Attachment B

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PlanMaryland
Summary of Detailed Comments
June 22, 2011

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Overall

This is an almost impossible document to navigate, in part because of duplicated language that obscures what topic is being addressed. At least in regard to Transportation, there's also no straightforward connection to existing Master Plans, mission statements, goals, and objectives for the State agencies outside the Department of Planning who would most clearly be responsible for carrying out PlanMaryland. Where changes need to be made to those documents, they should be clearly stated.

For a plan than deals at its core with Smart Growth this document seems to sprawl. For example, water resources issues are dealt with in many different places throughout the plan. This means that the reader must read the entire document to form a complete picture of what the Plan is trying to say about water resources. This is difficult, not only because of the time it takes, but also because of all of the other issues that are similarly scattered throughout the document that the reader is trying at the same time to pull together to form a coherent whole. To deal with this the following approach is recommended for a more useful and effective document:

The essentials of PlanMaryland in terms of the Goals, Objectives, Needs (and impediments), Policies, Approaches, and recommended Actions should be distilled, summarized, and placed immediately after the Executive Summary. This would not amount to an expanded Executive Summary, but rather a short version of the entire Plan which would refer to supporting information. The supporting material can then follow in subsequent chapters, or perhaps within an appendix. This will allow readers who want the "bottom line" to get it fairly quickly, while readers who also want the details can get those as well. And readers who want the details will be better able to appreciate and understand them because they will already know what the "bottom line" of the Plan is.

Trends (chapter 2): This is the problem statement chapter. It presents valuable information on a variety of demographic, economic, land use, and transportation, etc in the state. However, this chapter does not always explain why the trends are important to the Plan.

- For example, the section on Maryland's population (page 2-4 to 2-5) states that the total population and number of households in Maryland are increasing. The section does not indicate why this is important to PlanMaryland. It can be inferred that an increasing population will require additional housing and will increase pressure to develop in the Priority Resources Areas, but this should be explicitly stated.

- For example, the section on Maryland's industrial base (page 2-8 to 2-9) indicates that there is a shift from heavy industry to more high-value, advanced technologies. It is unclear why this is important to the goals in PlanMaryland.

Visions, Goals, Objectives (chapter 3)

- Page 3-7, Section C., 1st paragraph: The Plan states that the three goals "...do not articulate the desired public outcomes that give the goals form and substance. That is the purpose of the Plan

objectives..." However, the purpose of a goal is to describe a desired outcome and to focus on ends rather than means. The purpose of an objective is to describe how to achieve a goal. They should be attainable, measureable, and time specific. The objectives in this section are written as desired outcomes, and therefore are goals.

- Potential objectives for Goal 1 / Transportation are:

    o X% of residents will live within a ½ walk of a transit stop / station by 20XX.

    o X% of residents living in the growth area will use a non-auto driver mode to travel to work by 20XX.

    o X% of employees working in the growth area will use a non-auto driver mode to arrive at work by 20XX.

Metrics (chapter 6):

- Metrics should be tied to the objectives of each goal.

- For example, one metric in Goal 1 is the "number and percentage of new housing units permitted and newly subdivided acreage recorded annual inside and outside of PFAs...". The objective could be "XX% of new housing units will be permitted inside of PFAs between 2011 and 2016."

Chapter 4 identifies eight Designated Places and Planning Areas and identifies numerous objectives for each. It is unclear if the objectives for each designated place and planning area are intended to achieve the goals of the Plan or if they are criteria to help local governments add or remove designated places from the maps. If the former, then the objectives should be the same as those of the Plan. If the later, than this needs to be clearly stated.

Possible Actions (chapter 5): It is unclear why there are "Transportation" and "Major Public Works" sections in Chapter 5. Consider including this chapter as an appendix.

Oversight and Management (chapter 6): one of the duties of the workgroup should be to monitor the extent to which the objectives are being achieved.

The Plan mentions a number of times how important it will be for all stakeholder agencies, both State and local, to be engaged and involved to fulfill the Goals and Objectives of the Plan. In going through the document, however, it is not clear enough what the various roles are how they will help to accomplish the Goals and Objectives.

- Other State stakeholder agencies, such as MDE and DNR, should have their roles clarified, especially in terms of how the Policies and recommended Actions will be implemented.

- Although a State-level planning document cannot get into the details of local government implementation, the important connections, needs, impediments, and recommended actions of the Plan with regard to the role of local governments, need to be made more clear.

