$2,063

Planning recommends that the Draft Plan’s housing element include a discussion of the new requirements of HB 1045, the required definitions contained in the legislation, and conduct a needs analysis based on the HUD AMI income and affordability thresholds in the table above. The town could analyze the affordable housing and workforce housing needs of its community by using the HUD AMI (regional) data provided on Planning’s Housing Element Models & Guidelines website including vacancy, housing type, decade of construction, housing types permitted by zoning district. The information is valuable and pertinent to the community and is based on the 2016-2020 ACS data. Also, the HB-1045 reports on the website relating to housing, demographics, social and economic characteristics of Myersville include a wealth of information.

As part of the State of Maryland’s efforts to define today’s housing issues, the Maryland Department of Housing and Community Development joined with the National Center for Smart Growth at the University of Maryland and Enterprise Community Partners, Inc. to develop [the Maryland Housing Needs Assessment & 10-Year Strategic Plan \(December 2020\)](#) (Needs Assessment). This document is intended to provide guidance to transform Maryland into a more affordable place to live by 2030 (page 1 of the Needs Assessment). In addition, the town can use this information for the needs analysis required by the legislation.

Section 2, Proposed Statewide Priorities on page 5 of the Needs Assessment suggests two types of priority needs for Myersville’s regional area: (1) homes for low-income households, especially extremely and very low-income households, and (2) constructing affordable and market-rate housing,

thereby increasing supply in the market. Priority populations were identified as two specific income groups with unmet needs, those households at 30 percent AMI and households at 60 percent AMI. In addition to these income groups, the Maryland Housing Needs Assessment Advisory Group also noted that a focus should be placed on housing for seniors, persons with disabilities, and persons experiencing homelessness (page 7 of the report). Planning suggests that the town focus on the aspects of the Needs Assessment most applicable to Myersville. As stated in the most recent Meyersville Sustainable Community Action Plan, there is a need for more diversity in the housing stock and affordable housing. Techniques such as the one used recently to incorporate townhouses into development could be continued and incentivized in the zoning ordinance or subdivision regulations.

The regional overview for the Washington, DC suburbs, in which Myersville is included, begins on page 41 of the Needs Assessment. Maps 3 and 4, pages 42 and 44 of the report respectively, classify Myersville as an area of “Moderate Need” for both homeowners and renters. Planning supports the two concepts of promoting Accessory Dwelling Units and a wider variety of housing types within future development proposals. Any additional increase in density for residential development will contribute to an increase in supply of housing units and is encouraged within the established growth area, where public facilities can support higher density. Planning also recommends that the town consider the priority actions for homeowners and renters in the Washington, DC suburbs that are expressed in the Needs Assessment. For the former, these include homebuyer assistance programs and expansion of the use of the Maryland Department of Housing and Community Development’s [Maryland Mortgage Program](#) financing. For the latter, this includes developing incentives for landlords and increasing available resources for accessibility improvements. For reference, the 2016-20120 ACS 5-Year Estimates for Myersville note that approximately only 7.5% of units in Myersville are renter occupied, of which 31.9% of the renter households are housing burdened (spend at least 30% of household income on housing). Approximately 92.5% of the households are owner occupied and 21.8% of those households are considered housing burdened. Regarding seniors in the community, approximately 18.8% of the households include seniors.

The housing vision for the State of Maryland looks for “A range of housing densities, types, and sizes provides residential options for citizens of all ages and incomes”. Since the ACS data indicates that a significant amount of renter and owner households in Myersville are housing burdened, Planning suggests that the Draft Plan be expanded to include a housing plan with more guidelines and specific strategies on how the town will address affordable housing for workforce, low-income, and senior residents in the future.

- Planning encourages the city to conduct a housing needs analysis, perhaps as an implementation measure of its housing element, to determine the true needs of its low-income and workforce households, and to set some goals and strategies relating to the following:
- Low-income and workforce housing with children and seniors;
- Identifying, protecting and preserving the existing supply of affordable housing;
- Consider inclusionary zoning to mandate a portion of a community as either workforce or affordable housing in the development of new construction and redevelopment opportunities; and
- Consider zoning adjustments and incentives to encourage a greater variety of housing types, such as increased density and missing middle housing products in the existing single-family neighborhoods.

(v) a land use element;

Section 3-111 of the Land Use Article states the following:

“On a schedule that extends as far into the future as is reasonable, the land use element shall propose the most appropriate and desirable patterns for the general location, character, extent, and interrelationship of the uses of public and private land.”

Section 3.4 - A Plan for Land Use indicates the horizon of the concepts within the Draft Plan to the year 2042. Land Use, Section 5 describes that there are seven land uses in the town, including residential (33.9%), undeveloped land (25.6%), recreational (11.1%), institutional (5.8%), commercial (3.2%), stormwater management (3%), and industrial (2.8%). Additionally, public rights-of-way comprise 14.5% of the land area within the town. A mixed-use land use category has been added to Figure 3: Myersville Comprehensive Land Use to address the potential co-location of commercial and residential land uses, by design, along Main Street/the town center.

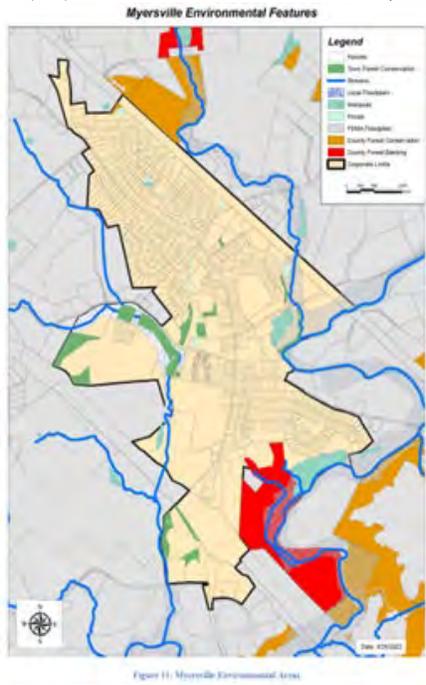
A comparison of existing land use (Figure 2) to planned use (Figure 3) below shows that the two largest areas of existing open space will become residential, mixed use, or commercial. Figure 3 shows land outside the current town limits but inside the growth area; none of it is proposed for recreational use (see land use maps on the next page). Some of the land in the southeast is shown as undeveloped in the future, but its location near an I-70 interchange may make it desirable for development. If cluster development is encouraged for new residential development, perhaps some of the land could be used for recreation, under the control of a homeowner’s association, and governed through covenants recorded with the final plat. This provides private local recreational facilities for the immediate community and reduces the costs, responsibilities, and liabilities of the municipality. This is particularly desirable for families with tots and pre-school age children and allows for exercise and social interaction in the outdoors, especially important considering the current pandemic.

