



Maryland DEPARTMENT OF PLANNING

6/28/2024

Ralph Ghent
Chairperson, Town of Mount Airy Planning Commission
110 S. Main Street, P.O. Box 50, Mount Airy MD 21771

Dear Mr. Ghent,

Thank you for the opportunity to comment on the draft Town of Mount Airy Comprehensive Master Plan (Draft Plan). The Maryland Department of Planning (MDP) believes good planning is important for efficient and responsible development that addresses resource protection, adequate public facilities, housing, community character, and economic development. Please keep in mind that MDP'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.

MDP 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, Disabilities, and Housing and Community Development. To date, we have received comments from the Maryland Historical Trust and Departments of Transportation, Environment, Natural Resources, and Housing and Community Development. These comments are included with this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

The department hopes that Mount Airy considers the comments included in this review as a reflection of our desire to support Mount Airy in its stated purpose to "be a high-quality environment for living, working, learning, and playing." MDP commends the city for the forward-looking Draft Plan, and notes that our suggestions are intended to help further the implementation of this vision. MDP staff are available and eager to assist Mount Airy in any Draft Plan updates, including meeting the Housing Element requirements of HB1045 and HB90. Please let the department know if the city would like to meet with us to discuss our comments.

MDP respectfully requests that this letter and accompanying review comments be made part of the city's public hearing record. When the Comprehensive Master Plan is adopted, please send Brooks Phelps a copy of the PDF document.

If you have any questions or concerns regarding these comments, please email the Central Maryland Regional Planner, Brooks Phelps at brooks.phelps@maryland.gov.

Sincerely,

Joe Griffiths, AICP
Director, Planning Best Practices

Enclosures: Review Comments Town of Mount Airy Draft Comprehensive Master Plan

cc: Larry Hushour, Mayor, Town of Mount Airy
John Breeding, Director of Planning, Zoning Administrator, Town of Mount Airy
Susan Llareus, Planning Supervisor, Maryland Department of Planning
Brooks Phelps, Regional Planner for Central Maryland, Maryland Department of Planning



**Maryland Department of Planning
Review Comments
Town of Mount Airy Draft 2023 Comprehensive Master Plan**

The Maryland Department of Planning (MDP) received the Draft 2023 Comprehensive Master Plan (Draft Plan) from the Town of Mount Airy on May 1, 2024. 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 contributed comments and others may submit comments separately. If comments are subsequently received by MDP, the department will forward them to the town.

Draft Plan Summary

This Draft Plan is a full update to the adopted and approved 2013 Mount Airy Master Plan. The Draft Plan does not greatly diverge from the currently adopted comprehensive plan’s structure, but includes updates to reflect current planning practices, including mixed-use districts and pedestrian safety. In addition, MDP believes the Housing Element does not meet current requirements following the passage of HB1045 and HB90, and it appears to be missing an element that addresses areas of critical state concern.

Maryland State Visions – Synopsis

Land Use Article Section 1-201 requires Maryland jurisdictions with planning & zoning authority to implement the state’s 12 Planning Visions through the comprehensive plan. The visions reflect the state’s ongoing aspiration to develop and implement sound growth and development policy. The visions address: quality of life and sustainability; public participation; growth areas; community design; infrastructure; transportation; housing; economic development; environmental protection; resource conservation; stewardship; and implementation approaches.

Plan Analysis

The Introduction of the Draft Plan explains the Vision Statement on page 1:

“Mt. Airy will be a high-quality environment for living, working, learning, and playing. It’s a Town with a rich array of housing, businesses, industrial, and recreational offerings with more-than-adequate public facilities; where land use policies (and decisions) have protected our environment and strengthened our heritage of being a close community with small town charm.”

Maryland’s Planning Act of 1992, and subsequent legislation in 2000 and 2009, require that the 12 Planning Visions be included and implemented through local comprehensive plans. The visions are found in the Land Use Article and the Maryland Economic Growth, Resource Protection, and Planning Policy of the State Finance and Procurement Article, Subtitle 5-7A. The Draft Plan includes the text of the 12 Planning Visions on page 13. MDP recommends that the town incorporate the visions into the subsequent chapters of the Draft Plan to demonstrate adherence.

Municipality Minimum Planning Requirements

Land Use Article (LUA) Section 3-102 describes the required and optional elements for non-charter county and municipal comprehensive plans but does not mandate how they are to be addressed. The following checklist identifies required plan elements and how the Draft Plan addresses them.

Checklist of Maryland Code (Land Use Article) Element Requirements for Non-Charter Counties and Municipalities			
Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Reference
(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.	Chapter 5, Page 97 (within Municipal Growth Element chapter) and Chapter 7 (Community Facilities)
(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	Missing; introduction states there is one but not clear where
(c) a goals and objectives element	L.U. § 3-102(a)(1)(iii)	L.U. § 3-110 -- Goals and objectives element	Chapter 9 (Summary of Objectives)
(d) a housing element	L.U. § 3-102(a)(1)(iv)	L.U. § 3-114 -- Housing element SB-687(2021)	Missing/incomplete; introduction suggests it is part of Chapter 4.
(d) a land use element	L.U. § 3-102(a)(1)(v)	L.U. § 3-111 -- Land use element	Chapter 4
(e) a development regulations element	L.U. § 3-102(a)(1)(vi)	L.U. § 3-103 -- Development regulations element	Discussed within Chapter 4
(f) a sensitive areas element	L.U. § 3-102(a)(1)(vii)	L.U. § 3-104 -- Sensitive areas element	Chapter 3, Page 42 (within Natural Resources chapter)
(g) a transportation element	L.U. § 3-102(a)(1)(viii)	L.U. § 3-105 -- Transportation element	Chapter 6
(h) a water resources element	L.U. § 3-102(a)(1)(ix)	L.U. § 3-106 -- Water resources element	Beginning Chapter 3, Page 53 (within Natural Resources chapter)
(i) a mineral resources element, IF current geological information is available	L.U. § 3-102(a)(2)	L.U. § 3-107 -- Mineral resources element	Chapter 3, Page 39 "Geology"
(j) for municipalities only, a municipal growth element	L.U. § 3-102(a)(3)	L.U. § 3-112 -- Municipal growth element	Chapter 5
(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)	(d) Chapter 3
(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 page 13, implementation discussed below

Checklist of Maryland Code (Land Use Article) Element Requirements for Non-Charter Counties and Municipalities			
Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Reference
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		N/A

Conformance with Section 3-102 of the Land Use Article

The following analyzes whether the Draft Plan meets the requirements of the municipal comprehensive plan elements, in accordance with the LUA.

1. Development Regulations Element – Synopsis

The element is required to include the planning commission’s recommendations for land development regulations to implement the plan. Regulations are required to be flexible to promote innovative and cost saving site design, protect the environment, and identify areas of growth. The areas identified for growth are required to encourage flexible regulations, which should further promote economic development using innovative techniques, streamlining the review of applications, including permit review and subdivision processing.