It would be useful if the Plan could include some sort of triage approach to prioritize and stage the actions that are needed to achieve the goals and objectives of the Plan.

Redevelopment appears to be aptly covered in the text. The Plan defines the use of infill as a viable means of redevelopment and takes into consideration its importance as an economic development tool.

The Plan provides clear language that addresses the issues of social equity, education but provides very little in the way of comprehensive recommendations for safety. Additionally, it may better serve the community to have separate sections that deal with these issues. The Plan needs to address the issue of safety in more precise language rather than the blanket statement "reduce violent and non-violent crimes". Additionally, the Plan only addresses the issue of the disenfranchised and lower income communities specifically in reference to education and environmental justice. I would suggest that this community would also need specific recommendations as they relate to safety and access to food, recreation and transit.

How will state programs be divided between those considered as fostering growth (that can be used in growth print areas) and those that are considered as maintenance and conservation (that can be used by established communities)?

The thesis to my comments, if there is one, is that historic preservation shouldn't be characterized as a desire to curate and seal in amber certain precious historic resources. Rather, where appropriate, historic resources should be viewed as central to opportunities for effective redevelopment (see many of the side-bar examples throughout the document). Certainly there are some historic communities that should be mapped as "Established Communities," where large-scale redevelopment is not encouraged, but elsewhere historic resources should be a catalyst for revitalization, and viewed as such in PlanMaryland.

At a first glance, the Land Use in the PlanMaryland document from a master planning perspective reflect what we are doing here in Montgomery County. Impact to M-NCPPC-MC:

- Possible impact on data collection and reporting
- Long-term planning vision for the County, work program, and Priority PlanMaryland mapping need to be aligned in order to maximize opportunity for funding under this initiative.
- Future agency plans need to reference PlanMaryland and state how they meet the objectives as defined in PlanMaryland.

It appears that—at least in terms of economic development—the Plan would have the greater impact on other counties in the state: especially jurisdictions in Western Maryland, the Eastern Shore, and exurban counties—i.e. jurisdictions on the outer ring of the DC and Baltimore metropolitan areas.

The background information should recognize that some development will always occur outside PFAs regardless of local efforts. This occurs when property owners decide to pursue development allowed by right in these less dense areas. Halting all development outside the PFAs is unlikely unless development moratoria are adopted. Most of this development in Montgomery County involves clustering with large amounts of open space, parkland or agricultural land preserved. Some way should be developed to account for this aspect of development, rather than combining it with other development in this undesirable category.

Attachment B

Map

Provide methodologies for each of the Designated Places. For example, it is unclear why White Flint is not included. As the location of a major redevelopment in Montgomery County, that will absorb a significant amount of growth, the White Flint Sector Plan area should be included. The GrowthPrint methodology needs to be revised so that the White Flints are included.

It appears that the public and privately owned lands under permanent conservation protection shown on the PlanMaryland map for Montgomery County do not include the Forest Conservation Easement Category I and II. A GIS layer can be provided to the State for inclusion. A map showing the county easements is shown below.

