

WRE

2024

Planning Commissions Comment Packet



- Summary & Staff Recommendations to Planning Commissions re: 60-Day Review (State & Neighboring) & Public Comment Period
- Redline pages reflecting staff recommendations
- Comments received

March 2026

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WRE 2024

Summary of Comments & Staff Recommendations

Based on October 2025 60-Day Review draft

Review & Comment Recap:

- **State Agency Review:** A draft of the 2024 WRE was sent to Maryland Department of Planning on November 12, 2025, to coordinate the State-required 60-day review process for State agencies and neighboring jurisdictions. Comments were received on January 20, 2026.
- **Neighboring Jurisdiction Review:** The draft was also provided to neighboring jurisdictions – Adams County, Baltimore County and City, Frederick County, Howard County, Montgomery County, and York County. The only jurisdiction that provided comment was Frederick County.
- **Public Review:** The draft plan element was available online for public review beginning on November 12, 2025. News releases were issued November 24, 2025, and January 6, 2026, to inform the public that the document was available for review and comment.
- **Planning Commissions' Public Hearings:** All nine planning commissions advertised for and held public hearings in January and February 2026 to receive comments on the draft plan element. No public comments were received as part of the public record at any of these hearings.

This document compiles and summarizes the substantive comments received from State agencies and Frederick County. A staff response and/or recommendation is provided for each. This document is accompanied by a redline version of the draft WRE plan element to reflect the specific changes that would be made to the document if these recommendations are accepted. Page numbers in black reference location in the October 2025 draft; page numbers in *blue italics* reference the March 2026 redline version.

State Agencies

Commenter: **Maryland Department of Planning (MDP)**

Summary of Comments & Staff Recommendation(s):

1. MDP commends the county on the excellent, thorough, and nuanced analyses completed in the Draft Amendment to assess the capacity and deficits of county water resources to meet future demand at buildout, including an assessment of limitations and how those limitations can be overcome.
↳ *No Recommended Action:* This is a commendation on the plan document.
2. MDP commends the county on the excellent, thorough, and nuanced analyses completed in the Draft Amendment to assess the capacity and deficits of county wastewater resources to meet future demand at buildout, including an assessment of limitations and how those limitations can be overcome.
↳ *No Recommended Action:* This is a commendation on the plan document.
3. MDP encourages consideration of how the State's Planning Principles will be applied through comprehensive plan implementation generally, and WRE implementation specifically.
↳ *Recommended Action:* Address all the Planning Principles should be discussed as part of the Master/comprehensive plans. However, add, before the Master Plan goals in Section 5.0, the 4 Planning Principles that could be relevant to the WRE and how the WRE addresses/fosters these principles. (Page 15, *15-16*)