Plan Analysis

The introduction to the Draft Plan defines the Development Regulations Element, but a separate “Development Regulations Element” is not included. The Land Use and Zoning Chapter does include a list of “Rezoning Recommendations”, but these are largely already developed properties (pg 66). In addition, the chapter’s Strategic Goal B of Responsible Growth could help to meet the requirements of a Development Regulations Element, although it suggests that only limited residential growth should be allowed. In addition, the stated goals of increasing mixed-use and downtown development appear to be aspirational, since the downtown properties identified in the following chapter are not proposed for higher intensity zoning. MDP recommends, as a potential Draft Plan implementation strategy, an analysis to determine if the current zoning is conducive to the development desired in the Draft Plan.

The Municipal Growth Element chapter further discusses the previous chapter’s goals for infill development and downtown redevelopment and includes lists of potential properties. These lists largely suggest retaining the existing zoning (or simply state the existing zoning for the downtown parcels), which has resulted in the current stagnation of downtown economic development (further expressed in the town’s sustainable community action plan, which indicated a lack of foot traffic and residents downtown). MDP suggests that more flexibility with the allowable zoning could help to incentivize redevelopment and investment into the community, as well as increase the number of residents to adequately support main street businesses through mixed-uses.

2. Housing Element - Synopsis

The housing element is required to address the need for housing within the jurisdiction that is affordable to low-income and workforce households. The housing element is required to also assess fair housing and ensure that a jurisdiction is affirmatively furthering fair housing through its housing and urban development programs.

Plan Analysis

The introduction to the Draft Plan states that the Housing Element is included in Chapter Four: Land Use and Zoning. However, as the subtitle implies, MDP finds that this chapter primarily satisfies the Land Use Element requirement, although it does include a table on page 59 that shows four proposed subdivisions that would allow for 423 new housing units if permits are issued. The paragraph following the table discusses the town's ordinance that limits the number of permits issued each year. Limiting the number of permits building permits may be acting as a disincentive to investors and a barrier to development.

MDP finds that these paragraphs do not meet the requirement for a Housing Element as required by HB 1045. This bill requires comprehensive plans to address the need for affordable housing, including but not limited to workforce housing and low-income housing, as defined by statute. In addition, the Housing Element must also meet the requirements of HB 90 and include meaningful actions to affirmatively further fair housing. The Draft Plan includes a goal that supports "affordable entry-level housing", but does not discuss income levels, fair housing, nor actions that would foster an inclusive community for households of all income levels. MDP has developed tools and guidance to assist jurisdictions with developing the Housing Element, meeting the requirements of HB 1045 and HB 90, and suggests the town confer with its municipal attorney on whether the Draft Plan meets the requirements of [LUA Section 3-114](#).

3. Sensitive Areas Element – Synopsis

The sensitive areas element is required to include the goals, objectives, principles, policies, and standards designed to protect sensitive areas from the adverse effects of development (more recently referred to as climate change impacts). The LUA also assigns sensitive areas element data provisions and review responsibilities to the Maryland Departments of the Environment and Natural Resources.

Plan Analysis

Beginning on Chapter 3, Page 42 of the Draft Plan includes a Sensitive Areas section that describes the groundwater, streams, floodplains, endangered habitats, and other conditions present in Mount Airy. Many of these natural features overlap with the Water Resources and Natural Resources Elements, and the goals from this section include increasing forest cover and protecting groundwater reserves.

4. Transportation Element - Synopsis

The transportation element is required to reasonably project into the future the most appropriate and desirable location, character, and extent of transportation facilities to move individuals and goods, provide for bicycle and pedestrian access and travelways, and estimate the use of proposed improvements.

Plan Analysis

The Transportation Element chapter is heavily focused on roadway capacity and functional classification designation. The Draft Plan identifies several roadway capacity improvement projects throughout Mount Airy. MDP suggests that while these improvements can reduce traffic volume in the short term, they could also increase speeds in the short term, as lanes expand but prior to the congestion that will eventually result, and promote development further from existing facilities, worsening infrastructure costs and traffic in the long-term. MDP suggests taking these factors into consideration when developing an implementation strategy.

The Western Bypass sections could provide traffic relief to Main Street, but MDP cautions that it could both increase development pressure along the newly expanded roads and reduce motorist interest and access to already struggling Main Street businesses. MDP suggests that if the bypass is completed, that

Main Street could be redesigned in a way that encourages a walkable center for the community. This would be consistent with the Draft Plan’s desire to “maintain a small town character and design and build a community-focused road network with safe pedestrian and bicycle access” (pg 84).

With long car commutes outside of the town common, MDP suggests the town consider implementing transportation demand management strategies such as commuter choice programs and alternative transportation, including ridesharing and transit. MDOT has many resources available as part of its [Commuter Choice program](#).

MDP encourages Mount Airy to further its discussion of traffic calming and bicycle and pedestrian facilities and explore a full Complete Streets Policy, which could include visions, goals, policy, and design standards to provide increased transportation choices and mobility for all users. It should be noted that the Level of Service and volume to capacity ratio discussed throughout the chapter are important methods to measure congestion, but do not consider pedestrians, bicyclists, and other non-motorized modes.

5. Water Resources Element – Synopsis

The Water Resources Element (WRE) is required to consider available data provided by MDE to identify drinking water that will be adequate for the needs of existing and future development proposed in the plan, as well as suitable receiving waters and land areas to meet stormwater management and wastewater treatment and disposal needs. MDE and MDP are available to provide technical assistance to prepare the water resources element, ensuring consistency with MDE programs and goals.

Plan Analysis

Water resources considerations are mainly discussed in Chapter 3: Natural Resources and in Chapter 5: Municipal Growth Element. The Draft Plan refers to the Carroll County Water Resources Element as the town's WRE and explains that the county comprehensive plan will be updated in 2024; but the Draft Plan also states that the town's WRE is currently being updated from 2010. It is unclear whether the updated town WRE will be included in the county plan or the adopted version of this Draft Plan, or both.

The Draft Plan discusses commercial, institutional and industrial growth goals, population projections for low, mid, and high growth scenarios, as well as infill and redevelopment potential. It is unclear if these goals, scenarios, and redevelopment properties are considered in the demand projections, which may lead to the town being unable to meet the goals of its land use element.

The Draft Plan describes a 165,000 gallons per day shortfall is described and suggests that this demand may be met with the annexation of the Harrison/Leishear property. However, the town should consider alternative options if the annexation is not ultimately approved.

The Draft Plan describes inflow and infiltration (I&I) issues with wastewater flow and the actions taken to address it. However, it is not clear if the actions resulted in improved consistency between supply water and wastewater flow numbers. If the I&I issues have not be adequately addressed, they could result in significantly increased wastewater flow and detract from sewer system capacity.

6. Goals and Objectives Element - Synopsis

This element requires that comprehensive plan goals, objectives, principles, policies, and standards guide the development, economic growth, and social well-being of the community.

Plan Analysis

The Goals and Objectives Element is satisfied through a Vision Statement and Six Strategic Goals, which are then furthered by specific objectives and implementation strategies in Chapters 3, 4, 6, 7, and 8. These goals are summarized again in Chapter 9.

7. Land Use Element - Synopsis

The land use element is required to reasonably project into the future the most appropriate and desirable patterns for the general location, character, extent, and interrelationship of the uses of public and private land.