LEGEND
Category I Forest Conservation Easement
Category II Forest Conservation Easement
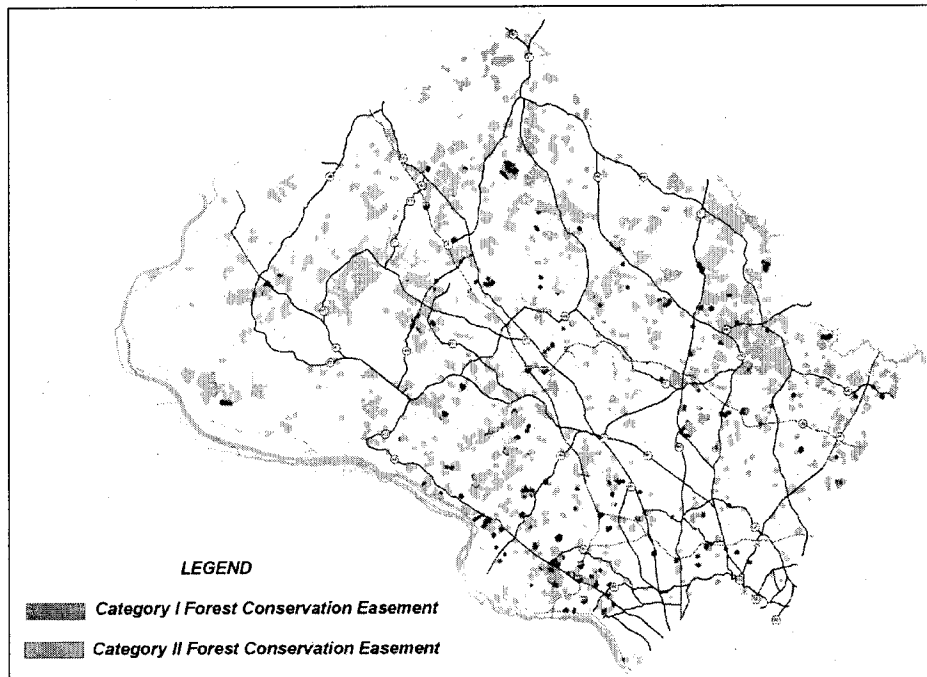
The map appears to contradict the definition of established communities in the text. I would argue that based on the definition provided by the text that Silver Spring and Bethesda are both established communities whereas the map only defines Bethesda as such. The accuracy of the map is key as it will more than likely be the primary tool for interpretation of the Plan.

However, I would like to see more information on the methodology used to determine established communities in the PFA's as it would assist in determining the accuracy of the map.

Allow state funding for the rehabilitation and heritage improvements of historic/cultural resources on parkland located outside GrowthPrint and PFAs, as approved and encouraged under the 2002 Montgomery County Heritage Areas Management Plan or its amendments. Cultural resources are not confined neatly to target investment areas. Prehistoric resources may be found near major waterways and/or rock outcroppings. Industrial historic resources may be found along canals and railroads. Other built historic resources can be found on farms, in cities, and in suburbs. The state should be able to

respond to funding needs for cultural resource stewardship regardless of geographical limitations, as long as those cultural resources meet any of a number of standard criteria of significance.

The Greenprint and Water Resource maps are not yet finalized, so it is not clear how we will be affected.

Chapter 1: Introduction

Page 1-4: Ensure that at a minimum, GrowthPrint areas include all Urban Districts and Business Districts as defined by Section 21-101 of the Maryland Vehicle Law, as well as Bicycle Pedestrian Priority Areas, as defined by Section 8-101.

Page 1-5, Expectations: This section states that local APF ordinances discourage growth in suitable areas. MDP should identify where they think that requirements are inappropriate. If APF is evenly applied, are they suggesting that the areas outside the core pay for the impacts of development inside the core? MDE's new requirements for SWM have been criticized for making development in these core areas more difficult. If there is a shift in responsibilities for paying for public facilities, there needs to be a measurable way to justify that shift.

Chapter 2: Trends and Land Use Implications

Page 2-3: Recommend not saying that "high-divorce rates" are producing smaller families. The real phenomenon is the higher incidence of "single-person households" or persons living alone. We don't know whether that is the result of aging, divorce, or choice. I recommend the following:

"The aging of the baby boomers, delayed ~~marriage and child-bearing, and high-divorce rates continue to produce smaller household sizes and~~ [household formation, fewer children per household, and an increase in non-traditional and single-person households] affect housing preferences, infrastructure needs…"

Page 2-4, top two paragraphs: They seem to look back too much at what has been the case and give short shrift to current trends in people moving back to cities. Large retailers are following them and in the process are changing their building type to be part of mixed-use developments that are less car-oriented, e.g. Walmart and Giant, who are both proposing such projects in DC.

Page 2-4: Same comment as for page 2-3 for third sentence in last paragraph: "The combination of aging…"

Page 2-5: Plan Maryland gets the trend right but then makes the wrong recommendation.

Yes, many seniors plan to remain in place as they retire. The correct finding is not to provide more generic senior housing into these neighborhoods, as is implied in the last paragraph. The finding should instead point to the need to create:

1. More neighborhood-based support to enable seniors to live independently for as long as they want.
    - Implementation strategies: technical assistance for communities that want to develop Naturally Occurring Retirement Communities and grants for some types of special community center modifications or rehab to accommodate itinerant health and social services.

2. More affordable assisted living or nursing facilities—such as neighborhood group homes, so that these seniors, who will only move from their homes when they are no longer able to live independently, can stay in the neighborhood.

