



Maryland Department of Planning

Sustainable _____ Attainable

Philip Hager, Director
Carroll County Land Use, Planning, and Development
225 North Center St.
Westminster, Maryland 21157

October 7, 2014

Re: MDP Review of 2014 Draft Carroll County Master Plan

Dear Mr. Hager: *Phil*

The Maryland Department of Planning (MDP) appreciates the opportunity to review the draft 2014 Master Plan for Carroll County. The Master Plan is important for efficient and responsible development that adequately addresses resource protection, adequate public facilities, community character, and economic development. MDP recognizes the benefits of several of the plan's components such as 1) commitment to agricultural preservation, 2) several recommendations and implementation strategies in the Transportation Chapter, 3) intent to target growth to Designated Growth Areas (DGAs). These efforts will have a positive impact on the County's future.

However, MDP and other State agencies have concerns with several aspects of the plan. The Master Plan was forwarded to the Departments of Transportation, Environment, Natural Resources, Business and Economic Development, Housing and Community Development, and Agriculture. To date, comments have been received from the Department of Transportation, Environment, and Natural Resources. In addition, the Maryland Historical Trust submitted comments via separate letter. These comments are provided as an attachment. Additional comments received from State agencies will be forwarded upon receipt.

Highlights of MDP and State agency concerns include:

- Statements in the Plan purport that the master plan is merely advisory. However, consistency of the plan with implementing ordinances, including but not limited to the local zoning ordinance, subdivision regulations, and water and sewer plan is codified in law and is required.
- The locally elected legislative body has inserted language in the plan representing their principles, visions and implementation strategies. The Master Plan is a long range planning document meant to guide the County throughout the horizon of the plan. The Planning and Zoning Commission should review the Maryland Annotated Land Use Article § 3-201 to § 3-205 regarding the roles and functions of the planning commission in contrast to the local legislative body.
- The County's Designated Growth Areas (DGAs) are a critical part of the County's long term future planning; however these areas are not included in the draft Plan. While it is understood that these areas are part of small area master plans, it is difficult to get a complete picture of the Plan using this format. The relationship between the County's Master Plan and small area plans should be clearly articulated.

Martin O'Malley, Governor
Anthony G. Brown, Lt. Governor

Richard Eberhart Hall, AICP, Secretary
Amanda Stakem Conn, Esq., Deputy Secretary

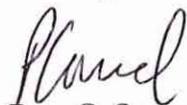
October 7, 2014, Page 2 of 2
Mr. Philip Hager, Director
Re: Review of 2014 Draft Carroll County Master Plan

- The Plan recommends 29 major highway improvement projects for various segments of state highways, including the Manchester Bypass. Many of these projects are outside the County's Priority Funding Areas (PFA). All major state transportation projects are required to be consistent with the State's planning policy and comply with the PFA law.
- One of the Plan's transportation goals makes mention of providing a safe and functional transportation system, but only on an intra-county basis. It is recommended that the County address this need for neighboring communities and regional destinations. This should include transit services and partnering with other regional transit providers.
- The Reservoir Watershed Agreement of 2005, to which Carroll County is a signatory, pertains to land use decisions. This agreement is not discussed as it relates to water resources and land use changes. Several land use changes are proposed in the reservoir area- replacing Conservation land uses with Very Low Density Residential land uses, removing the Agriculture land use within Rural Villages and introducing new areas of Heavy Industrial. These changes may impact the water quality of the reservoir.
- The Plan shows several heavy-industrial areas near agricultural easements or in or near the Priority Preservation Area (PPA)/Rural Legacy Areas (RLA). If these areas are not existing industrial uses, their designation in close proximity to the PPA and RLA should be addressed.
- The definitions of several land use categories do not provide adequate information to determine the impact of the land use, specifically Conservation, Reservoir, and Rural Village.
- The implementation strategies are currently located in Appendix A of the Plan. Implementation strategies are arguably one of the most important parts of the Plan and should be incorporated into each relevant chapter.

Please keep in mind that the attached comments reflect the State's thoughts on ways to strengthen the County's Master Plan, as well as to clearly depict the County's Future Land Use Plan. We hope Carroll County considers our comments as revisions are made to the draft Plan, and to any future plans, ordinances, and policy documents that are developed.

Please contact me at (410) 767-4553 or Melissa Appler at (410) 767-4468.

Sincerely,



Peter G. Conrad, AICP
Director, Local Planning Assistance

Attachments

Cc: Alec Yeo, Chairman, Carroll County Planning Commission
Secretary Richard E. Hall, MDP
Rich Josephson, MDP
Virginia Kearney, MDE

**Maryland Department of Planning
Review Comments October 7, 2014
Draft 2014 Carroll County Comprehensive Plan**

General Comments

- The Maryland Department of Planning commends Carroll County on the inclusion of a review of the existing state planning enabling law and the incorporation of the twelve state planning visions within the 2014 Master Plan.
- There are statements in the Plan that suggest that the comprehensive plan is merely advisory. However, State law requires that, in implementing the Plan through the local zoning ordinance, subdivision regulations, variances, water and sewer plans, and other land use regulations, that such implementation efforts be “consistent with” and “not contrary to” the Plan. Land Use Article §§ 1-303, 3-303.
- The Maryland Department of Planning encourages the Carroll County Planning and Zoning Commission to review the Land Use Article §§ 3-201-205 regarding the respective responsibilities, roles and functions of the planning commission and the local legislative body. The Plan includes several statements, including, principles, visions, and implementation strategies that have been inserted by the locally elected legislative body. Furthermore, the Comprehensive Plan is a long range planning document to guide the County throughout the horizon of the plan.