The “Undeveloped” land use category on Figure 3: Myersville Comprehensive Land Use could contradict the underlining land use of the areas. Based on the information in the Draft Plan, Planning notes that these undeveloped areas seem to be either for Open Space or Environmental Conservation, where future development may not be feasible or called for. If this is the case, the town should change “Undeveloped” to a specific land use category (s) that the town desires.

(vi) a development regulations element;

Planning did not find any references to existing or future amendments to the municipal code that could be explored through the legislative process to implement the planning goal and objectives contained within the Draft Plan. Planning encourages the town to consider the concepts set forth for the horizon timetable of the Draft Plan and include ideas in the implementation section that could incentivize desired types of development or preservation, through amendments to the zoning ordinance and the subdivision regulations.

(vii) a sensitive areas element;



According to the Draft Plan, most environmentally sensitive areas have been zoned as Open Space (OS). The environmental policies and actions items listed in Section 11: Implementation are all appropriate and reasonable. We recommend that the Draft Plan elaborate on County Forest Conservation and Forest Conservation Banking, as shown on map Figure 11. The Draft Plan says that “on-site forest retention shall take priority over off-site mitigation measures” (page 49). Is Planning correct in assuming that “County Forest Conservation Areas” are where forest conservation requirements are met off site, and “Forest Conservation Banking” sites are future off-site tree-planting areas? (See map to the left)

Planning commends the town for seeking to “reforest or conserve existing forests on Town lands to the extent possible” (page 50). This action brings nature into the town, which provides for many health benefits to the environment as well as citizens. Planning also supports the partnership with the Maryland Department of Natural Resources that “planted approximately two (2) acres of land within the Little Catoclin Creek floodplain and within the wetland area in Doub’s Meadow Park” (page 48).

Planning also suggests that the town consider a policy toward implementing a tree canopy ordinance that would be applied at the time of new development proposals. Planning suggests striving for a 40 to 45 percent tree canopy goal for the urbanized and suburban/residential areas of town, consistent with the Metropolitan Washington Council of Government's Regional Tree Canopy Goals and Metrics, as presented to the Planning Directors Technical Advisory Committee on October 15, 2021. Areas devoid of tree canopy could be designated as the town’s highest priority for spending fee-in-lieu monies. Planning suggests a requirement for native shade tree planting on residential lots with more trees on large size lots. Also, for aesthetic reasons, the requirement of evergreen foundation planting at the base for the front façade of a dwelling adds to the street appeal. Street tree planting at the time of street construction plans and bonding of the plant materials is also appropriate. If the town does not have an inspector to enforce the approved plans, a third-party inspector can also be required to be paid for by the developer.

Another best practice is to require a certain amount of shade tree planting with any permit that disturbs more than 5,000 square feet. This practice has been used in both Prince George’s County and Montgomery County and has led to favorable outcomes in urban areas. The links to the current requirements for those jurisdictional regulations are provided below.

https://codelibrary.amlegal.com/codes/montgomerycounty/latest/montgomeryco_md_comcor/0-0-0-67737

https://library.municode.com/md/prince_george's_county/codes/code_of_ordinances?nodeId=PTIITI17PULOLAPRGECOMA_SUBTITLE_25TRVE_DIV3TRCACOOR

(viii) a transportation element; and

Planning is pleased to see the Draft Plan calls for implementing smart and sustainable growth practices and improving pedestrian connectivity as goals (page 7). The transportation policies and action items on pages 50 and 51 are aligned with these plan goals. It is also good to note that the

town is pursuing these policies and implementing action items in current practices. For example, Planning noted that the town improves sidewalks, crosswalks, and ADA accommodations when repairing and replacing local streets (pages 39 and 40). The state provides various funding and technical support programs to support local efforts to improve pedestrian and bicycle facilities. Here is the link to the website that features the Maryland Department of Transportation (MDOT)'s active transportation programs: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=24> .

In addition, please consider the Federal Highway Administration (FHWA)'s report on "[Small Town and Rural Multimodal Networks](#)," which provides best practice examples to enhance pedestrian and bicycle networks in rural communities and small towns.

[The Frederick County Bikeways & Trails Plan](#) proposes on-street bikeways on US 40 and multi-use trails and on-street bikeways on MD 17 in and through Myersville. The Town could consider incorporating these recommendations in the Myersville Open Space & Trails Master Plan (Figure 8).

Transit and Commuter Programs

Planning is pleased to see the Town supports transit options. On page 40, in the last paragraph, please add "seniors and" in the sentence as, "The TransIT bus service is provided for **seniors and** individuals with disabilities" (additions shown by **Bold**). [TransIT](#) provides service for both seniors and individuals with disabilities.

There are [multiple incentive programs](#) to support alternative transportation, e.g., transit, ridesharing, and telework/flexible work, for commuters in Maryland. These programs are available for Myersville residents. The Draft Plan should include the information on commuter choice programs.

Park & ride lots, high quality broadband, etc. are facilities that support commuter choice programs. It would be good to discuss the current park & ride lot usage by bus riders and commuters, which would help the town assess the need for improvements or expansion (if any) for commuters.