Plan Analysis

The Land Use Element is satisfied by Chapter Four: Land Use and Zoning. As discussed in the Development Regulations review above. The Draft Plan is focused on “Responsible Growth” through infill development and summarizes properties suggested for rezoning.

The Land Use Element also includes a goal to refine its MXD (Mixed Use) zoning district. However, it is focused on providing transparency surrounding MXD processes, including advertising hearings and Adequate Public Facilities Ordinance certifications, among others. MDP believes that the goals for the MXD zoning appear to be narrowing what is allowed and are focused on making the development low-impact. MDP suggests that more flexibility could be added to this designation.

8. Community Facilities Element - Synopsis

The community facilities element is required to propose, as far into the future as is reasonable, the most appropriate and desirable patterns for the general location, character, and extent of public and semipublic buildings, land, and facilities. These facilities may include, but are not limited to fire stations, libraries, cultural facilities, hospitals, places of worship, school and education facilities, and parks.

Plan Analysis

Overall, it appears that Mount Airy and its surrounding communities experience funding issues due to its split geography between four counties. An alternative funding partnership could be explored to remedy the lack of certain facilities in the immediate area in the longer term.

MDP has the following additional comments on the Community Facilities chapter:

Parks and Recreation

This section suggests that the town’s open space deficit could be addressed by repurposing two large parcels zoned for mixed-use. MDP believes that this would undermine the land use goals identified elsewhere in the Draft Plan and encourages the town to reconsider this strategy.

In addition, the Adequate Public Facilities Ordinance (APFO) requires 3 acres of open space for every 100 citizens. According to the National Recreation and Parks Association, and their [2024 NRPA Agency Performance Review](#), the average amount of parkland provided per 1,000 residents is 10.6 acres. MDP suggests that the town’s APFO parkland requirement is too high, three times the national average. This may have negative consequences for housing production in the community.

The Harrison-Leishear Property annexation is proposed as a potential sports field complex. Elsewhere, this property is identified as a potential water treatment plant site. MDP suggests clarifying the town’s priorities for this site, or if it is intended to be used for dual purposes.

9. Municipal Growth Element - Synopsis

The Municipal Growth Element (MGE) is only required in Maryland municipal comprehensive plans. The MGE is required to plan for and describe the municipality's past growth patterns, the capacity of land available for new and infill development, and areas outside of the existing corporate boundaries into which the municipality wishes to grow. The MGE is required to calculate the land area needed to satisfy the demand for growth based on population projections and desired densities. The MGE needs to consider and include any rural buffers, transition areas, and sensitive areas to be protected. MGEs are also required to consider and plan for the community facilities and public infrastructure, as well as their financing mechanisms, required to accommodate desired growth. If a municipality wishes to annex land, such areas are required to be included and described in the MGE.

Plan Analysis

The MGE includes information related to infill development and redevelopment opportunities within the existing municipal boundaries. It also includes population projections and potential scenarios, and states that anticipated population growth can be absorbed within the town's current limits.

The MMGE also includes lists and summaries of parcels for annexation in both Carroll and Frederick Counties, which are largely proposed for low-density residential development and conservation, although it notes that there is a potential for additional water resources from these properties. MDP notes that this list does not appear to be finalized, as it includes a PDF note reminder that the list needs to be edited.

10. Areas of Critical Concern Element - Synopsis

The areas of critical state concern element are required to include planning commission recommendations to determine, identify, and designate areas that are of critical state concern.

Plan Analysis

The introduction (page 8) to the Draft Plan describes this element and its components, but it does not appear to be included.

11. Mineral Resources Element - Synopsis

If current geological information is available, a comprehensive plan is required to include a Mineral Resources Element. It should identify land that remains undeveloped to provide a continuous supply of minerals, which are defined in the Environment Article. They include clay, diatomaceous earth, gravel, marl, metallic ores, sand, shell, soil, and stone. The element is required to further identify post excavation land uses and incorporate strategies that balance resource extraction with other land uses and prevent, as much as possible, preempting mineral extraction in the jurisdiction.

Plan Analysis

The Natural Resources chapter describes the geology of Mount Airy on page 39 but does not discuss extraction. This element is optional if the town does not have a supply of significant minerals for extraction as defined in the Environmental Article. MDP notes that the introductory section on page 8 states that Chapter 3 contains a Mineral Resources Element. Clarification is needed.

13. Growth Tiers – Synopsis

The statement "The Town has not officially adopted a tier map with either Carroll or Frederick County, but by default, the Town is in Tier II. Unless required otherwise by the State of Maryland, any new development outside of the planned sewer service area would not be approved" is inaccurate in multiple ways. If the town intends to require all development within the town to develop on public sewer, the

adoption of the Tier Map is moot and has no impact on future development. The adoption of the Tier Map only impacts new residential subdivision served by onsite septic system. If the town does allow new residential subdivision development within the town to be approved with onsite septic systems; then not adopting a Tier Map would mean that new residential development would be limited to minor subdivisions until the area is served by public sewer. The statement "Unless required otherwise by the State of Maryland, any new development outside of the planned sewer service area would not be approved." implies that the State of Maryland would directly be involved in local development approval, which is not accurate. Mt. Airy is delegated planning and zoning authority from the state and as such is responsible for regulating and ultimately approving local development.

14. Plan Implementation

Implementation of the comprehensive plan is discussed throughout the Draft Plan as part of the Strategic Goals Implementing Strategies and is summarized in Chapter 9.

The Land Use Article Section 1-207(c)(6) requires jurisdictions to submit a comprehensive plan implementation report every five years. MDP reminds the city to adhere to this requirement in the future.

State Data Center

The State Data & Analysis Center has no substantive comments on the Draft Plan.

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

STATE AGENCY COMMENTS

The following are state agency comments in support of MDP's review of the Draft Plan. Comments not included here may be submitted under separate cover, or via the State Clearinghouse. If comments from other agencies are received by MDP, the department will forward them to the Town of Mount Airy as soon as possible.

Attachments

Page 10: Maryland Department of Natural Resources
Page 11: Maryland Department of Housing and Community Development
Page 14: Maryland Department of the Environment
Page 24: Maryland Historic Trust
Page 25: Maryland Department of Transportation



Wes Moore, Governor
Aruna Miller, Lt. Governor
Josh Kurtz, Secretary
David Goshorn, Deputy Secretary

Maryland Department of Planning
301 West Preston Street
Suite 1101
Baltimore, MD 21201

Memo: DNR comments on the Mount Airy 2023 Master Plan

To: Brooks Phelps
cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on the Draft Town of Mount Airy 2023 Master Plan. The draft document was distributed to appropriate contacts at the Maryland Department of Natural Resources and reviewed. DNR offers the following comment:

The Town of Mount Airy's Comprehensive Plan is in compliance with the Department's goals of preserving and conserving land while providing recreational opportunities for the community. The plan includes a section regarding specific essential infrastructure goals (pg. 131), and the planning process of the Capital Improvements Program (CIP). The Town owns and maintains thirteen (13) parks and partners regularly with both Carroll and Frederick counties Parks and Recreation departments on park development and acquisitions. The Town currently has an open space deficit of 74.7 acres, as its goal is to provide 3 acres of open space for every 100 citizens. The Town notes that the deficit will be addressed in future plan phases (pg. 132). The plan includes a comprehensive list of park information including park name, acreage and available amenities (pg. 132-133) and Carroll and Frederick county facilities available for Mount Airy residents. The Town has included a future park facilities plan with citizen demands including nature trails, wooded areas and open space, and picnic facilities (pg. 134). The Town has included needs based on citizen demands, one including a community recreation center to increase fellowship and create an indoor recreation space. At this time, this reader does not have any recommendations or changes needed of the Town of Mount Airy's Comprehensive Plan.