In previous community plans adopted by the Carroll County Board of Commissioners; a section is included regarding “Planning Commission Responsibility.” This section states,

One of the most significant responsibilities that the Planning Commission is given is the authority to develop the county or town’s comprehensive plan. Upon completion of a final draft acceptable to the Commission, the members will vote to approve the Plan and will forward it to the elected officials with a recommendation for adoption. The elected officials have the authority to accept or reject this recommendation. While the elected officials cannot make revisions to the Plan themselves, they may send it back to the Planning Commission... (Westminster Environ and Hampstead Community Plan)

- It is encouraging to read of the County’s intentions to target future growth to the County’s Designated Growth Areas (DGAs). The designated growth areas are a critical part of the county in terms of planning for future growth and development, and they are referenced throughout the plan. However, very little detail on what exists and is planned for those areas is provided in the Plan. While MDP understands that the County will complete small area master plans, it is difficult to get a complete picture of the Plan using this format. Furthermore, the County’s Master Plan should articulate the relationship between the Master Plan and any subsequent small area plans. At a minimum, the small area plans should follow a similar format as the Plan and the future land use classification system should be consistent across the small area plans.
- The Plan’s structure is accessible to the reader with the inclusion of goals, challenges, choices and fiscal impact into each chapter; however the reader would greatly benefit from the incorporation of the implementation strategies found in Appendix A into each relevant chapter. Implementation

strategies are arguably one of the most important parts of the plan. While it may be helpful to list all implementation strategies in an “index”, they should be inserted into relevant chapters in the plan.

Additionally, the generalized nature of the Policies and Recommendations within each chapter may leave readers of the Master Plan confused as to how the Plan will be executed. As stated in the plans Foreword, “...the most important portion of most Plans are the goals, recommendations and implementation efforts.” The incorporation of relevant sections of Appendix A into each chapter will provide readers of the Master Plan a clear vision of what measures the County intends to take in implementing the noted policies and recommendations and overcoming identified challenges.

Chapter 1: Concepts and Intentions

- On page 1, County’s Designated Growth Areas (DGA) and Growth Area Boundary (GAB) are defined.
 - It would be helpful if a map were included or referenced in this discussion showing the extent of both the DGA and GAB boundaries.
 - A discussion of the GAB or future annexation areas may also be beneficial to readers; how they are developed, relationship to the municipal plans etc..

- The Carroll County Commissioner’s environmental principles, vision statement, goals and implementation methods are stated on page 2 of the plan. What is the relationship between these principles and those stated in Chapter 3: Vision Statement & Goals? It appears that those in Chapter 3 have been established through a public participation process.

- The Carroll County Commissioner’s visions for both free enterprise and environmental protection are commendable (page 2). However, the intent of the third bullet point is unclear:

The Board of County Commissioners believes an economy based on free-market principles produces innovative technologies and solutions that can conserve natural resources and promote environmental quality.

Innovative business practices and green development can mitigate environmental damage and reduce the consumption of resources; however mitigation strategies do differ from those used in resource conservation. For example, cluster subdivisions use less land, but they are nonetheless a form of development. Conservation is achieved by placing the land under a preservation easement and not developing it at all. Similarly, reducing the damage to water quality is not the same thing as protecting water quality.

- Please clarify the statement below; specifically what state mandates are being implied and how such “State mandates” penalize urban and suburban regions.

...it is becoming increasingly difficult to promote housing choices desired by County residents and prospective residents in the diversity and desired locations due to new state mandates, spending priorities and other directives that are designed to penalize urban and suburban regions of the state.

- The statement on page 3, related to “Priority Funding Areas” is not entirely accurate. The Plan states that “The State is prohibited from funding growth-related projects located outside of PFAs unless there is a need to address health and safety issues.” A process for reviewing projects that are not within PFAs has been established as required by “The Smart Growth and Neighborhood Conservation- Smart Growth Areas Law”. These exceptions or extraordinary circumstances can include various types of projects, not only those related to health and safety. For more information on PFA exceptions and extraordinary circumstances please visit the MDP website at:

<http://www.mdp.state.md.us/OurWork/1997PFAAct.shtml>

- On page 8, the Plan states “*that DGAs are Carroll County’s equivalent to PFAs.*” The County’s DGAs do not match the state’s PFA areas. The DGAs are larger than the County PFA areas. Please provide clarifying language in this section. A map showing the differences between the two boundaries would be helpful to readers.
- Pages 8-10, Meeting the Twelve Visions
 - The Plan states that subway stations and /or government sponsored or subsidized inter-county bus services are not considered priorities. Please consider the impact of limiting the county’s transportation options on accomplishing other stated visions and goals related to housing and economic development presented within the draft plan.
 - Page 9 of the Plan established a goal of increasing the commercial and industrial tax base from 10 percent to a minimum of 12 percent as new development occurs. However, page 114 in Chapter 15 Employment/Economic Development states that the existing tax base of commercial and industrial development is currently 12 percent.
 - The County may want to highlight the land preservation program in this section as it relates to “Meeting the Twelve Visions” (pages 8-10).