Is there a need for installing bicycle parking facilities at the park & ride lot? The town may want to assess the matter.

It would be helpful to discuss the potential merits of adding a TransIT bus service stop within the center of the town as the Transportation Action Item 3 (page 51) calls for. For examples, the benefits or merits may include those such as being situated close to where riders are, supporting businesses in the town center area, or easing walking or biking to the bus stop instead of driving to the current park & ride lot on the outskirts of the town. The information may help advocate for establishing such a stop at the town center.

Zero Emissions Vehicle (ZEV) Infrastructure

Increasingly, plug-in electric vehicles (EV) are gaining popularity in Maryland. As a "bedroom community" with a high percentage of commuters (page 28), the town may want to consider supportive policies and regulations to help build up EV infrastructure. For example, the town may consider [EV infrastructure building codes](#) for residential and commercial developments. In 2022, Frederick County passed [a building code requiring EV-readiness for certain residential developments](#). For more information on local EV resources including technical and financial assistance programs, please refer to the Maryland's EV website at https://marylandev.org/local_ev_resources/.

Roads

Planning well-connected roadway networks in undeveloped and potential growth areas will help guide future development and ensure efficient multimodal travel in and through the town. For example, the town could consider mapping future roadways to guide development areas on Figure 3: Myersville Comprehensive Land Use or Figure 7: Myersville Growth Boundary.

On page 27, please add “roads” in the sentence that describes the AFPO facilities coverage.

The Draft Plan mentions an increasing senior population in the future several times. To address the matter, the Draft Plan proposes to provide a senior center in the future (page 50) and discusses future transit needs for seniors (page 40). However, the information on population by age is not provided. As stated earlier, additional information relating to socioeconomic and demographic data should be included in the Draft Plan.

(ix) a water resources element.

Section 3-106 Water Resource Element (WRE), of the Land Use Article states the following:

- (a) In general. -- Considering available data provided by the Department of the Environment, the water resources element shall identify:
- (1) drinking water and other water resources that will be adequate for the needs of existing and future development proposed in the land use element of the plan; and
 - (2) suitable receiving waters and land areas to meet stormwater management and wastewater treatment and disposal needs of existing and future development proposed in the land use element of the plan.

Conscientious water and sewer planning began early in Myersville—in the town’s first comprehensive plan in 1966, the community set an objective to not extend water or sewerage service beyond the corporate limits. In the Draft Plan, there are seven goals, with the third and fourth goals pertaining to water resources as follows: “3. Preserve the Town’s water resources; 4. Protect environmentally sensitive areas.”

Planning commends the town for its focus on sustainable planning and protection of water resources in the Draft Plan. Planning also commends the town for including projected commercial growth in the Water Resources Element (WRE) water and sewer demand and capacity projections, which is often overlooked.

Planning suggests the following recommendations:

- Although Table 21: Water Allocation Analysis shows that the town has enough water supply to meet the projected demand, the town responsibly asserts that “[a]dditional water resources will be required between the years 2022 to 2042, as water demand increases” (page 44) because it recognizes that the calculations do not address the potential for severe drought or water source contamination. One way the town proposes to secure additional supply is requiring developers to “secure and supply 500 gpd for each new dwelling unit when developing new subdivisions” (page 44), which will help develop an emergency water surplus since the dwelling unit water consumption is only estimated at 250 gpd. The town also notes that it will continue conservation efforts and exploration of additional water supplies. Table 21: Water Allocation Analysis lists the “Projected Demand Increase” as 94,750 gpd, but the text on page 43 indicates “the Town should expect to increase the potable water supply by 98,000 gpd as a result of future development.” Planning recommends that this be rectified or explained.
- Page 44 indicates that the projected increase in future wastewater flow is 94,750 gpd, based on the projected increase in water demand of 94,750 gpd; however, the projected increased in water

demand described on page 43 is 98,000 gpd. Planning recommends that this be rectified or explained.

- In accordance with its MS4 phase II general permit, the town's restoration goal is approximately 15 acres, which it plans to accomplish through earning offset credits by planting over five acres of trees and connecting 23 existing septic systems to the town's sewer collection system, per the Maryland Department of the Environment's guidance document. Page 47 explains that the town is required to reduce its impervious cover to 20% by 2025 under this permit; but it would be helpful for readers to know what the current total impervious cover for the town is. Chapter 4, pages 62-67 of the following [watershed guide from the Maryland Department of Natural Resources](#) can be utilized as a resource to conduct an impervious cover analysis for both current impervious cover and future impervious cover.

The following recommendations are based on the [2022 Proposed Water Resources Element \(WRE\) Guidance Update](#).

- A checklist of best practices to identify and plan for suitable receiving waters is within the 2022 WRE Guidance at <https://planning.maryland.gov/Pages/OurWork/envr-planning/water-resources-mg/2022/02/framework-checklist.aspx>. The state requests that local governments meet the best practices in this WRE Guidance Update as best as they can within the limitations of cost and time. The town has addressed some of these elements in its WRE, such as identifying the assessment status of the streams in the Catoctin Creek watershed as impaired (page 41).
- All local jurisdictions in Maryland are and will continue to experience climate change impacts on water resources and water infrastructure (water, sewer, and stormwater)—for example, page 41 of the WRE recognizes that “climatic conditions impact ground water”—as well as water impacts on communities (e.g., flooding) due to climate change. At a minimum, Planning recommends that the WRE be adjusted to include strategies focused on improving local understanding of current or expected water-related climate change impacts at the local level, and if sufficient information exists, the WRE should add strategies to address these impacts. Best practices for integrating water-related climate change adaptation into the comprehensive plan are listed at <https://planning.maryland.gov/Pages/OurWork/envr-planning/water-resources-mg/2022/03/climatechange-checklist.aspx>. Planning commends the town for planning for the possibility of severe drought (see the town's strategy discussed in recommendation 3), which is an increasing threat due to climate change.
- If the land use changes in the town's comprehensive plan are planned in a watershed(s) prone to riverine or urban flooding, then the WRE should be adjusted to incorporate the flooding-related components of the Proposed 2022 WRE guidance. See <https://planning.maryland.gov/Pages/OurWork/envr-planning/water-resources-mg/2022/02/framework-cwa-wqfloodingmgmt.aspx>. At a minimum, the WRE should indicate the extent of current local knowledge concerning flood-prone areas and should discuss whether implementation of the land use plan will increase, decrease or have no effect on those flood-prone areas. If the local government does not know what type of impact implementation of the land use plan will have on flood-prone areas, then at a minimum, the WRE should call for a study to determine this.