4. MDP suggests including the potential for institutional land uses, if appropriate, in the section discussing the new development potential based on the Buildable Land Inventory (BLI).
 - ↳ **Recommended Action:** Add text to indicate that existing institutional uses are already captured in the Water & Sewer Master Plan and WSAs, and future uses will be assessed once specific projects with specific locations are proposed. (Page 63, 67)
5. MDP suggests including additional information about water capacity outside of DGAs.
 - ↳ **Recommended Action:** The graph and table on Pages 86-87 (91-92) demonstrate the capacity available outside of the DGAs, but add text within the box for countywide availability to clarify that water capacity is available outside DGAs.
6. MDP noted discrepancies between combined existing countywide flows (Page 101, 106) and estimated current (2023) combined flows serving a population of 84,208 (Page 102, 107). MDP recommends clarifying this discrepancy.
 - ↳ **Recommended Action:** The discrepancy appears to be an oversight. Revise the figures in the text (Page 106) to match the totals in the table, “2023 Existing Flows and Population Served” (Page 107). Add a note to the bottom of the table to clarify the difference between Existing Flows and Existing Demand.
7. MDP suggests considering including an analysis of the additional wastewater capacity needed outside of DGAs, particularly if sewer service areas expand outside of the DGA.
 - ↳ **No Action Recommended:** In keeping with State policy, the Sewer Service Areas do not extend outside of the DGAs.
8. MDP notes that there is a prohibition on new WWTPs that discharge to surface waters and suggests that the WRE address the ban with respect to the new WWTP.
 - ↳ **Recommended Action:** The new WWTP referenced is actually a replacement WWTP for Union Bridge. Therefore, it is likely to take over the existing MDE WWTP permit, rather than being new permitted capacity. Replace the word “new” in the table on Page 110 (116) and the summary box on Page 111 (117) with “replacement” and “replace,” respectively to clarify the Union Bridge WWTP would not be considered a new WWTP with a new discharge permit. As of December 2025, MDE has given Union Bridge approval to proceed with replacement of the existing WWTP.
9. As the County and municipalities consider their needs during the updates to the Master/comprehensive plans, consideration should be given to how the requirements of the Land Use Article 3-114, which addresses the housing element, can be met within the limitations of a restricted water supply. MDP is available to help the county with these considerations.
 - ↳ **No Action Recommended:** This discussion is more appropriate for the County Master Plan and individual municipal comprehensive plan update processes. The WRE is meant to inform those processes regarding opportunities and limitations of water resources for future growth and development.
10. MDP recommends further evaluation into how human-induced hazards may impact future water resources development and infrastructure. The 2024 WRE could incorporate capital projects to highlight where these hazards, such as dam failures, infrastructure failure or disruption, deferred maintenance, and other hazards may impact core infrastructure.
 - ↳ **Recommended Action:** Specific hazard assessments and related capital projects have already been identified through the development of other assessments and plans. Add text to reference the Carroll County Hazard Mitigation Plan and Risk/Resilience Assessments and Emergency Response Plans developed by each municipality. (Page 146, 152)
 - ↳ **Recommended Action:** In Section 34.5 (Page 175, 182), add to Specific Action Items Already in Place a reference to the Hazard Mitigation Plan, Risk Assessment and Emergency Response Plans, and the Floodplain Management Code.



11. MDP suggests expanding PFAS goals to include the testing of private wells and the potential need for additional capacity from contaminated well or failing septic systems.
 - ↳ *No Action Recommended*: Since the Health Department has authority over the permitting of individual private wells, it would be more appropriate for this to be explored by the Health Department than the County or municipalities.
12. MDP recommends incorporating further background information about equitable outcomes of the relevant policy goals. Incorporating and connecting equity outcomes to specific capital projects would cover the gap between having a vision for equitable outcomes and proactive planning to reach these goals. MDP recommends mapping be included that supports the WRE planning process related to equity.
 - ↳ *Recommended Action*: Add a paragraph in the introductory text above Section 31.0 on Page 151 (157), “Strong consideration will be given to finding funding sources for water-resource-related projects across the board that will not place undue burden on underserved or overburdened populations.”
 - ↳ *Recommended Action*: Add a paragraph in the introductory text above Section 8.2.4 on Page 49 (50) to recognize MDE’s Climate Vulnerability Score tool within MDEnviroScreen, “MDE’s *MDEnviroScreen – CVS* tool provides a Climate Vulnerability Score (CVS) that determines the susceptibility of communities to climate impacts at the census tract level. The CVS integrates the existing Environmental Justice (EJ) Score with five additional climate variables (Tree Canopy Coverage, Urban Heat Island, Drought, Storm Surge, and Flooding), establishing climate vulnerability as a function of both climate exposure and community impact. The resulting percentile scores classify vulnerability into four categories: baseline, low, moderate, or high. No areas of Carroll County received a high CVS score.”
 - ↳ *Recommended Action*: Using MDE’s online screening tool, add a map to Section 8.2.8 Equity (Page 51, 53-55) to show where underserved and overburdened communities/populations would be located in Carroll County according to MDE’s data. Add text describing the results for Carroll County:

Commenter: **Maryland Department of Housing & Community Development (DHCD)**

Summary of Comments & Staff Recommendation(s):

Comments offer information on programs associated with DHCD and how they can be used to leverage DHCD resources to accomplish housing and community development goals. No revisions are suggested.