Chapter 3: Visions Statements & Goals

- The Plan’s transportation goal is to “provide a safe and functional intra-county transportation system that promotes access and mobility for people and goods through a variety of modes”. MDP encourages the County to consider the limitations this goal may present on achieving other stated goals within the plan, such as; encouraging a range of housing types, densities and affordability and promoting a healthy economy and additional employment opportunities. It may be difficult to accomplish these goals without consideration of the inter-county transportation system as well as alternate modes of transportation.
- The discussion on page 23 that defines “Policies” and “Recommendations” would also benefit from the inclusion of the corresponding “Implementation Strategies” which are found in Appendix A.

Chapter 4: Past, Present, & Future Trends

- The paragraph on agriculture refers to the Census of Agriculture of 2007 as the most recent. The results of the 2012 Agriculture Census are now available; this section should be updated accordingly. The 2012 census is cited on page 67 of the plan.
- In paragraph 2 under “Population”, the percent increase in population for Carroll County between 1840 and 1960 is calculated incorrectly (page 24)
- When referencing countywide build-out, does this number include municipal capacity? (page 27)
- In the last sentence in the “Agriculture” section, the plan references a potential septic law. This needs to be updated to reflect the passage of SB 236, “The Sustainable Growth and Agriculture Preservation Act of 2012” (page 28).
- The Plan would benefit from a more in-depth discussion of the aging population and related planning and service needs.

Chapter 5: Water Resources

The following comments are related to the consistency of the draft Carroll County 2014 Master Plan with the adopted Carroll County Water Resources Element (WRE):

- Given the Master Plan's changes in land use designations and DGAs, the Carroll County 2014 Master Plan should indicate whether or not the forecasts of water and sewer demand and non-point source pollution in the Carroll County WRE are adequate representations of the water resource impacts expected from implementation of the Carroll County 2014 Master Plan.
- The Carroll County 2014 Master Plan should indicate whether or not the solutions to address water resource needs listed in the Carroll County WRE will be adequate to support implementation of the Carroll County 2014 Master Plan.

Chapter 6: Public Facilities & Services

Schools

- It would be helpful if the discussion of schools on page 39 included a map of school boundaries, the location of existing schools as well as any future planned schools. It would also be useful if the Plan included tables indicating the schools' current and seven (7) year projected enrollment and school facility capacity data. This information could be used as another tool to assure that collaboration with the local educational agency continues.

Water & Sewer

- The Plan states (page 42) "The Water and Sewer Master Plan enables the County and its municipalities to delineate water and sewer service areas and budget appropriations for improvements as needed to serve the planned service areas." The designation of areas to be served by water and sewer is done in the comprehensive plan. The water and sewer plan is a functional plan that implements the recommendation of the comprehensive plan. As noted in Title 26, Department of the Environment, Subtitle 03, Chapter 1, "It is the intent of these regulations to require the governing body of each county and Baltimore City to develop water supply and sewerage systems so as to be consistent with county comprehensive planning." We recommend that the text on page 42 be revised to read: "The Water and Sewer Master Plan enables the County and its municipalities to provide service to the planned service areas designated in their comprehensive plan."

Chapter 7: Transportation

- The Plan's Transportation Goal states: "Provide a safe and functional intra-county transportation system that promotes access and mobility for people and goods through a variety of transportation modes." MDP strongly encourages the County to address transit as one of the transportation modes that provides transportation accessibility and choice for county residents. The current transportation policies and recommendations on page 54 do not address transit, a key component of a diverse transportation system that meets the needs of the community as a whole. The Carroll Area Transit Service, as described in the plan, provides deviated fixed-route and demand-response services to county residents. It is appropriate to include a recommendation to support the continuation of such transit services. It is not clear if enhancement of current transit services or the need for other types of transit services have been assessed.