Once again, thank you for the opportunity to provide comments. If you have any questions about these comments or would like further information, please do not hesitate to contact me at 443-534-4151 or christine.burns1@maryland.gov.

Best,
Christine Burns

May 29, 2024

Brooks Phelps
Maryland Department of Planning
301 West Preston Street, 11th Floor
Baltimore, MD 21201

Dear Mr. Phelps,

Thank you for the opportunity to review and comment on the Town of Mount Airy 2023 Master Plan (the “Plan”). When reviewing plans, the Maryland Department of Housing and Community Development (“DHCD”) comments on items for which political subdivisions can strategically leverage DHCD’s resources to accomplish their housing and community development goals. DHCD also reviews comprehensive plans for consistency with relevant statutes and, if appropriate, Sustainable Communities Plans.

Overall, DHCD staff were impressed with the quality of the Plan. Staff in the DHCD Division of Neighborhood Revitalization reviewed the Plan and provided the following comments, which are meant to help realize the Plan’s goals. We present the following in no particular order:

1. The housing and economic development components of the Plan are consistent with and build upon the Sustainable Communities Plan.
2. The Plan identifies a need to revitalize the community through redevelopment of “long-vacant” buildings for which the DHCD’s Community Legacy Program grants could assist. Planning staff can learn more about Community Legacy online at <https://dhcd.maryland.gov/Communities/Pages/programs/CL.aspx> or contact Sara Jackson at 410-209-5812 or sara.jackson@maryland.gov.
3. The Plan identifies a goal to support the vitality of its downtown. DHCD’s Maryland Facade Improvement Program (MFIP) provides funding for aesthetic improvements to the exteriors of businesses located in Maryland’s Sustainable Communities in order to stimulate local economic activity and support community development. Planning staff can learn more about MFIP online at <https://dhcd.maryland.gov/Communities/Pages/StateRevitalizationPrograms/MFIP.aspx> or by contacting contact Sara Jackson at 410-209-5812 or sara.jackson@maryland.gov.
4. The Plan identifies a goal to support sustainable housing that enables seniors to remain active, healthy residents. DHCD can assist with home repairs that improve comfort, livability, and accessibility for homeowners through its Special Loan Programs. Planning

staff and residents can learn more about these programs at <https://dhcd.maryland.gov/Residents/Pages/SpecialLoans.aspx> or contact the program directly at 301-429-7409 or DHCD.SpecialLoans@maryland.gov.

5. The Plan identifies a goal to encourage infill development for which DHCD's Strategic Demolition Fund (SDF) grants could assist. Planning staff can learn more about SDF online at <https://dhcd.maryland.gov/Communities/Pages/programs/SDF.aspx> or by contacting Sara Jackson at 410-209-5812 or sara.jackson@maryland.gov.
6. The Plan does not show that Mount Airy has conducted a point-in-time count to identify the total number of people experiencing homelessness in Mount Airy, and the Plan does not identify goals or actions regarding services for people experiencing homelessness. For information on DHCD's programs addressing homelessness, please see more online at <https://dhcd.maryland.gov/HomelessServices/Pages/GrantFunding.aspx> or contact the Homelessness Solutions Program Manager, Suzanne Korff, at 410-209-5850 or Suzanne.Korff@maryland.gov. Persons experiencing homelessness in Frederick County who need assistance should contact 301-600-1506. Those in Carroll County should contact 410-857-2999.
7. The Plan notes that 3.7% of the Town's households are below the poverty level. Mount Airy or non-profits active in Mount Airy may be eligible to apply for discretionary Community Services Block Grant (CSBG) funds administered by DHCD in order to provide services for low-income individuals and families at or below 125% of poverty. Planning staff can learn more about CSBG programs online at <https://dhcd.maryland.gov/Communities/Pages/programs/CSBG.aspx> or contact the Poverty Solutions Team at 301-429-7525 or csbg.dhcd@maryland.gov.
8. The Plan identifies a need for affordable "entry-level" housing, including workforce and low-income housing. If planning staff want to support further affordable housing development with Low-Income Housing Tax Credits (LIHTC) or other DHCD programs, information is available online at <https://dhcd.maryland.gov/HousingDevelopment/Pages/lihtc/default.aspx> or contact Edward Barnett, Director of Rental Lending, at 301-429-7740 or edward.barnett@maryland.gov.
9. Mount Airy's downtown has been designated as a Maryland Main Street. More information on the revitalization benefits associated with this designation can be found online at <https://dhcd.maryland.gov/communities/pages/programs/mainstreet.aspx>.
10. The Plan identifies a need to support businesses in the town's core. Info on DHCD's support for businesses can be found online at <https://dhcd.maryland.gov/Business/Pages/SmallBusinesses.aspx> or by contacting Mike Haloskey, Director of Business Lending Programs, at 301-429-7523 or Michael.Haloskey@maryland.gov.



11. The Plan identifies a need for infrastructure improvements that increase overall safety. DHCD's Community Health and Safety Works program is a potential resource to support these projects. More information on the program can be found online at <https://dhcd.maryland.gov/Communities/Pages/csw/default.aspx> or by contacting Eric Borchers, Project Manager, at 410-209-5833 or eric.borchers@maryland.gov.
12. The Plan identifies a need to increase energy efficiency for buildings, including single-family and multifamily homes. DHCD has several programs that support energy efficiency, and more information on those programs can be found online at <https://dhcd.maryland.gov/Pages/EnergyEfficiency/default.aspx>.
13. The Plan identifies a need to fill vacant commercial properties. DHCD's Project Restore can be leveraged to attract and retain businesses that occupy vacant properties. More information on the program can be found online at <https://dhcd.maryland.gov/Pages/ProjectRestore/default.aspx> or by contacting Kristin Dawson at 410-209-5847 or kristin.dawson@maryland.gov.
14. The Plan's Housing Element does not include an assessment of fair housing. Maryland House Bill 90 (2021) requires, effective January 1, 2023, that comprehensive plans include an assessment of fair housing. For technical assistance in development of the Plan's Housing Element, please contact staff at the Maryland Department of Planning.

We in the Division of Neighborhood Revitalization look forward to continuing our productive partnership with Mount Airy in its future initiatives. Again, thank you for the opportunity to comment on the Plan. If you have any questions regarding the comments above, please contact me at carter.reitman@maryland.gov or 410-209-5849.