- ↳ *No Action Recommended*: While these programs are important, the pursuit of implementing tools and funding to meet housing and community development goals is more appropriate as part of the master/comprehensive plan update process and implementation.

Commenter: **Maryland Department of Transportation (MDOT)**

Summary of Comments & Staff Recommendation(s):

1. Comments suggest that shifting transportation mode choice towards transit and active transportation, shortening automobile trips, and increasing carpooling and vanpooling, are critical components to building efficient, equitable, and sustainable places, and is also essential to accommodating Maryland’s changing demographic composition. Active transportation funding programs managed by MDOT are shared.
 - ↳ *No Action Recommended*: Information and programs associated with transportation will be addressed as part of the Carroll County Master Plan update and individual municipal comprehensive plan updates.
2. Consider adopting the MDOT’s Complete Streets initiative.



- ↳ **Recommended Action:** Add Short-Term Action Items to Section 34.4 regarding land use patterns (Page 174, 181), “Evaluate the feasibility and benefits of implementing MDOT’s Complete Streets initiative where appropriate within DGAs, which may include options for incorporating SWM BMPs.” More in-depth consideration of complete street principles should be addressed as part of the Carroll County Master Plan update and individual municipal comprehensive plan updates.
- 3. In 29.0 on Page 145, consider mentioning the SHA Climate Change Vulnerability online ArcGIS web application map and Climate Change programs.
 - ↳ **Recommended Action:** Add related text to end of third paragraph on Page 145 (151), “The SHA Climate Change Vulnerability [online ArcGIS web application map](#) showcases geospatial data products related to climate change and the potential impacts on State transportation infrastructure. The purpose of this application is to support efforts to avert and mitigate potential impacts of sea-level rise that result from global climate change on State roadway and bridge infrastructure ([MDOT Climate Change programs](#)).”
- 4. In 43.1.4 on Page 262 (270), consider mentioning an SHA drainage improvement project that was completed on Main Street in Sykesville in 2025.
 - ↳ **Recommended Action:** Add System-Specific Action Item Already in Place on Page 262 (270), “In May 2025, SHA completed a drainage improvement project on MD 851 from Main Street to Warfield Road in Sykesville, which included drainage and pavement upgrades to address failing storm drain system and impacts to the road surface.”

Commenter: **Maryland Department of the Environment (MDE)**

Summary of Comments & Staff Recommendation(s):

1. MDE notes that Page 99 (104) indicates that the removal of I&I can be confusing to the reader. MDE suggests either a footnote be added to note that demand shown as I&I is removed to show only usage generated by development and/or include the I&I as a column in the Table rather than incorporating it to the totals.
 - ↳ **Recommended Action:** Removal of I&I from the available capacity is consistent with MDE’s methodology for the Wastewater Capacity Management Plan worksheets. The I&I is removed because it consumes flow capacity that is then not available for other, additional users. To help clarify this point, add text to the 4th paragraph under 18.1 Capacity & Demand Methodology (Page 99, 104), “The I&I is removed from available capacity for additional growth because it consumes flow capacity in the WWTP. While it may not result from users, it still needs to be captured in the available capacity, as it still needs to be treated by the WWTP.”
2. MDE noted that the table on Page 103 (108), “Wastewater Capacity for Each Designated Growth Area at Buildout of 2023 Sewer Service Area,” indicates that the “Existing Flows” are from 2022, which is not consistent with the table on Page 102 (107), which references 2023 Existing Demand.”
 - ↳ **Recommended Action:** Revise the column heading in the table on Page 103 (108) to say “2023” Existing Flows.
 - ↳ **Recommended Action:** Add footnote to the table, “2023 Existing Flows¹ and Population Served,” on Page 102 (109) to provide clarity to the difference between the 2023 Existing Flows and 2023 Existing Demand. “¹ 2023 Existing Flows represents the flows for the year 2023. This differs from 2023 Existing Demand in other tables, which represents the 3-year average flows for 2020-2022.”
3. Comments offer information related to Tier II waters and applications for individual development projects within these watersheds. No revisions are suggested.
 - ↳ **No Action Recommended:** Pages 43-46 (47-51) of the WRE contain background information related to Tier II waters and their importance, as well as a map of the Tier II segments in Carroll County. In addition, while the Tier II waters anti-degradation review process is important to



maintaining high-quality waters, review of these individual projects is an implementing tool that helps to support the WRE.