- A multimodal transportation system not only provides options/choices for residents but could prove to be more cost-effective and have less environmental impact in the long term. Only considering building and expanding highways to meet the automobile travel demand is not always a cost-effective solution. Such an approach will also increase the amount of vehicle miles traveled, greenhouse gas emissions and other adverse land use and environmental impacts. On page 55, the Plan indicates that it may cost \$3.6 billion to construct the proposed state and county road projects over the next 20 years. We encourage the County to explore comprehensive transportation and land use solutions including transit as a travel demand management strategy to address the transportation needs of the county.
- The Transportation Chapter includes a set of state, county and municipal highway projects. Considering the potential land use and environmental impacts of these projects, we suggest the County define different highway improvement policies and strategies for those within DGAs or outside of the DGAs to guide the development of these highway projects. In general, for areas outside the DGAs, it is more appropriate to consider system preservation and enhancement projects that would not provide significant capacity expansion which may not be consistent with land use policies.
- The Plan recommends 29 major highway improvement projects for various segments of state highways. Many of these projects are outside the County's Priority Funding Areas (PFA). All major state transportation projects are required to be consistent with the state's planning policy and comply with the PFA law. Under the PFA law, the State is prohibited from funding any major transportation project that is outside PFAs, unless an exception is approved in accordance with the The Smart Growth and Neighborhood Conservation- Smart Growth Areas Law (see earlier comments for more information). The Plan does not specify the types or priorities for most state highway projects listed in CH7-Table 1, page 56. If a project is only for minor system preservation, it would not be subject to the PFA law compliance and the Planning Policy consistency evaluation. Additionally, the map on page 61 would benefit from the inclusion of the PFA boundary which shows the eligibility of projects funded by the State. As noted earlier, the PFA boundary is not coterminous with the DGA boundaries.
- The Plan should recommend priorities for projects and discuss the rationale for the priority, e.g., supporting planned growth in the PFAs, providing needed connections to address local traffic, etc. Identification of priority projects would help to facilitate the funding process.
- While the proposed Manchester Bypass may help to divert through-traffic out of the Main street area, there are concerns about the potential adverse impacts of a bypass on existing communities and economic viability of the Main Street area, local land uses and State Smart Growth policies.
- MDP is aware that peak hour congestion occurs on the existing MD 30 in the Town of Manchester. All major transportation investments are evaluated for consistency with the State's planning policies. The proposed bypass would be outside the Priority Funding Area and is within the Upper Patapsco Rural Legacy Area. We encourage the County to work with the Town of Manchester, MDOT/SHA and MDP to address this transportation and land use issue.
- The recommended implementation strategies for the Transportation Chapter are good. MDP commends the County on its recommendation to develop and adopt a bicycle and pedestrian facility master plan. This will help identify facility priorities and encourage non-automobile travel. It is also encouraging to read the strategies to, "Evaluate zoning and subdivision regulations to minimize cul-de-sacs," investigation of "developing a Complete Street Policy for relevant areas of the County," promoting access control/management on major highways and building "a connecting system of

internal and external streets” to provide for “shorter and fewer vehicle trips and better traffic circulation,” etc. (Appendix A, pages 144 – 145)

- It is not clear in the plan if the County requires the provision of sidewalks and bicycle facilities in new developments or in roadway projects, especially for areas inside the DGAs. A requirement on these facilities could help the County to provide and fund pedestrian and bicycle facilities.
- The description of the transportation system on pages 30 and 52 should include transit service as part of the system.
- The County should consider opportunities to for park-n-ride facilities for transit and ride-sharing to help reduce the number of single occupancy vehicle trips. MDP recommends coordinating local park-n-ride lot planning with SHA and/or MTA.
- It is recommended that the County consider a land use recommendation or implementation strategy that discourages strip development along major state highways. This land use strategy will complement the access management/control strategy discussed in the Plan.

Chapter 8: Housing

- The Plan does a good job summarizing the existing and potential housing challenges faced by the County. These challenges include:
 - Addressing the need for diversified housing, specifically the existing limitations of County Subdivision and Zoning ordinances to provide for multi-family and higher density housing, as well as deficient amounts of land zoned for these uses.(page 64)
 - Affordability of housing, with over half the county’s renters paying more than 30% of income for housing; and the increasing mismatch between salaries and housing prices.
 - Providing housing for an increasing aging population at the same time as for younger residents.
 - Providing infrastructure and services to existing housing. Currently, the average housing unit does not generate enough taxes to offset the cost services and maintenance to those developments.(page 66)

However, the recommendations and implementation strategies for housing are general and appear to only address the need for diversified housing/mixed-use zoning. The county should consider recommendations and implementation strategies that address the other identified housing challenges.