- Implementation strategies: state overlay zone to allow adult day care facilities and group homes in NORCs and to fast-track approval process for affordable assisted living and nursing group homes.
- Measurements: number of organized NORCs, number of adult day care facilities and assisted living/nursing beds in NORCs.

Page 2-8: Plan Maryland goes right up to the need for transit oriented development and then stops. Instead of talking about remaking the suburbs at the end of the third paragraph, Plan Maryland must discuss the need to create attractive urban (or urban-lite) communities around transit, which means repositioning the TOD product as the center of a thriving community.

Page 2-8: A graphic should be shown about where the old businesses are dying and where the new ones are being established, with the symbols sized for the numbers of jobs lost/created.

Page 2-8: Local government should adopt Smart Growth policies to be eligible for State funding.

Page 2-8: As the population of the suburbs has increased, the percentage of State highways in those areas has not kept pace, skewing SHA's responsibility for maintenance away from GrowthPrint areas. (see me for more details)

Page 2-11: Something should be said about the average size of homes being reduced and the expectation that this will continue. If the overall trend is that there will be an oversupply of large houses in the future, what are we going to do with them?

Page 2-16: This section is a little screwy since the PFA's were determined mostly by where existing development and facilities already were.

Page 2-19: TOD is touted as being a solution because it reduces vehicles and vehicle trips, but they haven't shown them to be the problem yet in the document.

Page 2-21: Since they've already used MoCo as a new TOD example, they should discuss the percentage of people that live within walking distance to transit now and the high percentage of people here that already use transit.

Page 2-22: Is such a map really useful? If you live 10 miles from commuter services, you're already living too far away from your job. The only way you're going to get on a bus or train after driving ten miles is if you're living really far away.

Page 2-23: Plan Maryland is missing a discussion of the fact that the cost of housing includes the cost of the commute. Recommend that this fact be included on page 2-23. It must become state policy to consider the cost of the commute as part of the cost of housing. Incorporate this into its funding of affordable housing developments and in site selection, as well as in transit decisions. In the 2006 report "Heavy Load" the Center for Smarter Growth, stated that working families face the conundrum between

housing versus transportation costs. This kicked off the acclaimed agreement between HUD, EPA, and FDOT to promote understanding that, among other things, the cost of housing INCLUDES the cost of the commute. "DRIVE 'TIL YOU QUALIFY" is an option used by many Working Families seeking affordable housing by moving to far-flung suburbs. ... At some distance, generally 12 to 15 miles, the increase in transportation costs outweighs the savings on housing—and the share of household income required to meet these combined expenditures rises. "

(See http://smartergrowth.net/anx/ index.cfm/3,172,663/pub_heavy_load_10_06.pdf, p. 5.)

Page 2-24: The solution is more than just giving people more options, it's also encouraging them to make the choice that has the least detrimental impact to everyone else.

Page 2-27: Acreage preserved by Maryland Environmental Trust (MET) easements and other County easement programs could be included here for context.

Page 2-36. The 2008 report, Water for Maryland's Future: What We Must Do Today, is mentioned. This report covers much more than water supply, so this report should be discussed up front as part of a more general discussion of water resources. As part of a more general discussion, the Recommendations of the 2008 report should be listed.

Page 2-39: Individual Septic Systems. This section makes an excellent case for limiting development and resultant nitrogen pollution in areas without community sewer such as the Agricultural Reserve. However, it does not address the potential concomitant threat of extending sewer into these areas as the response to nitrogen pollution from septic fields.

Page 2-45, after last word in 1st sentence under Impacts of Air Pollution on Water Quality insert: "either directly onto water or onto impervious surfaces"

Page 2-45, after last sentence before Figure 2-19 under Impacts of Air Pollution on Water Quality insert: "Because of the wide distribution of contributing sources, some air pollution is from local and State sources, and some originates from out-of-State sources."

Chapter 3: What are the Visions, Goals, and Objectives that will Guide PlanMaryland

Page 3-3, Quality of Life: This statement is more about sustainability of the environment than it is about people and therefore duplicates #9 Environmental Protection. Something needs to be said about public health.

Page 3-3, Community Character: The existing community character might be lousy.

Page 3-3, Transportation: A clause needs to be added that says, "and minimizes the need to drive on a daily basis to places of employment and other regular destinations." Right now, the statement could be read to support continuing the status quo.