4. Under Flooding, MDE referenced a specific property for which the project coordinator should consider climate resiliency and referenced a climate toolkit.
 - ↳ *Recommended Action:* Add related text to end of third paragraph on Page 145 (151), “The SHA Climate Change Vulnerability [online ArcGIS web application map](#) showcases geospatial data products related to climate change and the potential impacts on State transportation infrastructure. The purpose of this application is to support efforts to avert and mitigate potential impacts of sea-level rise that result from global climate change on State roadway and bridge infrastructure ([MDOT Climate Change programs](#)).” (Same recommendation and toolkit as found at #3 under MDOT’s comments above).
 - ↳ *Recommended Action:* Add paragraph at the end of the text on Page 146 (152) under 29.0 Potential Effects Related to Climate Change: Stormwater to indicate that the Carroll County Hazard Mitigation Plan has a role in the identification and mitigation of hazards. “Carroll County and its municipalities continue to assess hazards and their risks and impacts through various assessment and implementation tools already in place. Some of the plans that address risk and hazards, including identifying capital projects, include the Carroll County Hazard Mitigation Plan and the Risk and Resilience Assessments with Emergency Response Plans developed by each municipality and submitted to EPA.”

Commenter: **Maryland Department of Natural Resources (DNR)**

Summary of Comments & Staff Recommendation(s):

1. The Maryland Forest Service commends the County for working to expand Rural Legacy Areas, adopting several enhancements to the FCA requirements, and pioneering forest banking. Additionally, Carroll County’s focus on planting riparian forest buffers (RFBs) is to be applauded.
 - ↳ *No Recommended Action:* This is a commendation on the plan document.
2. With urban and buffer plantings, thought should be given to climate change and what species would thrive in an altered climate
 - ↳ *Recommended Action:* Add Short-Term Action Item to 34.2 on Page 171 (178), “Consider tree species for urban and buffer plantings that would thrive in an altered climate. A recommended resource is the USDA’s webpage, “[Climate Change Projects for Individual Tree Species](#)” with link to recommended resource.”
3. The County would benefit from further review and development of an urban wildland prevention plan.
 - ↳ *No Action Recommended:* While there could potentially be some co-benefits for water quality to implementing an urban wildland prevention plan, this doesn’t seem like a high priority for Carroll County, where more urban areas transition quickly to farmland and rural landscape. This issue is considered as part of the overall Carroll County Master Plan update process.
4. DNR’s Resource Assessment Service recommends considering stronghold and Tier II watersheds while prioritizing conservation efforts, restoring riparian forest buffers, enhancing stormwater management, and expanding Rural Legacy Areas.
 - ↳ *Recommended Action:* Add Short-Term Action Item to 34.2 on Page 171 (178), “Consider stronghold and Tier II watersheds when prioritizing conservation efforts, restoring riparian forest buffers, and enhancing SWM BMPs.” Add Short-Term Action Item to 34.5 on Page 176 (183), add Short-Term Action Item “Consider stronghold and Tier II watersheds when expanding Rural Legacy Areas.”
5. Consider incorporating state-of-the-art culvert design in new road construction to replace conventional culverts and gain additional benefits for flood prevention.



- ↳ **Recommended Action:** Add Short-Term Action Item to 34.3 on Page 172 (179-180), “Investigate incorporating state-of-the-art, non-conventional culvert designs in new road construction to help mitigate debris jams and flooding events associated with high, intensive stormflow events projected to occur more frequently with climate change. Advanced culvert/stream crossing designs may also facilitate passage of fishes and other aquatic organisms and improve connectivity among populations.”