Sincerely,

Carter Reitman
Project Manager
State Revitalization Programs

Cc: Joseph Griffiths, Maryland Department of Planning
Sara Jackson, DHCD Division of Neighborhood Revitalization
John Papagni, DHCD Division of Neighborhood Revitalization



MDE Comments for Environmental Clearinghouse Project

MD20240507-0318

Response Code: R-1

1. The plan should have more information on how climate change will impact the town and its residents and what measures the town is planning to take to address those impacts. Also there is no mention of sustainability initiatives and future actions the town has taken.
2. While there are mentions throughout the document on past, current, and future actions related to climate change and sustainability, they are scattered and difficult to follow. While not required, a section listing past, current and future actions related to these topics would be helpful.
3. 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.
4. 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.
5. 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.
6. 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.
7. 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.

8. Borrow areas used to provide clean earth back fill material may require a surface mine permit. Disposal of excess cut material at a surface mine may requires site approval. Contact the Mining Program at (410) 537-3557 for further details.



Town of Mount Airy 2023 Master Plan,
Frederick and Carroll Counties

Maryland Department of the Environment – WSA/WPRPP

REVIEW FINDING: R1 Consistent with Qualifying Comments
(MD20231215-0924)

Flooding

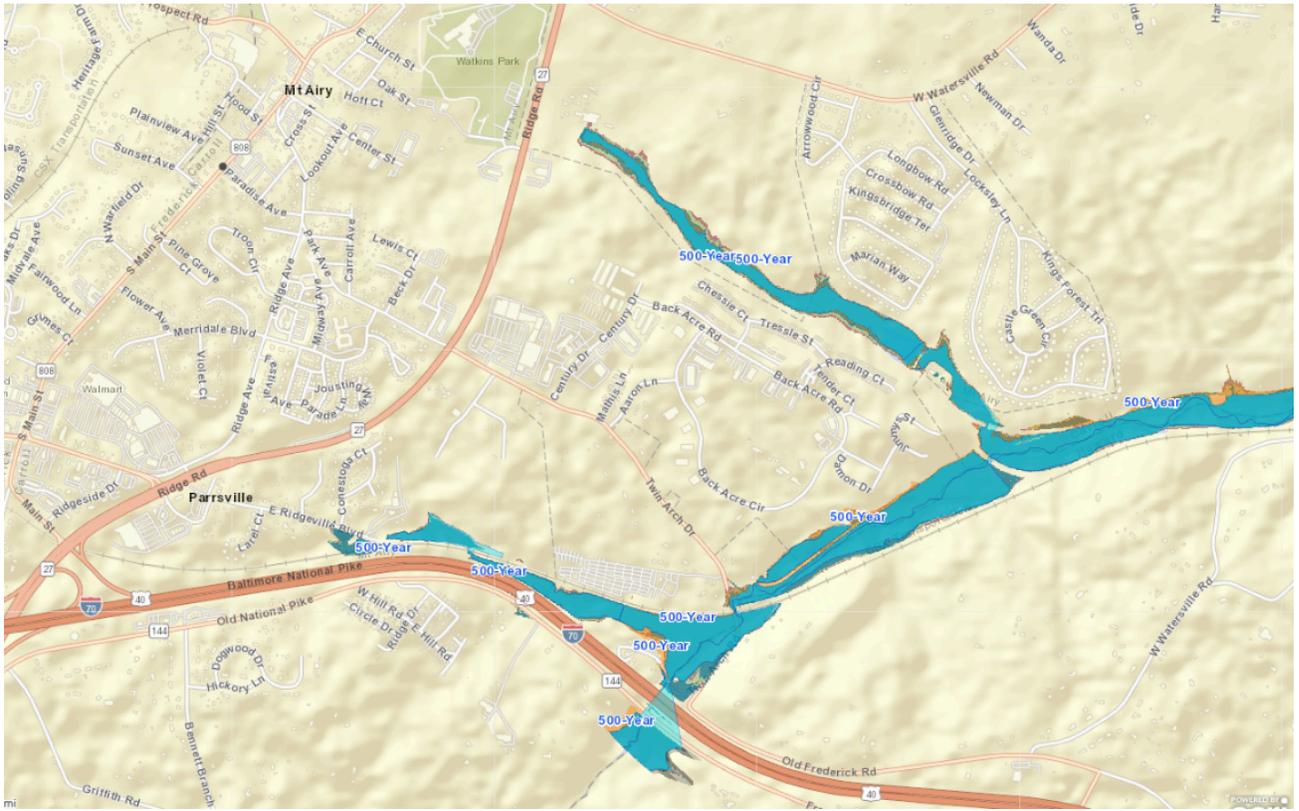
Please be advised, the property in MD20240507-0318 is in close proximity to Flood Zone AE (100-year Floodplain) and X (500-year Floodplain). The Town of Mt. Airy should follow local floodplain ordinances and Federal Emergency Management Agency's guidelines and standards.

It is advised that the Town of Mt. Airy consider climate resiliency, which could include but not limited to the following steps (<https://toolkit.climate.gov/>):

- Explore Hazards: Identify climate and non-climate stressors, threats, and hazards and how they could affect assets (people and infrastructure).
- Assess vulnerability and risks: Evaluate assets vulnerability and estimate the risk to each asset.
- Investigate options: Consider possible solutions for your highest risks, check how others have responded to similar issues, and reduce your list to feasible actions.
- Prioritize and plan: Evaluate costs, benefits, and capacity to accomplish each action integrating the highest value actions into a stepwise plan.
- Take action: Move forward with your plan and check to see if your actions are increasing your resilience with monitoring.

The Town of Mt. Airy is advised to contact Dave Guignet, State National Flood Insurance Program Coordinator, of MDE's Stormwater, Dam Safety, and Flood Management Program, at (410) 537-3775 for additional information regarding the regulatory requirements for Floodplains and Storm Surges.

The Town of Mt. Airy is advised to contact Matthew C. Rowe, CC-P, Deputy Director of MDE's Water and Science Administration, at (410) 537-3578 for additional information regarding Climate Change and Resiliency.



Tier II Waterways: No Assimilative Capacity

Direct any questions regarding the Antidegradation Review to Angel Valdez via email at angel.valdez@maryland.gov, or by phone at 410-537-3606.

Special protections for high-quality waters in the local vicinity, which are identified pursuant to Maryland's anti-degradation policy.

Anti-degradation of Water Quality: Maryland requires special protections for waters of very high quality (Tier II waters). The policies and procedures that govern these special waters are commonly called "anti-degradation policies." This policy states that "proposed amendments to county plans or discharge permits for discharge to Tier II waters that will result in a new, or an increased, permitted annual discharge of pollutants and a potential impact to water quality, shall evaluate alternatives to eliminate or reduce discharges or impacts." Satisfactory completion of the Tier II Antidegradation Review is required to receive numerous State permits, such as those for wastewater treatment, nontidal wetlands disturbance, waterways construction, and coverage under the general construction permit.

The Tier II review is applicable to all portions of the project within the Tier II watershed of **S Branch Patapsco River 1**. The Review consists of (1) a no-discharge alternatives analysis which considers if the activity can avoid any impacts to Tier II waters, i.e., an alternative site or strategic design, (2) a minimization alternatives analysis to limit associated water quality degradation, and potentially (3) a mitigation analysis to account for net loss of vital resources such as forest cover. If there is no assimilative capacity within the Tier II watershed identified above, additional social and economic justification for unavoidable impacts is required. No assimilative capacity means that new water quality data indicates that the Tier II stream segment has degraded below Tier II standards.