(2) If current geological information is available, the plan shall include a mineral resources element.

The Draft Plan should address the above issue if current geological information is available.

(3) The plan for a municipal corporation that exercises zoning authority shall include a municipal growth element.

The Municipal Growth Element (MGE) is governed under [§3-112](#) of the Land Use Article. The section includes nine aspects that should be addressed in the MGE, making it a complicated comprehensive plan element. MGE Section 6 identifies annexation as key to the town's growth potential and includes a table of the 34 individual annexation resolutions that have been approved in the town since 1981. Myersville experienced a population boom in the 1990s, bringing the population from the hundreds up to 1,000; but growth since the 2008 recession has stabilized and the current estimated 2022 population is 1,866. The town expects additional growth due to statewide growth pressures and the trend toward small-town living.

As previously stated, future annexations are planned on the north and south ends of the town; growth is also currently taking place on the town's west side in the newer or pending residential subdivisions, and residential infill potential was analyzed using aerial imagery. Several properties were identified resulting in up to 64 additional dwelling units and an increase in population of 199.

The MGE notes that a majority of the town is located within a Priority Funding Area (PFA), and that the town is designated as a municipal growth area by Frederick County. Planning also notes that some of the areas within the municipal limits are designated as Heritage Areas in Locally Designated Growth Areas. However, it's not clear that the areas to be served by sewer will have a residential density of at least 3.5 units per acre to be designated a PFA. Planning suggests that the town consider these criteria when annexing properties and assigning municipal zoning.

The town growth area has been revised in the Draft Plan, as compared to the adopted 2016 Comprehensive Town growth area, to accommodate expansion since 2016 and potential natural preservation annexation areas. The 337.1 acre growth area could potentially expand the corporate limits from 731.4 acres to ultimately 1068.5 acres, and could result in development of an additional 157 dwelling units and an increase in population by 487 (page 25). The town wants the county to maintain the existing zoning for the potential annexation areas until annexation occurs to ensure that development in these areas will meet the town's objectives regarding development quality, open space, Smart Growth, water resource protection, Best Management Practices to protect water quality, appropriate expansion of water and sewer systems, and elimination of the potential for future failing septic systems. The town's population is projected to increase by 1,059 between 2022 and 2042.

The MGE also mentions that "Future commercial development will likely require additional water resources and sewer capacity to serve those developments."

The MGE concludes with a discussion of the critical importance of the town and county working collaboratively to address growth management issues, like water quality and quantity, for example.

The title of Table 7 on page 26 reads "Total Projected Growth". However, based on the contents of the Municipal Growth section description, it may be better described as residential development capacity of build out based upon current development, annexed areas, and the proposed growth area. Planning recommends that the Draft Plan compare its projected household growth with development capacity (not limited to residential). For MGEs, Planning recommends that jurisdictions project population and household growth using Census trends, such as a town's historic share of the county population or the growth rate between 2000 and 2020, for example. Following the development of those projections, an MGE should calculate the total capacity of available acreage within the town and the municipal growth area to determine if this acreage can accommodate the projected growth. If Myersville prefers to use the method in the Draft Plan, Planning recommends that the MGE include reasonable explanations why it

uses development capacity for the projected household growth rather than the method described above. Please refer to “[Models and Guidelines for Writing the Municipal Growth Element and Estimating Residential Development Capacity](#)” for further consideration.

Growth Tier Map

On 12/28/2012, Frederick County submitted its adopted growth tier map to Planning on behalf of Myersville, as authorized by the town on 12/6/2012. This action established a growth tier map for Myersville under SB236. As provided for in § 1–509 of the Land Use Article if the growth tier map is not incorporated into the comprehensive plan by the time the town conducts the 6-year review of the plan under § 1-416(a) or § 3-301(a) of the Land Use Article, the town’s map shall be considered not adopted for purposes of § 9–206 of the Environment Article. If the town intends for the growth tiers to remain adopted, Planning recommends the town either: (a) formally incorporate the county tier map into the comprehensive plan and ask the county to amend its tier map to reflect the town's revised growth boundaries; or (b) adopt its own tier map (updated to reflect the revised growth area) and formally incorporate it into the comprehensive plan. Planning generally recommends a Tier II designation for areas with county-planned sewer service and a Tier IIA designation for municipal growth areas planned for sewer service that are not yet in the county water/sewer plan.

If the comprehensive plan is revised to include a tier map, please provide Planning with a copy of the tier map after the plan is adopted so that Planning may complete a detailed review of the tier map under Section 1-505 of the Land Use Article. If requested, Planning can complete an informal review of the proposed tier map before the plan is adopted.

The Town of Myersville is a Sustainable Community

It should be noted that the Town of Myersville has a Sustainable Community Action Plan. As part of the Sustainable Community designation, quality of life, environment, economy, transportation, housing and local planning and land use are all subjects of the Action Plan. Planning notes that the Draft Plan is consistent with the Action Plan. The following is a link to the Town of Myersville Sustainable Community Action Plan:

[Myersville.pdf \(maryland.gov\)](#)

Please contact the Maryland Department of Housing and Community Development, Sustainable Communities Program for more information.