Neighboring Jurisdictions

Commenter: **Frederick County**

Summary of Comments & Staff Recommendation(s):

1. Add background information about BMC Round 10 population projections for general audience (6.2).
 - ↳ **Recommended Action:** More detailed information about population projections is included in the Carroll County Master Plan and municipal comprehensive plans. Recommend adding a link to the BMC Round 10 Cooperative Forecasts webpage where mentioned on Page 19 (20).
2. Questions if PUREWater-type water reuse in Carroll County could be a short-term action rather than long-term action.
 - ↳ **No Action Recommended:** For purposes of the WRE, short-term actions are those within the next five years. Until PUREWater is fully operational and has had time to work out any issues, it will not likely be considered elsewhere in the county. In addition, it would likely take more than five years to obtain buy-in and program funding for a similar project for another municipal system.
3. Frederick County does not support the inclusion of interconnection with Frederick County for the Mount Airy water system (41.3.2).
 - ↳ **No Action Recommended:** Inclusion as an option in the WRE does not commit the Town or Frederick County to future action. It does, however, demonstrate that options for future sources are possible. If there comes a time in the future when this may be considered, the Town would coordinate with Frederick County and could not proceed without concurrence from Frederick County.

Public

Commenter: **None.**

Summary of Comments & Staff Recommendation(s): **N/A**

Staff – Unrelated to Comments Received

Commenter: **Staff**

Summary of Comments & Staff Recommendation(s):

Wastewater

1. Section 19.1, starting on Page 101 (106), is titled “Capacity of Individual Municipal Systems by Watershed.” However, numbers are not presented by watershed until Section 19.2 Capacity of Individual Municipal Systems by Watershed (Page 105, 110).
 - ↳ **Recommended Action:** Since Section 19.1 does not breakdown numbers by watershed, rename the section to “Capacity of Individual Municipal Systems by Municipal System.” In addition, add a table to Section 19.2 on Page 105 (110) that aggregates the 2023 Buildout Demand for each municipal system by watershed.



2. Section 19.1, the figure for New Windsor’s Total 2023 Buildout Demand in the table, “2023 Wastewater Capacity Needed or Remaining to Meet Buildout Demand in 2023 Planned Sewer Service Areas,” on Page 104 (109) is not consistent with other similar tables. It appears this number was missed when updating.
 - ↳ *Recommended Action:* Replace “186,115” with “169.489” for consistency with other similar tables.

Municipal System Specific: Union Bridge

3. Since the release of the draft WRE for public and State-agency review, the Town of Union Bridge received approval from MDE to proceed with the design and construction of a replacement WWTP. This replacement WWTP would include ENR treatment and a design capacity of 0.4 mgd. This would have a significant impact on the ability of the Town to accommodate its buildout demand.
 - ↳ *Recommended Action:* Add text to 45.2 on Page 279 (287-288) reflecting MDE’s approval of the replacement WWTP and allowing the Town to proceed. “The Town received an approval letter from MDE in December 2025 accepting the design and allowing the Town to proceed to the design phase. The preliminary design includes ENR treatment level and a design of 0.4 mgd, which would expand the existing capacity by 0.2 mgd. MDE is willing to fund costs associated with an upgrade to ENR for the replacement WWTP. The Town is pursuing additional funding to allow the design and construction to proceed.”
 - ↳ *Recommended Action:* In 45.3.5 on Page 287 (295), add System-Specific Action Item Already in Place to reflect MDE approval. “Received approval from MDE in December 2025 to proceed with design and engineering of a 0.4 mgd replacement WWTP located outside of the floodplain [2024 WRE]”
 - ↳ *Recommended Action:* In 45.3.5 on Page 287 (295), update the third Short-Term Action Item to “Pursue additional funding for the construction costs of a relocated WWTP that are not eligible for ENR funding from MDE.” Also, move the Long-Term Action Items up to the Short-Term Action Items section to reflect the current movement toward designing and constructing the relocated WWTP.