To ensure that essential information is provided to MDE when conducting the Tier II Review, MDE has developed forms to assist applicants in completing the no-discharge alternatives analysis, minimization analysis, and mitigation analysis. Adequate completion of these forms and accompanying Tier II report is required to successfully satisfy the Review and is necessary for State permitting and other approvals. A Tier II report template, which uses the information from the completed forms, is also available to help with document formatting and information organization. There are some activities that may require MDE permitting and approval but may not warrant additional Tier II review. Applicants are encouraged to review the Tier II Determination of No Additional Review Form and its applicability to the project before proceeding with the more detailed review analysis explained below.

[Determination of No Additional Tier II Review Form V1.1](#)¹

1. Code of Maryland Regulations (COMAR) 26.08.02.04-2 (G(1)) states that "If a Tier II antidegradation review is required, the applicant shall provide an analysis of reasonable

¹ https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_NoAdditionalReview_v1.1.pdf

alternatives that do not require direct discharge to a Tier II water body (no-discharge alternative). The analysis shall include cost data and estimates to determine the cost effectiveness of the alternatives”.

2. This form is for the evaluation of land disturbing activities such as those requiring a nontidal wetlands or waterways construction permit, or a general stormwater construction permit (NOI), to demonstrate that:

- a. the project is exempt from the no-discharge alternatives analysis; and
- b. the project consists of minor, unavoidable impacts to on-site streams, including stream buffers averaging 100'; and
- c. the project will not cause net forest loss in the affected Tier II watershed, or loss will be less than 1 acre; and
- d. all impervious surfaces associated with the project are treated with environmental site design practices, with existing structures with remaining capacity.

[Tier II No-Discharge Analysis Form V1.2:²](#)

1. Code of Maryland Regulations (COMAR) 26.08.02.04-2 (G(1)) states that “If a Tier II antidegradation review is required, the applicant shall provide an analysis of reasonable alternatives that do not require direct discharge to a Tier II water body (no-discharge alternative). The analysis shall include cost data and estimates to determine the cost effectiveness of the alternatives”.

2. For land disturbing projects that result in permanent land use change, this ‘no discharge’ analysis specifically evaluates the reasonability of other sites or alternate routes which could be developed to meet the project purpose, but are located *outside* of the Tier II watershed. Reasonability considerations, as applicable, may take into account property availability, site constraints, natural resource concerns, size, accessibility, and cost to make the property suitable for the project.

3. This analysis shall be performed regardless of whether or not the applicant has ownership or lease agreements to a preferred property or route.

[Tier II Minimization Alternative Analysis Form V1.2:³](#)

1. Code of Maryland Regulations (COMAR) 26.08.02.04-2 (G(3)) states that “If the Department determines that the alternatives that do not require direct discharge to a Tier II water body are not cost effective, the applicant shall: (a) Provide the Department with plans to configure or structure the discharge to minimize the use of the assimilative capacity of the water body”.

2. This form helps to ensure that water quality impacts due to the proposed project are comprehensively identified and minimized.

²

https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_NoDischargeAnalysis_Form.pdf

³ https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_Minimization_Form.pdf

3. To demonstrate that appropriate minimization practices have been considered and implemented, applicants must identify any minimization practices used when developing the project, calculate major Tier II resource impacts, consider alternatives for impacts, and adequately justify unavoidable impacts.

[Tier II Mitigation Analysis Form V1.0:](#)⁴

1. Code of Maryland Regulations (COMAR) 26.08.02.04-2 (G(3)) states that “If the Department determines that the alternatives that do not require direct discharge to a Tier II water body are not cost effective, the applicant shall: (a) Provide the Department with plans to configure or structure the discharge to minimize the use of the assimilative capacity of the water body”.

2. No net change in Tier II water quality is the overarching goal of the Tier II Review, and mitigation is an essential part of the analysis process to reduce cumulative degradation prior to justification of unavoidable impacts.

3. This form helps to ensure that alternatives to mitigate or offset unavoidable impacts to Tier II watersheds and streams are identified and properly implemented.

4. Mitigation and offsets are required before MDE can evaluate any social and economic justifications.

[Construction Stormwater Antidegradation Checklist - Version 1.3 :](#)⁵

1. To complete the checklist, applicants are required to coordinate with the County or appropriate approval authority when developing construction plans and stormwater management plans.

2. Applicants are required to provide this form when seeking a NOI/DOI for coverage under the General Permit for Stormwater Associated with Construction.

3. Applicants are required to submit a Tier II Letter of Completion before coverage under the General Permit for Stormwater Associated with Construction is granted.

S Branch Patapsco River 1, which is located within the vicinity of the Project, has been designated as a Tier II stream. The Project is within the Catchment (watershed) of the segment. (See attached map).

Additionally, there is no assimilative capacity in this Tier II watershed. This means that recent data indicates that sometime after designation, the Tier II stream segment

⁴ https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_Mitigation_Form_v1.0.pdf

⁵ <https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/Antidegradation-Checklist.pdf>

has degraded. Therefore, a social and economic justification (SEJ) may be needed for projects within this Tier II watershed. An SEJ must demonstrate that the benefits of a particular project outweigh the value of maintaining the high water quality of the Tier II watershed. SEJ documentation undergoes public review concurrently with any public review process associated with the relevant wetlands and waterways authorizations or NPDES permits. For more information regarding Maryland's Tier II Antidegradation Review and SEJ requirements, please visit:

<https://mde.maryland.gov/programs/Water/TMDL/WaterQualityStandards/Pages/Tier-II-Review.aspx>

Social and Economic Justification and the Tier II Report

1. Code of Maryland Regulations (COMAR) 26.08.02.04-2 (K). Components of the Social and Economic Justification states that “(1) Components of the SEJ may vary depending on factors including, but not limited to, the extent and duration of the impact from the proposed discharge and the existing uses of the water body. (2) The economic analyses shall include impacts that result from treatment beyond the costs to meet technology-based or water quality-based requirements. (3) The economic analysis shall address the cost of maintaining high water quality in Tier II waters and the economic benefit of maintaining Tier II waters. (4) The economic analysis shall determine whether the costs of the pollution controls needed to maintain the Tier II water would limit growth or development in the watershed including the Tier II water”.