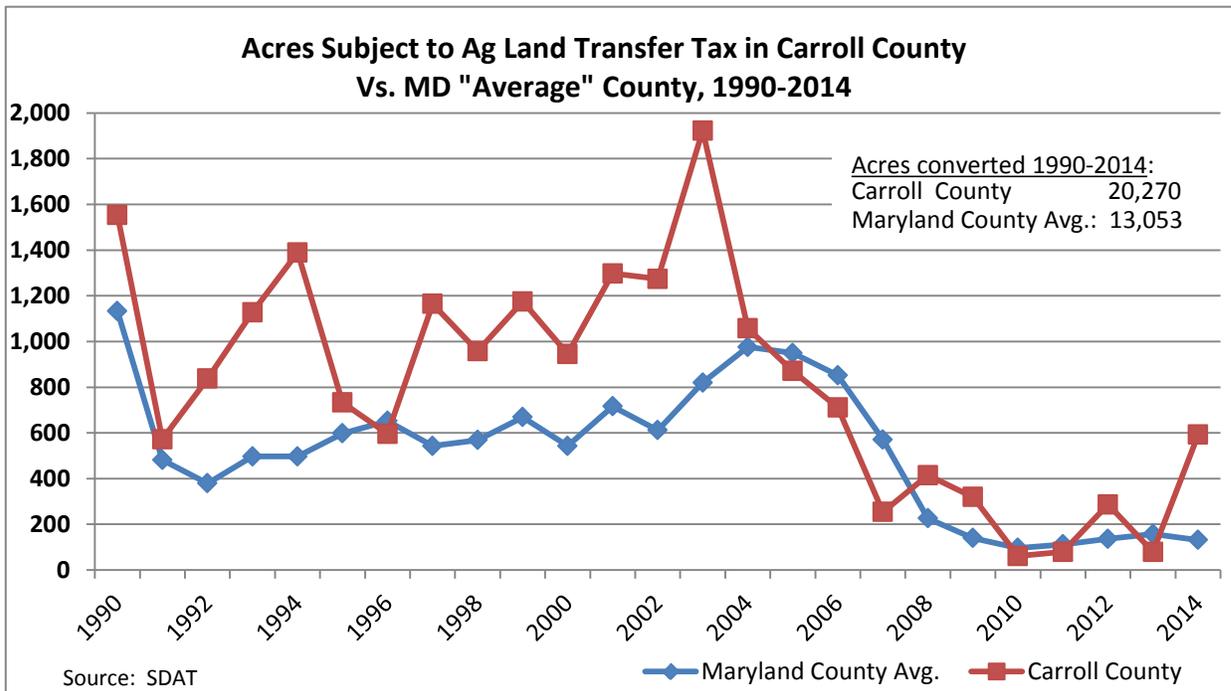
- By 2030, 23.5% of the county population will be over the age of 65. The plan states that over the last decade several age-restricted communities have been constructed throughout the county, additionally noting this helps those who wish to downsize. Please consider addressing the increased housing needs of those 65 and over, since the needs for this segment of the population will become greater over time. This segment of the population will also have other service needs that the plan does not appear to address, such as transportation and healthcare. (page 65)
- Page 66 of the plan notes that currently the average home does not generate enough tax revenue to offset the cost of services. While the plan does recommend addressing this gap through increasing the commercial and industrial tax base, the county may also want to consider the benefits of providing a diversified housing stock on the tax base. Please see the article entitled “The Missing Metric’ in the August 2013 issue of *Government Finance Review*- <http://www.1000friendsofflorida.org/wp-content/uploads/2013/11/August-2013-Government-Finance-Review.pdf>

- It would be helpful to include a chart identifying the current number of acres in each of the respective generalized zoning categories (low, medium, and high density residential). The inclusion of this information for municipalities and DGAs, in addition to the areas covered specifically by the Plan would also be helpful.
- Page 26 states that 21% of the County’s population will be over 65 by 2030 while page 65 shows that 23.5% of the County’s population will be over 65 by 2030. This figure should be consistent throughout the plan. Providing the date of the source information would also be helpful.
- Please make sure to use the most up-to-date information for ACS data, as well as MDP’s Socio-Economic profile data.

Chapter 9: Agriculture

- While the Master plan uses the Agricultural Census as a measure to report the conversion of agricultural lands in the County, MDP uses the “acres subject to the Maryland agricultural land transfer tax” metric. This tax is collected when farmland no longer qualifies for agricultural assessment, because it will be converted to another use.

The graph below shows how much land in the county was converted for each fiscal year since 1990. By this measure, we can see that land conversion in Carroll County far exceeds the loss in the “average” Maryland County. While this trend has been downward since 2004—before the 2008 downturn in real estate—the most recent figures for FY2014 show a sharp increase in the conversion of agricultural lands. The County should evaluate this recent uptick to ensure that it does not become a trend.



- The policies and recommendations in this chapter are encouraging to read, including the call for continued easement funding and other incentives for preserving land. Additionally, the Plan clearly states that agriculture is “the County’s most important industrial asset,” and that preserving at least 100,000 acres is vital for “securing an adequate land base for the County’s agriculture,” and that “preventing further fragmentation...is imperative...” “The Fiscal Impact to the County” also elaborates on the economic and fiscal benefits of preserving farmland.

Chapter 10: Priority Preservation Area

- The Plan states that the County’s PPA contains about 92,909 acres. Of this land, 80,736 acres are undeveloped. The preservation goal of 80% of the undeveloped land amounts to 64,589 acres. With 44,581 acres already preserved in the PPA, Carroll County needs to preserve another 20,008 acres in the PPA to reach its preservation acreage goal there.

The County has set a goal of preserving 100,000 acres. Currently there are over 64,000 acres under easement and the County has a preservation rate of 2,459 acres annually. Based on this; “the goal can be achieved in 14 years” (page 74). The County is commended for their achievements and commitment to preservation and we encourage the County to continue these efforts.