<https://dhcd.maryland.gov/Communities/Pages/dn/default.aspx>

Conclusion

Planning hopes the town finds the information contained in this letter helpful and offers to provide further assistance as the town prepares for the review and adoption of the Draft Plan. If this plan is approved with the modified MGE, please provide Planning updated GIS layers of the Growth Areas, as well as the future land uses.

**Maryland Department of Planning Review Comments
Town of Thurmont Master Plan: 2040**

STATE AGENCY COMMENTS

The following pages contain comments from other State agencies in support of the Maryland Department of Planning (Planning) review of the Town of Myersville Comprehensive Plan 2022-2042 (Draft Plan) as part of the standard 60-day review period for municipalities. 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 20: Maryland Historical Trust

Page 22: Maryland Department of the Environment



Susan Llareus -MDP- <susan.llareus@maryland.gov>

Fwd: Myersville Comprehensive Plan

Nell Ziehl -MDP- <nell.ziehl@maryland.gov>

Tue, Jun 28, 2022 at 1:30 PM

To: Susan Llareus -MDP- <susan.llareus@maryland.gov>

Cc: Rita Pritchett -MDP- <rita.pritchett@maryland.gov>, Joseph Griffiths -MDP- <joseph.griffiths@maryland.gov>

Hi Susan - I have reviewed the Myersville comp plan and do not have comments from the Maryland Historical Trust.

Please let me know if you have any questions or concerns.

Best,
Nell

----- Forwarded message -----

From: <joseph.griffiths@maryland.gov>

Date: Wed, Jun 1, 2022 at 3:20 PM

Subject: Myersville Comprehensive Plan

To: <steven.allan@maryland.gov>, <jesse.ash@maryland.gov>, <michael.bayer1@maryland.gov>, <ken.choi@maryland.gov>, <jason.dubow@maryland.gov>, <scott.hansen@maryland.gov>, <ellen.mussman@maryland.gov>, <daniel.rosen@maryland.gov>, <alfred.sundara@maryland.gov>, <deborah.sward@maryland.gov>, <bihui.xu@maryland.gov>, <nell.ziehl@maryland.gov>

Cc: <chuck.boyd@maryland.gov>, <joseph.griffiths@maryland.gov>, <rita.pritchett@maryland.gov>, <susan.llareus@maryland.gov>

TO: MDP Comprehensive Plan Reviewers

Town of Myersville has submitted their Myersville Comprehensive Plan on 6/1/2022 to MDP for review and comment.

Comments for this Plan are due to Susan Llareus by **6/28/2022**.

A digital copy of the Plan is available at https://apps.planning.maryland.gov/EMIRC_Files/MD20220601-0412.zip

Please forward your comments to Susan Llareus with a copy to Rita Pritchett by 6/28/2022. It is important that your Division notify Rita and Susan Llareus if comments will not be forwarded for this Plan so that our files will account for all responses requested.

No public hearing has been scheduled at this time.

Thanks,

Joseph Griffiths
Manager of Local Assistance and Training
Maryland Department of Planning
410-767-4553
Please take our customer service survey.

--

Nell Ziehl
Chief, Office of Planning, Education and Outreach
Maryland Historical Trust
Maryland Department of Planning
(410) 697-9592
she, her, hers

mht.maryland.gov
Planning.Maryland.gov

Please take our customer service survey.





Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

July 22, 2022

Mr. Charles Boyd
Maryland Department of Planning
301 West Preston Street
Suite 1101
Baltimore, MD 21201

RE: Local Plan Review
Town of Myersville Comprehensive Plan- Draft
MD20160210-0091

Dear Mr, Boyd,

Below are the comments from the Maryland Department of the Environment regarding the above referenced project. Our response code is R2.

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 and Materials 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 Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Solid Waste Program should be contacted directly at (410) 537-3315 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 1978 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 Land Restoration Program at (410) 537-3437.
7. The project may cause contaminated runoff from an animal feeding operation (AFO). Please contact the AFO Division at (410) 537-4423 to determine if this AFO will require registration under the General Discharge Permit for Animal Feeding Operations.

Please let me know if you have any questions or concerns.

Sincerely,

Amanda R. Redmiles

Amanda R. Redmiles
Interdepartmental Information Liaison
Maryland Department of the Environment