Page 3-3, Housing: The same goes for this section. Do we really want to encourage having McMansions as an option for the rich?

Page 3-3, Economic Development: I don't understand why we're promoting natural resource-based businesses. I don't see that as applying to biotech, which is one of our strengths, or other tech businesses, management firms, legal firms, etc.

Page 3-9, Transportation Choices: Add the following, "All towns, cities and rural centers that are targeted for development or redevelopment are designated as Bicycle-Pedestrian Priority Areas to facilitate the enhancement of pedestrian and bicycle accommodation and safety, as well as access to transit."

Page 3-10, 1st bullet under Goal 2, at end of 2nd sentence insert:", Environmental Site Design, and agricultural Best Management Practices"

Page 3-10, 2nd bullet under Goal 2, make the following changes: "To the maximum extent possible, mitigate, restore and enhance already compromised ~~nature~~ [natural] resources and environmental sensitive areas, where possible through appropriate development[,] ~~and~~ redevelopment[, and retrofit] activities."

Chapter 4: PlanMaryland Process

General Comments

Generally, it is not clear to me from reading Chapter 4 what the implications of designation would be, e.g. whether this would in any way change or enhance the potential funding or tools available to support growth in areas already designated as TODs.

Specific Comments

Maybe consideration should be given to extending water into some of the rural areas that have a substantial amount of residential lots to provide fire water supply. For the rural fringes such as RE-2, RC and R septic/well lots, water service extension might be a good strategy to reduce their completion for water needed for agricultural uses.

Page 4-4: "Designated Places for Growth and Preservation and Other Planning Areas": Map and classify to clarify which objectives are desired in which areas. Establishes dichotomy: designated places for growth v for conservation. Oh, or "stability and sustainability"

Page 4-7 (table 4-1): The column entitled "Primary for Presevation or Protection" should include "Restoration" as restoration of these areas is mentioned in various locations throughout the document.

Page 4-7 (table 4-1): Add a column that indicates those categories that are "Designated Places".

Page 4-7: Table Heading "Primarily for Maintenance or Conservation": Not all designated historic resources should be for "maintenance" or "conservation". This may be appropriate for predominantly residential historic districts, but may be inappropriate for predominantly commercial historic districts. Individual historic sites may be engines for redevelopment. Some historic resources might support GrowthPrint objectives

Page 4-9: The "These State programs" sentence reads weirdly, especially "the National Register of Historic Places." Locally designated historic resources should be added to this list.

Page 4-10: If White Flint or any other our master planned metro station areas are not within the "red" areas, then fix that.

Page 4-12: More needs to be done than "maintain and enhance" the existing transportation system if this is where we're going to put new development since the Established Communities section says the same thing. An increase in transit facilities is needed, not just encouragement for folks to use what's there. Maximizing ped-bike access to transit is good, but more forcefully, ped-bike access should be prioritized.

Page 4-13, 1st sentence under (5) Natural Resource Conservation: insert "and water" before "quality"

Page 4-13 (5) - Natural Resourc Conservation: In the GrowthPrint areas it is mentioned that there should be an "emphasis on air quality improvements". Added to this should be "water quality improvements" as new and redevelopment projects will have to comply with new stormwater regulations and other environmentally sensitive designs resulting in improved water quality within the GrowthPrint.

Page 4-15: I am concerned about the following language on 4-15 describing a criteria for designation as a growth print area: "Supported by an adopted local comprehensive plan that includes a goal to concentrate the vast majority of the jurisdiction's future non-resource-based residential, business and employment growth in the GrowthPrint area by 2030." I am having a hard time imagining us ever adopting a sector plan that includes a goal to concentrate the "vast majority" of the county's growth to a particular area. I would suggest that "vast majority" is too limiting here—this may work for a municipality with planning power or a county with few growth opportunities, but seems that it would not work when applied to us. Are there several GrowthPrint areas in Montgomery County or just one?

Page 4-17 (11): Global Warming & Climate Change: As written statement suggests energy efficiency improvements of existing buildings and infrastructure. Paragraph should include the construction of energy efficient new buildings.

Page 4-21: the third bullet indicates that local plans must have goals to protect at least 80% on the undeveloped land remaining. Is this realistic given the mapped area for AgPrint?

Page 4-22: Consider adding restoration/mitigation as one purpose for designating preservation and conservation areas. Restorated and mitigated lands may have a potential for exceptional resource benefits and migratory connectivity.