2. The Tier II template is designed to give the applicant an outline to follow when submitting information for review that organizes the information from the forms, supporting narratives, other documentation, and identifies the basic information an applicant needs to provide to MDE to evaluate social and economic benefits of a project when there are still unavoidable impacts after minimization and mitigation.

a. [Tier II Report Template for PUBLIC entities](#)⁶

b. [Tier II Report Template for PRIVATE entities](#)⁷

Planners should be aware of legal obligations related to Tier II waters described in the Code of Maryland Regulations (COMAR) 26.08.02.04 with respect to current and future land use plans. Information on the Antidegradation Policy can be obtained online at:

<https://dsd.maryland.gov/regulations/Pages/26.08.02.04.aspx>

and Tier II Waters are located at

<https://dsd.maryland.gov/regulations/Pages/26.08.02.04-2.aspx>

⁶

https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/BasicTierIIReportTemplate_Public_nonlinearV1.pdf

⁷

https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/BasicTierIIReportTemplate_Private_nonlinearV1.pdf

Planners should also note as described in the Code of Maryland Regulations (COMAR) 26.08.02.04-2(B), "Compilation and Maintenance of the List of High Quality Waters", states that "When the water quality of a water body is better than that required by water quality standards to support the existing and designated uses, the Department shall list the water body as a Tier II water body. *All readily available information may be considered to determine a listing. The Department shall compile and maintain a public list of the waters identified as Tier II waters.*"

Additional Tier II resources are available on the Maryland's High Quality Waters (Tier II) website:

https://mde.maryland.gov/programs/water/tmdl/waterqualitystandards/pages/antidegradation_policy.aspx.

The public list is available in PDF from the following MDE website:

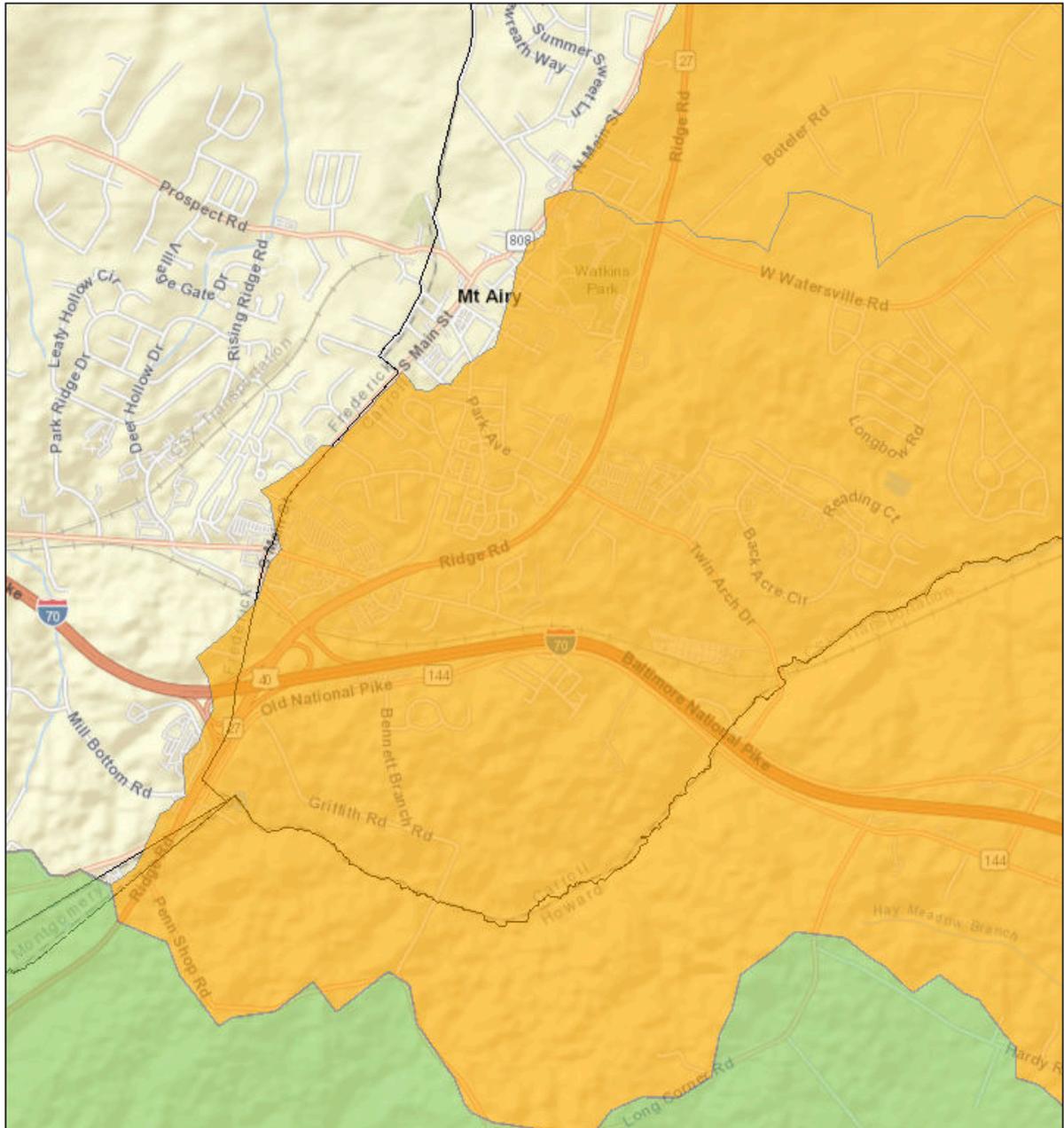
http://mde.maryland.gov/programs/Water/TMDL/WaterQualityStandards/Documents/Tier_II_Updates/Antidegradation-Tier-II-Data-Table.pdf.

The interactive Tier II webmap is located at the following website:

(<https://mdewin64.mde.state.md.us/WSA/TierIIWQ/index.html>).

Direct any questions regarding the Antidegradation Review to Angel Valdez via email at angel.valdez@maryland.gov, or by phone at 410-537-3606.

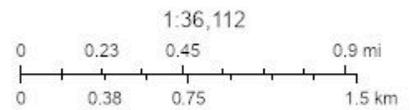
Mount Airy Master Plan Tier II Waters



5/8/2024, 10:27:02 AM

Tier II AC Catchments 2022

- Assimilative Capacity Remaining
- No Assimilative Capacity Remaining
- Tier II Stream Segments 2022
- Tier II Baseline Stations 2022
- Maryland County Boundaries



Frederick County, VITA, Esri, HERE, Garmin, INCREMENT P, NGA, USGS, Creator: Maryland Department of the Environment, Water and Science Administration (MDE WSA), MDE

Hi Brooks,

I reviewed the draft Mt. Airy comprehensive plan and had the following comments that I wanted to discuss with the group:

- I like that they are updating their design guidelines
- However, it looks like their rehab design guidelines are governed by the planning commission, when it should really be an historic preservation commission (per Title 8 of the Land Use Article), which has different expertise. As long as they are not trying to make local landmark designations (implement a historic district overlay) and administer that through the planning commission, though, it is confusing to have that arrangement but not necessarily in conflict with the enabling legislation. In that case the design guidelines would just be like any other architectural review mechanism that a planning commission implements.
- I recommend adding a map with the National Register historic district
- There is no mention of Heart of Civil War Heritage Area, although they are within the boundaries (but they do mention Main Street). We have heard from Adam that it's not necessary for each jurisdiction to specifically reference the heritage area management plans, but it's a good idea for local governments within the boundaries to reference the heritage area and the associated opportunities for funding to support heritage tourism.