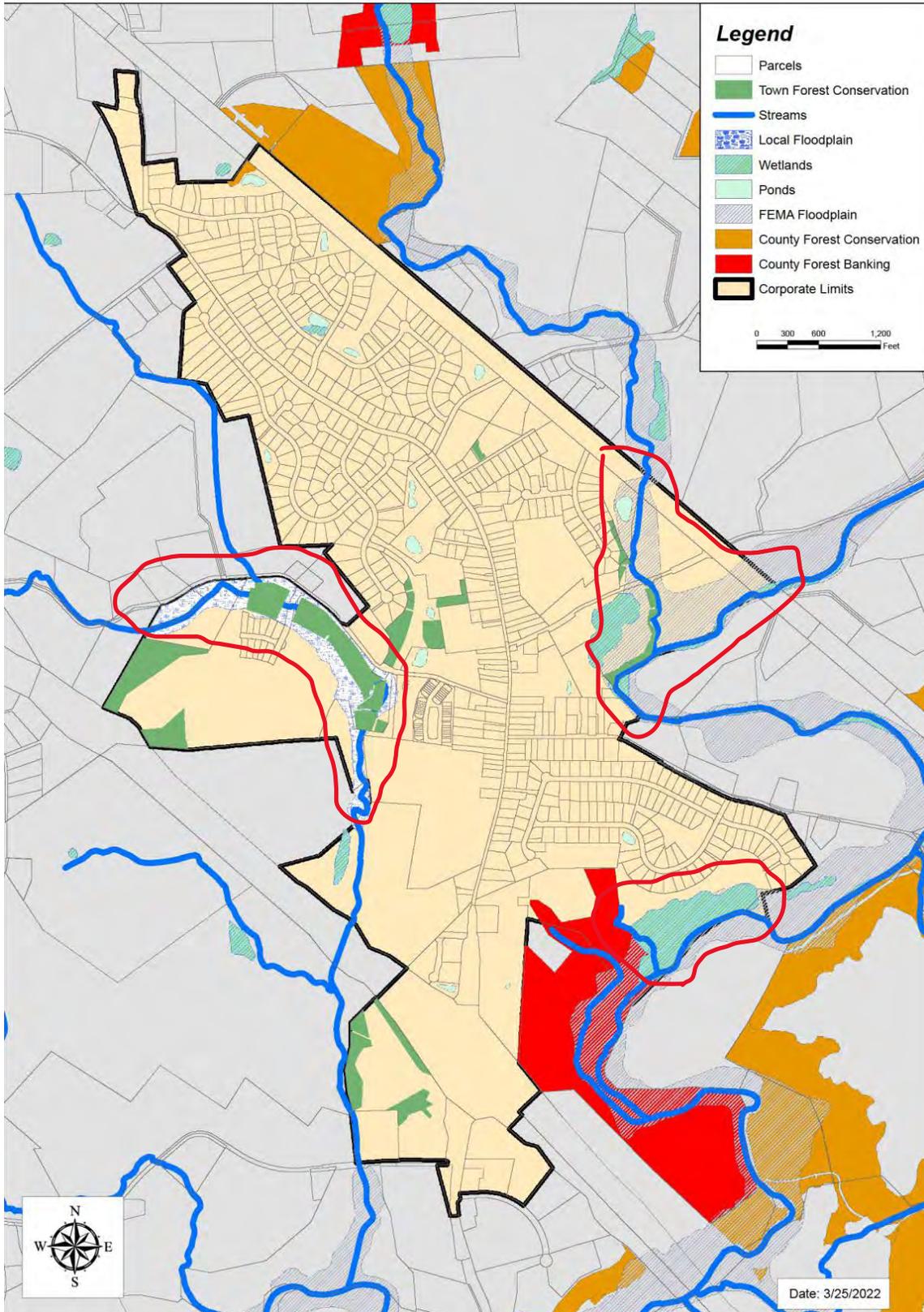
Enclosures:

Myersville 2022 Comprehensive Plan MDE-WSA Comments
Myersville 2022 Comprehensive Plan MDE-WSA-WPRPP Comments

Location	MDE Comment
Page 28, last paragraph	Concur that coordination with the County, specifically in TMDL areas and for protecting water supply, is important. Myersville should consider identifying approaches for doing so in the implementation section.
Page 32, first paragraph	The numbers cited in this paragraph don't match the numbers in Tables 10 and 11 below.
Page 33, second paragraph, second to last sentence	Should be ratio instead of "ration"
Page 41, 3 rd paragraph	<p>Recommend discussing the designated use (3-P) of the Catoctin Cr. watershed for both coldwater fisheries and drinking water supply. This entails consideration of temperature impacts and with new development and prioritizing best management practices to limit thermal changes with new development. Limiting or reducing impervious surfaces with new development can also help with both thermal impacts and promoting stormwater infiltration and treatment that will help protect the drinking water use, See other recommended thermal protection stormwater BMPs for coldwater streams -</p> <p>https://mde.maryland.gov/programs/water/StormwaterManagementProgram/Documents/www.mde.state.md.us/assets/document/chapter4.pdf</p>
Page 43, 3 rd paragraph	<p>This is about equivalent to the future projected water demand. Suggests that the 345 new dwelling units will represent a growth limit based upon currently available water resources. For now, the town has sufficient water supply to meet existing needs and into the near future based upon the likely pace of new development. As you proceed closer to full build out of your proposed development, please consult with MDE so we can work with you. We understand you have fairly robust water yield monitoring in place which we can evaluate with you to determine actual water yield relative to your current allocation. Again, MDE's Water Supply program will work with you in the future and through future water allocation permitting cycles to ensure you have adequate water supply for planned development.</p>
Page 45, first sentence	<p>Additional water and sewer capacity will be required between 2022 and 2042. Water and sewer plans should consider this in light of new sources or capacity. At build out will be at 87% of wastewater capacity and 96% of DW capacity. Recommend early coordination with MDE's Water Supply and Wastewater Programs to ensure adequate capacity for future development/annexation.</p>
Page 45, Wastewater Recovery Paragraph	<p>Please reach out to MDE's Water Quality Finance Administration for possible financing assistance. See https://mde.maryland.gov/programs/water/WQFA/Pages/index.aspx</p>
Page 48, 1 st paragraph	<p>Flood prone or vulnerable areas of the town should be considered in the stormwater discussion. Identification of flood prone areas can provide a way to target MS4 retrofits while also reducing local flood impacts.</p>

Page 48, 3 rd paragraph	There is no mention of a 100' buffer requirement in section 4 regarding streams and wetlands. Is there a Town ordinance requiring or is it policy? Please clarify.
Page 49, Env. Policy Section	How do the future proposed developments intersect with these policy statements? For example, are some of the proposed developments within the 100-year flood plain, on steep slopes, or along streams or wetlands where buffer encroachment could occur? Providing such an analysis could help identify specific opportunities to implement the env policy goals in order to better protect water quality with new development.
Page 49, Env. Policy item 1.	Are the buffers required to be 100' per buffer requirements language on page 48?
Page 49, Env. Policy item 3.	Also recommend reducing impervious surfaces associated with new development, See other recommended thermal protection stormwater BMPs for coldwater streams - https://mde.maryland.gov/programs/water/StormwaterManagementProgram/Documents/www.mde.state.md.us/assets/document/chapter4.pdf
Page 50, Water Resources Policy item 2.	ESD is already part of MD's stormwater requirements and thus already encouraged. Does the Town propose in certain circumstances to require greater stormwater infiltration with new development than required under MD's stormwater design manual ? Please clarify.
Page 63 figure	Recommend that open space or env. protection zoning in the local and FEMA floodplains be considered to minimize flood risk and vulnerability with new development. These could coincide with the 100 foot buffer areas around streams and wetlands. See red circles (figure below) as examples of areas that could be considered for open space or forest/wetland conservation zoning designation.