- Page 76 of the plan states that the agriculture zone is 1 unit per 20 acres. According to the county land use title, § 155.091 Subdivision in the Agricultural District, the yield is more than 1 unit per 20 acres. This section of the plan should be updated accordingly.

Size of Tract to be Subdivided	New Lots	Remaining Portion	Total
Under 6 acres	0	1	1
6 – 20 acres	1	1	2
20.0001 – 40 acres	2	1	3
40.0001 – 60 acres	3	1	4
60.0001 – 80 acres	4	1	5

For 80-100 acres, we can extrapolate that five lots plus a remainder are allowed, for a total of six lots. This standard applies to each tract of a farm under a multi-tract deed. Furthermore, a tract that has not been divided since April 23, 1963 is also allotted two off conveyances. More density can be achieved because “where a tract, parcel, or remainder is crossed by a publicly maintained road, and the road is not owned in fee simple by a government agency, it shall be deemed that the road has divided the land into separate parcels” (§155.02(D)).

Chapter 12: Heritage

- We appreciate that the Plan addresses preservation and compatible growth with the County’s traditional rural and agricultural character in Goals 11 and 15 (page 22), as well as devoting a full chapter to “Heritage” and related resources. The chapter provides a clear context of Carroll County’s historic and cultural resources, as well as relevant state and federal programs.

- The County may want to reference the Sustainable Communities Tax Credit's new Small Commercial program, designed to help fund modest rehabilitation projects, which are frequently undertaken in smaller, Main Street-type communities.
- Maryland Historical Trust is available to assist the County as it implements the recommendations for survey and inventory listed in Chapter 12. Funding is available for these activities through the Certified Local Government program, administered by the National Park Service and the Maryland Historical Trust. Participation in the program requires an application and certification process.

Chapter 13: Environmental Resources

- Page 93 discusses the need to adopt uniform definitions for environmental resources to adequately provide consistent conservation. The section states that definitions for both the "sensitive areas," as defined in law and the "environmental resources" are included in Appendix C- Glossary; however these definitions could not be found.
- The map of Sensitive Areas on page 94 of the plan shows "Sensitive Species Project Review Areas," it would be helpful to define these areas. If they are coincident with the general locations of rare, threatened and endangered species, as defined by the Maryland Department of Natural Resources, please indicate this in the map legend.
- Page 107 notes that Carroll County is participating in the Regional Greenhouse Gas Initiative (RGGI) – The County should expand this discussion to explain their role in the RGGI.

Chapter 15: Employment/Economic Development

- MDP is encouraged by the County's examination of jobs-housing balance issues. The consideration of transportation and land use impacts related to this imbalance and proposals to increase the numbers of jobs in the County to reduce residents' need for commuting outside the County for employment are good.
- On page 139, the Carroll County Master Plan Map shows several Employment Campus areas outside the DGAs, which seems to contradict the County's intent to locate employment land uses within the DGAs where infrastructure including transportation facilities exists or is planned. We encourage the County to reassess this scattered approach to planning for future employment campuses and focus on developing employment opportunities inside the DGAs.
- The county is commended on the efforts taken thus far to encourage job growth, such as improvements to the County's gateways, fiber network, business training programs and small business revolving loan fund.
- Page 117 refers to the 2007 Economic Development Land and Employment Needs Study (EDLENS) completed by Parsons-Brinkerhoff. Consideration should be made to discuss how the Carroll County Planning Department has updated the 2007 data for this Master Plan. For example, how have estimates of jobs needed and land available for commercial and industrial use changed since 2007?
- The 2007 study estimated that the County would need to zone approximately 4,600 acres of land to commercial and industrial uses to accommodate an additional 40,000 jobs; however the study also indicated less land would be needed if the County is able to use existing sites (page 117). On page 124,

the plan states that in 2012 about 775 acres of commercial/business and 3,940 acres of industrial remain for development. This is a total of 5,375 acres, well above the 4,600 acres needed to accommodate future needs. This plan also provides for additional acres in these land use types. It would be helpful to address the increases in these categories relative to the 2007 EDLENS study and needs. Additionally, much of the proposed employment land will be planned for water & sewer service.

- The plan would benefit from a discussion of CH15-Table 4 and CH15-Table 5, which provide the available acres of industrial and commercial land uses. Currently, it is difficult to determine the relationship of these tables to the overall land use needs. Additionally, the figures do not appear to match those provided in the text on page 124.
- The plan currently includes only a summarization of acres currently planned for commercial, business, and industrial land uses. A chart should be provided comparing the potential acres based on the future land use as well.
- The source information for CH15-Table 4 references the land-use designation map on page 139. The note states that the map “shows the land use designations adopted by each community for unincorporated land within the Designated Growth Areas.” The map on page 139 does not include the land uses for the unincorporated portions of the DGAs. The map and related discussions would benefit from the inclusion of this information on the map.
- The recommendations and implementation strategies for Economic Development are good. The County may want to consider revising implementation strategy Y that states “along major roadway corridors encourages the assembly of small, separate adjoining parcels of developable land into single larger parcels...” This may lead to increased amounts of strip center development. Additionally, the draft 2010 Master Plan included several recommendations regarding DGAs and the expansion of business, commercial and industrial land uses. Given the 2014 Plan’s statement of targeting growth in DGAs, the inclusion of these recommendations from the 2010 draft would be relevant.