Page 4-24 GreenPrint allows redevelopment limited to resource-based economic development and accompanying residential development. Who will determine what this is?

Page 4-29, 1st sentence under (5) Natural Resource Conservation: replace "the limited" with "limitations on"

Page 4-32 thru 34: The Natural Resources section allows for all uses, including a full range of agriculture, but limits housing to that needed for resource-based industry. Also, there is no target, like the 80% for agriculture.

Page 4-33, 1st sentence under (5) Natural Resource Conservation: replace "the limited" with "limitations on"

Page 4-43 (11): Global Warming & Climate Change: In addition to resource mitigation & water quality improvements, global warming & climate change must be addressed through multiple mechanisms including the implementation of LID tools to treat and store runoff as well as providing habitat (through planting).

Page 4-43, 1st sentence under (5) Natural Resource Conservation: replace "the limited" with "limitations on"

Pages 4-45 and 46: The terms "Sufficient size and configuration of land" should be defined.

Page 4-47, Policy 2.1: Add, "while meeting the principles of Universal Design."

Page 4-47, Approach 2.1: Add, "Prioritize pedestrian, bicycle, and transit access in Bicycle Pedestrian Priority Areas, Urban Districts, and Business Districts (as defined by Section 21-101 of the Maryland Vehicle Law) in both the construction of transportation facilities as well as their operation.

Page 4-48: Policies/strategies for Water, Sewer, Schools and other Public Facilities should also be considered for the following:

- Funding sources for maintenance and improvement of infrastructure in redeveloping areas.
    - o Contribution to public infrastructure made by individual projects doesn't cover all the improvement costs
        - There are fewer new developments in existing developed areas
        - The costs for necessary improvements can be higher than the tax revenues set up to cover them, which in turn can lead to existing development having to pay more to offset them.
        - Because of high costs, certain improvements (e.g., undergrounding of overhead power lines) aren't even required for the new developments since their individual site frontages are so small.
- Resolving competition for space in urbanized areas
    - o We want infrastructure (roads, stormwater management facilities, and wet/dry utilities) to share the same rights-of-way, but the individual space needs of each exceed the total available
        - Need to have a policy to encourage coordination as early as possible in the planning process
        - Should rights-of-way that contain essential infrastructure only be under public management, rather than private, to ensure consistency in how they are provided and maintained?
    - o Public sites should be used for multiple purposes (e.g., school facilities shared for park, recreation, theatre and other gathering uses)

Pages 4-50 and 4-51: I was disappointed to see that the text is specific about industries (life sciences, tourism, etc.) but contains no reference to small businesses generally. I think that we should focus more on the people who are already here rather than on some decision to commit to specific industries.

Page 4-51 & Page 4-52, Approach 7.1: Add a bullet, "promote the use of Universal Design as a standard practice."

Page 4-52: improve the dependability[, safety, accessibility,] and affordability of transit services.

- Add "accessibility." Currently only able bodied persons can easily use transit and even able-bodied persons often have difficulty getting on and off MARC, especially if we have anything other than a backpack to carry on. Unlike Metro, most MARC platforms are not flush with the entrance thresholds. Additionally, many buses refuse to lower the wheelchair ramp for persons with canes, etc. Plan Maryland must discuss disabilities with a clear explanation that they are not limited to retirees. Many workers are disabled, either for a short term (leg break, ACL injury, bunionectomey, etc.) or permanently. Metrics would include: percent of MARC platforms on same grade as the doors of the train. downtime of elevators or escalators throughout the system; and number of uncovered kiosks for buses, trains, etc.

Page 4-52: reduce potential health risks related to air and water pollution in disenfranchised communities.

- One of the best ways to do this is to clearly establish that multifamily structures, especially publically subsidized ones, are not used to "buffer" single-family households from highways, STPs, drainage ponds, etc.

Page 4-54: "Explore policy and funding options for preservation of land that will support local food production in urban as well as rural areas." This is an emerging trend in many States, including California, and should be encouraged.

Page 4-62: "State Designation." This appears to be a variation of the State's current accreditation procedures which apply to the Agricultural Reserve.

Chapter 5: Possible Actions

Page 5-3, #5: Add, "Work proactively with local jurisdictions to designate Bicycle Pedestrian Priority Areas to assist in the prioritization of bicycle and pedestrian facilities in these areas. Ensure that the facilities that are built meet the principles of Universal Design and best engineering practices to the greatest extent possible."