Myersville Environmental Features



Town Of Myersville Comprehensive Plan 2022-2042

Maryland Department of the Environment – WSA/WPRPP

REVIEW FINDING: R2 Contingent Upon Certain Actions
(MD2022 0601-0412)

The Town Of Myersville Comprehensive Plan 2022-2042 provides drinking water and wastewater current demands, projected demands, capacities and service maps. There are differences in the Town's Service maps found on Figure 13 (Water Service), Figure 14 (Sewer Service) and the Frederick County service areas for the Town. The Town is encouraged to work with the County to resolve any differences. Please see the Figures from the Comprehensive Plan and from the Frederick County website.

Myersville Water Service Map

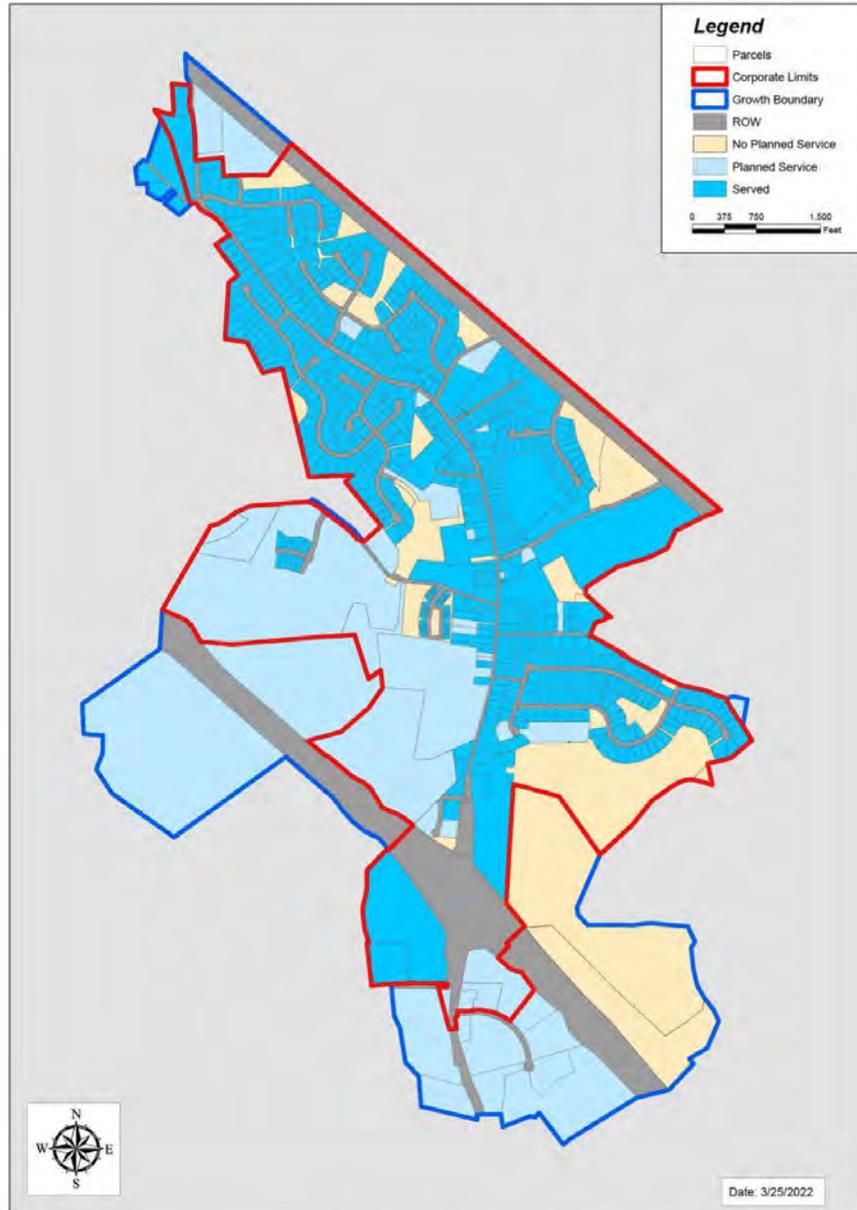


Figure 13: Myersville Water Service Map



Myersville Water Service



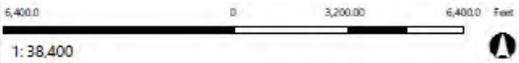
Frederick County Water Service Area

- W-1
- W-2
- W-3
- W-4
- W-5
- ▨ Multi-Use
- Existing Reservoir
- Planned Reservoir
- Planned Service
- No Planned Service

Frederick City Water Service Area

- W-1
- W-2
- W-3
- W-4
- W-5
- ▨ Multi-Use
- Existing Reservoir
- Planned Reservoir
- Planned Service
- No Planned Service

- Fire Stations
- Golf Courses
- Libraries
- MARC Rail Stations
- Police
- Post Office
- Frederick County Boundary
- Surrounding Counties
- -all other values
- Maryland



6/24/2022
 NAD_1983_StatePlane_Maryland_FIPS_1600_Feet

While efforts have been made to ensure the accuracy of this map, Frederick County accepts no liability or responsibility for errors, omissions, or positional inaccuracies in the context of this map. Reliance on this map is at the risk of the user. This map is for illustrative purposes only and should not be used for surveying, engineering, or site-specific analysis.