Chapter 16: Land Use and Growth Management

- The relationship between the 2014 Carroll County Master Plan and Community Plans is unclear. The Plan makes reference to “the areas covered by the master plan,” however the plan never clearly states what those include. Based on many of the goals, policies, recommendations, and implementation strategies outlined in the plan it appears that the DGAs are included; however discussions in the Land Use Chapter would indicate otherwise. The plan needs to better articulate its geographic scope and the relationship between the County and Community Plans.
- The Plan’s discussion of Land Use/Land Cover change between 1973 and 2010 appears to include only those areas outside the DGAs. Given this assumption, the Plan states that this portion of Carroll County was composed of 95% agriculture in 1973 and 75% in 2010. The County states that if it were not for the strategies employed by the County to concentrate growth in DGAs the conversion of land would be greater. It is important to recognize that the conversion of agricultural and forest lands within the DGAs are not summarized in this plan. While these areas are designated for growth the conversion of these land types should be considered when reviewing these statistics for the county and formulating future policy decisions and recommendations. MDP provides this data for the entire county on its website (link below). The trends for the remainder of the County should be provided in the plan to give readers a complete understanding of the land use changes that have occurred since 1973. <http://planning.maryland.gov/OurWork/landuse.shtml>

- On page 131, the Plan uses 2013 Use and Occupancy permit data to emphasize the County's success in locating growth within DGAs. The Plan states that approximately 78% of 2013 Use and Occupancy permits were located within the Municipalities and DGAs. MDP recommends that the Plan incorporate and discuss recent development trends in relation to Priority Funding Areas (PFAs) as well. According to the *2013 Carroll County Planning Annual Report*, only 69% of these permits were within PFA areas. The inclusion of this information by inside and outside PFAs will also provide the reader with a sense of how much development is occurring in areas with public facilities such as water and sewer.

Additionally, in reviewing this trend information in conjunction with the County's 2013 Annual Report, data on preliminary lots approved in the County were provided. While we understand that preliminary lots do not always equate to new realized units, the approval of these lots is an indication of possible future land use trends in the County. In 2013, of the 110 preliminary lots approved, only 25% (28 lots) were located in the PFA.

To this end, MDP recommends that the Plan incorporate and discuss growth inside and outside of PFAs in the context of the Annual Report requirements (Land Use Article §1-208). The allocation of expected growth would benefit from being placed in a summary chart which clearly lays out the many different factors used to determine future growth patterns (i.e. population, build-out and household size).

MDP also encourages the County to reconsider the incorporation of a goal related to growth in PFAs. The goal in the draft 2010 Carroll County Plan was to "increase by .5 percent per year the amount of growth within the PFAs and decrease by .5 percent per year the amount of growth outside the PFAs..."

- On page 131, the Plan discusses changes in the Designated Growth Areas since the 2000 Plan; noting that many of the changes were a result of completing the Water Resources Element in 2010. Table CH16-1 is helpful in summarizing the changes in acreage in the DGAs, however it is unclear whether these statistics also include the municipalities, or are simply the unincorporated areas of the County. The inclusion of the previous boundary on the map on page 132 would also be helpful.
- On pages 133-135, the Plan says that "outside of the DGAs, the 28,104 existing residential units (as of July 2014) would combine with the 15,141 estimate potential residential units to create 43,245 residential units outside of the DGAs at build-out based on current land use designations, with 53.1 percent of all residential units located in DGAs and 46.9 percent located outside DGAs."

Given the County's goal of directing development to DGAs, this percentage of units outside the DGA is high. While the Plan does recognize that all the potential development "is unlikely to manifest," recommendations and implementation strategies should be included in the plan that address the County's commitment to locating growth in the DGAs and limiting growth outside the DGAs.

- It is not exactly clear from the title of Table CH16-3, "Designated Growth Areas Future Land Use acres when added to the Master Plan" what this table is showing. If appears the table is reporting the increase in land use by category of areas formerly covered by the DGAs.
- The build-out numbers referenced on page 133 state that they are based on the current land use. Given the proposed changes in land use, and referenced changes in the DGAs, and water and sewer master plan, these figures should be updated and provided in the plan. If this analysis includes these changes, it should be noted. It would also be helpful for readers of the plan to see the land use implications of these changes with a comparison of the current and proposed build-out figures.