Page 5-5, Possible Actions to achieve Goal 2, Insert the following Action: Implement the Recommendations contained in the 2008 report—Water for Maryland's Future: What We Must Do Today

Page 5-5: #5." Establish policies and procedures that address the use of State funding for road projects that expand highway capacity outside of growth areas or that encourage longer distance commuting". The wording here is ambiguous. It could be construed to be in conflict with information on page 4-23. "Ensure that transportation infrastructure in rural areas meets the needs of rural residents and resource-based industries, and does not undermine conservation objectives by encouraging incompatible development." It should be amended to clarify that the intent is to preclude expansion of highway capacity and long distance commuting from rural areas.

Page 5-6: #8. There should be a reference to off-site septic easements as long as they are legally permitted.

Page 5-6: #9. A State Bill has been introduced to limit subdivisions that use on-site septic systems to no more than 5 lots. However, this would not preclude the possibility of multiple 5 lot subdivisions being located on the same farm for no net benefit in pollution reduction.

Page 5-9: The words "pedestrian", "sidewalk", "crosswalk", "bike", "bicycle", and "intersection" do not appear anywhere in this section, which reflects the Possible Actions in Transportation.

Page 5-9: As with much of the document, there's too much meaningless verbiage, exemplified by the opening sentence, "Maryland has a storied history of transportation planning....." Bulleted actions should include:

- Increase the percentage of State-owned roadway centerline miles within GrowthPrint areas with a Bicycle Level of Comfort (BLOC) grade of "D" or better to 90% by 2023.
- Increase the percentage of State-owned roadway centerline miles within GrowthPrint areas that have ADA-accessible sidewalks to 98% by 2023. Increase the percentage of these sidewalks that meet ADA Best Practices and SHA's Bicycle Pedestrian Design Guidelines to 90% by 2023.
- Designate Bicycle Pedestrian Priority Areas in all Growth Print Areas in consultation with local jurisdictions.

Chapter 6: Oversight, Management & Metrics

General

The oversight and management chapter includes several references to aligning funding and coordinating programs to achieve the goals and objectives of the plan, but it could go further. If local governments could apply for assistance on planning or projects that meet the objectives of the Plan, then state programs should be available as a block to fulfill those needs.

Specific

Page 6-11: Goal 1. Because use of transit is key to smart growth, and because transit investment requires a certain density, a metric for concentration of population should include number or percent of housing units within a short walking distance (1-2 mile) of transit.

Page 6-11, Metrics for the Three Goals: More metrics are needed for the three Goals, especially for Goal 2.

Page 6-12: Goal 3. Homes sales and Affordability. Must include the cost of the commute into the cost of housing. Suggest standard factors based on percent of HH by income by method/miles/time of the commute. This must be done BEFORE the sales-per-income category is calculated.

Glossary

Page G-1, Glossary: Add the terms Bicycle Pedestrian Priority Area - as defined by Section 8-101 of the Maryland Vehicle Law; and Urban Districts, and Business Districts - as defined by Section 21-101 of the Maryland Vehicle Law.

Page G-3: weird definition of "historic area". Suggest replacing with: "Historic Area: means a historic district or site determined by an authority to merit designation in the National Register of Historic Places or under a locally adopted historic preservation ordinance due to its architectural, historical or cultural significance."

Page G-4: weird definition of "preservation". Suggest replacing with: "Preservation: add the following: Historic Preservation may include the process of making possible a compatible use for a property through repair, alterations, or additions while preserving elements essential to convey historical, architectural, or cultural significance, or the process of sustaining or restoring features to maintain its historical, architectural, or cultural character."

Page G-4: The definition of septic system refers to an individual "on-site system." Many are on off-site easements. Secondly, the definition refers to tanks, tile systems and pits, but not to sand mounds. The dilemma is that a sand mound system would be environmentally superior to the alternative septic systems, but would result in increases in development, and the resultant deleterious effects.

Attachment C

PlanMaryland

What: Goals and Objectives
Growth Preservation Sustainability

Where: Designated Places
AgPrint GreenPrint GrowthPrint

How: State Policies and Implementation Strategies
Designation Coordination Targeting

Build Local Government Collaboration

Annual Assessment and Report