Myersville Sewer Service Map

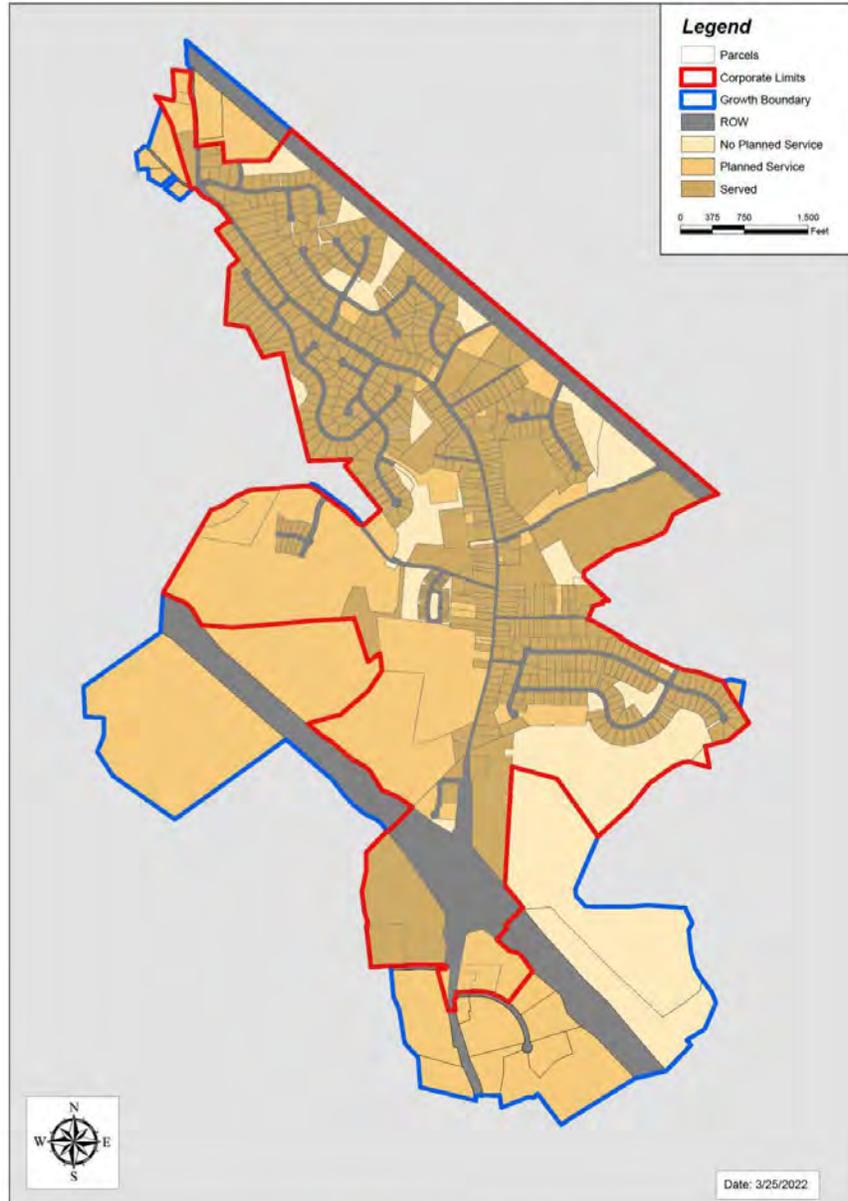
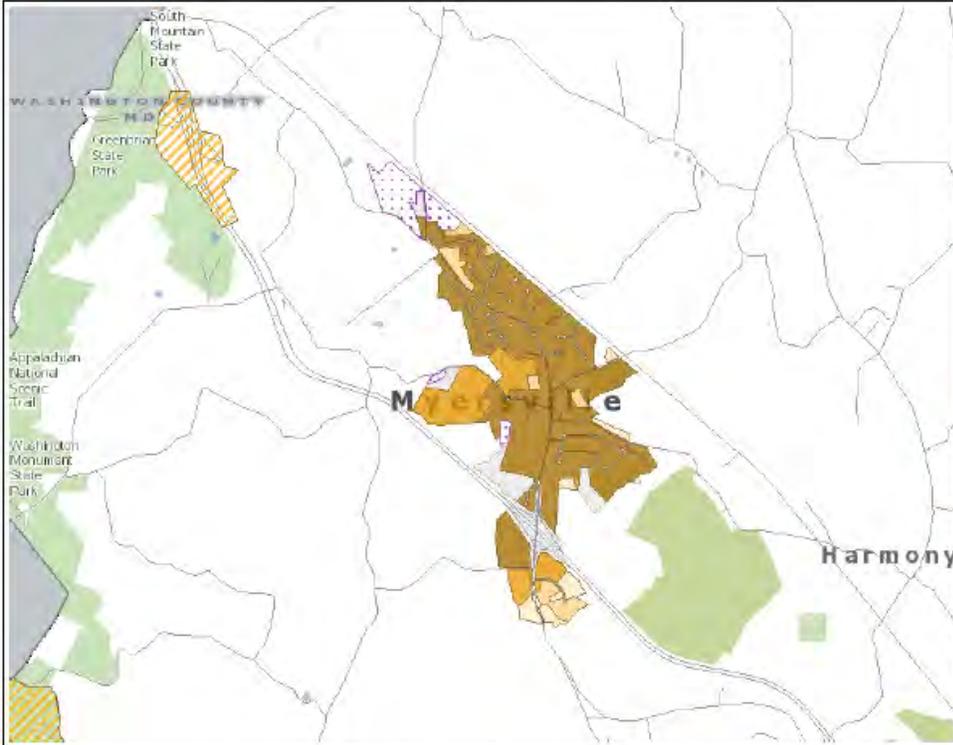


Figure 14: Myersville Sewer Service Map



Myersville Sewer Service



Frederick County Sewer Service Area

- S-1
- S-2
- S-3
- S-4
- S-5
- Multi-Line
- Planned Service
- No Planned Service

Frederick City Sewer Service Area

- S-1
- S-2
- S-3
- S-4
- S-5
- Multi-Line
- Planned Service
- No Planned Service

- + Fire Stations
- + Golf Courses
- + Libraries
- + MARC Rail Stations
- + Police
- + Post Office
- Frederick County Boundary
- Surrounding Counties
- Maryland

6,400.0 0 3,200.00 6,400.0 Feet

1: 38,400



6/26/2022

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