- Table CH16-2 shows the medium range build-out scenario for the County, however the Plan states that “an estimate based on the low range criteria is a more likely scenario.” The figures for the low range build-out scenario should also be provided in the chart.
- The build-out numbers provided in the Plan do not match those provided in the Carroll County 2013 Annual Report, adopted July 2014. Relevant source information should be provided with the numbers in the plan.
- On page 134, the Plan states “if the DGAs are to continue absorbing the majority of the growth, creative efforts will need to be investigated and undertaken aggressively, before all options are eliminated simply due to existing development.” A discussion or inclusion of recommendations or implementation strategies that address this stated challenge would be beneficial to the plan. The County may want to revisit the policies and recommendations of the draft *2010 Master Plan: Carroll County Challenges & Choices*; specifically, the policy to make infrastructure improvements in DGAs a priority and the recommendation to “create a “mixed-use” zone for the County to provide additional opportunities for higher-density housing in the DGAs.”
- The *2010 Draft Master Plan: Carroll County Challenges and Choices* included a map that showed the future land use designations for the entire county, including DGAs and municipalities. MDP suggests adding this map into the 2014 Master Plan to provide an understanding of how land use plays out in the entire County. This will also provide a more comprehensive look at the future land use patterns in the County.
- Please consider a more detailed discussion of the future land use categories in Chapter 16: Land Use & Growth Management. The reader of the Master Plan should not need to search through appendices to find definitions of the land use categories.
- While the draft Plan references the Reservoir Watershed Management Agreement of 2005 (Agreement) in Chapter 2 of the plan, this agreement is not discussed as it relates to water resources and land use changes. This discussion should be included as Carroll County is a signatory to the agreement and the agreement pertains to land use decisions.

Further, we note that the proposed land use map includes changes in land use—replacing Conservation land uses with Very Low Density Residential land uses, removing the Agriculture land use designation within Rural Villages, and introducing new areas planned for industrial uses. These changes may impact the water quality of the reservoirs. If it is determined that these changes do not influence the water quality, those findings and supporting analysis should be presented in the Plan.

We understand that Carroll County will present to the Baltimore Metropolitan Council’s Reservoir Watershed Management Program at the October 15 meeting. If additional concerns are put forward at the meeting beyond those described here, please address those in the 2014 Plan.

- The Plan shows several heavy-industrial areas: southwest of Taneytown, south of Hampstead, and southeast of Westminster, plus a light-industrial area adjacent to southwest Hampstead. These are near easements or in or near the Priority Preservation Area (PPA)/Rural Legacy Areas (RLA). It is not clear that industrial activity already exists on the sites. If it is, the Plan should say so; if not, the Plan should explain why these areas in particular are designated for heavy-industrial use.
- The “Conservation” areas are discussed in great detail in the Land Use Chapter of the Plan. In the Gillis Falls area discussion, the County acknowledges that the “C” zoning district has been unsuccessful with respect to its intent to protect natural resources and has functioned as a low

density residential development zoning district. Although the County has re-designated many of the previous “Conservation” areas as “Very Low Density Residential” or “Low Density Residential” because they are already subdivided, there does not seem to be a discussion of reducing allowable density in the remaining “Resource Conservation” areas. The County should state this as a policy and consider it in a comprehensive rezoning process upon adoption of the 2014 plan.

The County may want to reconsider recommendations from previous County draft plans:

- The draft 2010 Master Plan included recommendations to “review and revise the Conservation Zoning District to make it more consistent with the stated intent (i.e., protection of environmentally sensitive areas).
- The “Pathways” draft recommended that the 1:3 conservation zoning be changed to 1:20.
- The statement on page 131, “Over the last several decades, the County’s land use has been changing from an overwhelmingly rural County to a predominantly agricultural with increasing suburbanization” is confusing. Has agricultural land been increasing in the county? How does “rural” differ from agricultural?
- MDP commends the County for acknowledging existing Rural Villages. We would note that many of the non-residential areas were already zoned appropriately in the County’s zoning ordinance but that the addition of the Village Residential land use designation could increase development potential within the Rural Villages.
- Recommendation G on page 140 states, “consider converting Rural Villages into full Priority Funding Area designations, where appropriate.” A discussion should be provided in the Land Use Chapter providing more information on what is meant by this recommendation and which Rural Villages are being considered in this recommendation.
- Page 129 states that “State law requires that comprehensive plans be reviewed, and updated if needed, every six years.” State law now requires that comprehensive plans be reviewed and updated every ten years.
- Text on page 136 states that Chart CH16-3 shows a breakdown of the County’s future land use categories. MDP believes this section should reference Figure CH16-1. The figure and text should also include a note as to what geographies are included e.g. DGA, GAB, municipalities.
- What if any relationship exists between the Resource Conservation and Reservoir Land Use designations? Recommendations that for these areas is not discussed.
- The Plan calls for directing future growth to the DGAs and preserving the rural and agricultural characteristics of the areas outside the DGAs. We encourage the County to strongly consider compact, mixed-use and well-designed community development patterns in the DGAs, especially in the Priority Funding Areas. The compact development should be supported with a system of well-connected streets and roads.
- Table CH16-5 on page 137, illustrates the changes in generalized land use between the 2000 and 2014 land use plans is confusing. It is unclear what the “2014 Master Plan Acres Formerly in the 2000 Master Plan” section is showing. If it is intended to be a direct comparison of the 2014 to the 2000 Master Plan, the numbers do not add up. If this difference is attributed to changes in the DGA it would be helpful to note this on the chart.