Nell Ziehl
Chief, Office of Planning, Education and Outreach
Maryland Historical Trust
Maryland Department of Planning

Sent on June 5, 2024

Town of Mt. Airy – 2024 (Draft May 2024)
SHA Comments

June 03, 2024

Regional and Intermodal Planning Division (RIPD) General Comments:

- Please consider adding a table of contents.
- Please elaborate SHA at the first mention as “Maryland Highway Administration (SHA)”. Subsequent mentions can use abbreviation (SHA).
- Please make sure that all tables and figures have titles (i.e. Table 1, 2, or Figure 1, 2, etc.). For example, the Buildable Land and Potential Population Increase table on page 65 or Comparison of Physical Growth (acreage) and Population Growth figure on Page 19

RIPD Targeted Comments

Chapter One: Master Plan Purpose and Process

- P. 7 (line 93). There is a spelling error. It currently says “...4assesses” and should say “ 4 assesses...”
- P. 8 (line 102). After the word “facilities”, please add “to ensure safety of all roadway users.”.
- P. 15 (line 355). Please make reference to the 2023 Carroll County Master Plan (<https://www.carrollcountymd.gov/government/directory/planning-land-management/comprehensive-planning/land-use-functional-plans/transportation-master-plan/>)
- P. 18 (line 447). Please make reference to the 2023 Howard County Master Plan (https://www.howardcountymd.gov/sites/default/files/2024-01/HcBD_Chps_Appendices_Web_Reduced.pdf)
- P. 21 (lines 533-534). Please mention that Phase 1 of the project was completed in 2023.

Chapter Two: Town History and Current Regional Setting

- P. 27. The map graphic is blurry. Recommend using a clearer photo with labels. Also, line numbers seem to be embedded and shifted behind the right side of the image. There is no need to see line numbers in the image.
- P. 30. The map graphic is blurry. Recommend using a clearer photo with labels. Also, line numbers seem to be embedded and shifted behind the right side of the image. There is no need to see line numbers in the image.
-

Chapter Four: Land Use and Zoning

- Page number seems to be inconsistent from the beginning of Chapter 4. It goes from Page 59 in the last page of Chapter 3 to 55 again in Chapter 4.
- P. 56 in Chapter 4 section (line 1508). Please limit the significant figures to two.
- P. 65. The “approximate vacant land (acres)” column total is not correct in the Buildable Land and Potential Population Increase table.
- P. 65, in the Buildable Land and Potential Population Increase table, make sure the numbers in each column are aligned in the same vertical line. It seems that some numbers are shifted to right and left when looking at each column.

- P. 65, in the Buildable Land and Potential Population Increase table, make sure the units are the same for the allowable density column. Some are listed as du/ac some as du/acre and one is listed as du/3ac. Please revise and be consistent.
- P. 68-71. Consider using one unit of measurement for the acreage column in the Parcel tables – currently some numbers are in acres and some are in square feet.

Chapter Five: Municipal Growth Element

- P. 83- 104. There is a gray box on the right- hand side of the page (likely associated with track changes) that should be removed.
- P. 87. Please consider using one unit of measurement for the Proposed Properties for Redevelopment (acres), for clarity.

Chapter 6- Transportation

General Comments:

- There are several notes about sidewalks and pedestrian access. For all roadway and sidewalk improvements to SHA roadways, please provide and maintain bicycle facilities as well as full ADA-compliant pedestrian facilities. Additionally, all improvements to SHA roadway facilities should provide and maintain full ADA-compliant access to existing and future transit facilities.

Targeted Comments:

- P.112 It is recommended to change Figure 1 to a table. Also, consider re-numbering the figure number as there have been many figures prior to this figure. Please be consistent with the figure and table numbers.
- P.113 (lines 2915-2918). Please specify that the segment of MD 27 from Mill Bottom Road to Main Street and north of Leishear Road are part of the Historic National Road Scenic Byway.
- P. 113 (lines 2928-2934). Please specify that the segment of MD 808 from Prospect Road to Leishear Road as being part of the Old Main Streets Scenic Byway.
- P.114 (line 2945). Please specify that Ridgeville Boulevard (extending to the west) is part of the Historic National Road Scenic Byway.
- P.115 (lines 2984-2986). Please specify that Prospect Road (extending to the west) is part of the Old Main Streets Scenic Byway.
- P.117 Please use a consistent format, font, and border shape for all tables throughout the document. Each table seems to be different in terms of formatting.
- P. 117 (line 3056). After Traffic Impact Studies are analyzed by Town staff and traffic engineers, please add “and reviewed and approved by SHA District 7”.
- P. 117 (line 3057). After “are functioning adequately”, add “and if mitigation efforts are needed”.
- P. 117(line 3064). The TIS’s/TIA’s mentioned are not recent. Consider saying “previous” instead.
- P 119 (Table 4). What is the source of this data? Please cite the source.
- P. 121 (line 3134-3139). Consider mentioning the breakout project, which includes a pedestrian crossing at Center Street. SHA District 7 plans to continue coordination with the Town to implement improvements at this intersection, as warranted by future development.
- P. 121 (line 3156). Scheduled to begin what? Design? Construction? Please clarify.
- P. 122 (line 3200- 3204) -The State’s fiscally unconstrained Highway Needs Inventory (HNI), includes projects that are critical to Maryland’s transportation needs. The HNI includes a divided

highway reconstruction project along MD 27 from Frederick County Line to MD 808A. It is recommended that any future improvements account for future highway reconstruction and widening along MD 27.

- P. 123 (line 3238 – 3242). Please note that a portion of MD 27 (from Mill Bottom Road to MD 144) and MD 144 (extending to the west), are included as part of the SHA Bike Spine Network. It is recommended that any needed roadway improvements on these roadways include appropriate bicycle accommodation. Any work performed on or adjacent to the SHA Bicycle Spine Network should safely accommodate bicycle access throughout construction. In the event that this is not feasible, an alternative plan that will minimize bicyclist roadway use obstruction must be approved by SHA.
- P. 123 (line 3238-3242). Consider mentioning various state programs to improve and enhance bike and pedestrian accommodations:
 - Transportation Alternatives (TA) Program: a reimbursable, federally funded program for local sponsors to complete transportation-related community projects designed to strengthen the intermodal transportation system. The program provides funding for projects that enhance the cultural, aesthetic, historic, and environmental aspects of the intermodal transportation system. The program can assist with projects that create bicycle and pedestrian facilities, restore historic transportation buildings, convert abandoned railway corridors to pedestrian trails, mitigate highway runoff, and other transportation related enhancements. Project sponsors are required to provide a minimum 20% of total project cost as a match.
 - Recreational Trails Program: a federally funded program MDOT SHA administers on a reimbursement basis. Like the TA Program, the Recreational Trails Program may reimburse a local project sponsor up to 80% of the project's total eligible costs to develop community-based, motorized and non-motorized recreational trail projects.
 - MDOT's Kim Lamphier Bikeways Network Program: allocates State transportation funds administered by MDOT The Secretary's Office (TSO) to promote biking as an alternative transportation mode. Similar to the TA and Recreational Trails programs, Bikeways grantees are required to provide a minimum 20% of total project cost as a match. The matching fund contribution can be in the form of cash, an in-kind contribution, or a 3rd party contribution.

Chapter Seven: Community Facilities and Public Services

- P. 134. The table is not labeled (see general comment) and please clarify the rationale for the numbers that are highlighted.