

Greensboro 2050 Comprehensive Plan — Response to State and County Review Comments

Planning Commission public hearing, September 28, 2026 · Peter Johnston Associates

Summary

This document lists the revisions to the draft Plan made in response to the State review of September 24, 2026 (MDP, with MDOT, DNR, DHCD and MDE comments) and to Caroline County’s comments. Caroline County has reviewed the draft, and the Town has addressed the County’s comments. The Planning Commission will ratify these revisions before it recommends the Plan to the Mayor and Council.

All 69 State agency comments have a response below. The Plan text addresses 61, including one that the Town will confirm with a fact before adoption. The remaining 8 are noted, will be completed in the final edit, or will be done at adoption. All map corrections have been made, including the new Growth Tiers map (Map 18).

The revised draft also carries out Maryland’s eight Planning Principles (Land Use Article § 1-201, as amended by Chapter 64 of 2025) through new sections on community engagement, working lands, resilience and access to jobs and services. Because the update began in January 2026, after that law took effect on October 1, 2025, the Plan implements the Principles now rather than at the next update.

Principal changes

Topic	How the revised draft responds	Where
Statutory elements	The § 3-102 element list replaces the § 3-201 citation, and the development regulations and area of critical State concern elements are identified. A paragraph records that the update began in January 2026, before HB 243/SB 197 takes effect.	Introduction, Context for Planning
Planning Principles	New sections carry out the Principles: Community Engagement (Equity), Working Lands (Land), Resilience Policies (Resilience), access to jobs, housing and services (Transportation), and Choptank River Park as the Town’s waterfront gathering place (Place). A crosswalk shows where the Plan carries out each Principle.	Introduction; Ch. III; Ch. IV; Ch. V; Ch. VIII; Ch. XI
County coordination	The Town provided the draft to Caroline County on July 25, 2026; the comment period closed August 25, 2026, and the County’s comments are resolved. A new County Coordination subsection records the review, and the § 3-112 citation is corrected.	Ch. IV
Growth tiers	Municipal tiers are described as I, II, IIA and IVA. A Growth Tiers subsection and Map 18 assign Tier I to the sewer service area and Tier IIA to T-4; the Town asks the County to designate the Rural Buffer Tier IVA.	Context for Planning; Ch. IV; Map 18
Rural edge terms	“Rural Buffer” (outside the Town, Map 6) and “T-4 Rural Edge” (inside the Town) are used consistently; “Preserved Land Greenbelt” and “scenic/environmental buffer” are removed.	Ch. I, II, IV, XI
Population and households	The Plan uses 2,634 residents and 832 households (ACS 2020–2024) as the current population. The growth scenarios start from the 2020 Census count of 1,919.	Introduction; Ch. IV; Ch. VII; Ch. VIII; Appendix A
Capacity and growth	The duplicated capacity lists are replaced. Capacity inside the corporate limits is about 210 units on vacant land, including the Kinnamon Meadows PUD, plus redevelopment capacity on about 70 underutilized parcels, with a land-needed statement. The 70% target becomes measurable targets.	Ch. II; Ch. IV; Ch. XI
Sewer	County revisions state Greensboro’s hydraulic capacity after the Goldsboro reservation (about 113,000 gpd, about 450 EDUs) and the roughly 300-EDU nutrient limit as binding. State-response revisions add the no-extension policy, a County tier, Water and Sewer Plan coordination, and a residential allocation reserve.	Ch. III; Ch. VI; Ch. XI

Topic	How the revised draft responds	Where
Housing and fair housing	Appendix A is rewritten with sourced Census, ACS and HUD data. The Plan uses the 59-unit State production target and states that the Town has not yet adopted its ADU ordinance.	Ch. VII; Appendix A
Maps	All map corrections are made, the List of Maps matches the printed titles, and the new Growth Tiers map (Map 18) is included.	List of Maps; map pages
Reporting	The § 1-207 Annual Report and Five-Year Mid-Cycle Report replace “biennial” reporting, and an Implementation Matrix is due within six months of adoption.	Ch. II; Ch. XI

Responses to State agency comments

Status key: Addressed = revised in the Plan text; Addressed; confirm = revised, with one fact to confirm before adoption; Addressed (County) = resolved by the County-requested revisions.

Maryland Department of Planning (September 24, 2026)

Ref	Comment	Response	Where in the Plan	Status
MDP 1	Plan acknowledges the Principles but does not integrate them	The Plan now carries out the Principles: a crosswalk citing Chapter 64 of 2025, plus new Community Engagement, Working Lands, Resilience Policies and transportation access sections. Because the update began in January 2026, after Chapter 64 took effect, the Plan now implements the Principles; the next update will follow the HB 243 element structure.	Introduction; Ch. IV; Ch. V; Ch. VIII; Ch. XI	Addressed
MDP 2	Map 3 (Zoning) missing; maps out of order	Map 3 is included, the List of Maps matches the printed maps, and Map 18 is added.	List of Maps	Addressed
MDP 3	Add the § 1-207(b) Annual Report and § 1-207(c)(6) Mid-Cycle Report	Added both commitments; replaced “biennial” reporting and the “every 5–10 years” review.	Ch. II; Ch. XI	Addressed
MDP 4	“Preserved Land Greenbelt” versus Rural Buffer; County Map 1-4 shows Tier II; map reference left blank.	Replaced with the Rural Buffer (Map 6). The Town will ask the County to designate it Tier IVA and remove Tier II from land the Town will not serve.	Ch. I; Ch. IV, Rural Buffer	Addressed
MDP 5	Have greenbelt parcels changed; does the former growth area join the greenbelt?	The Annexation Plan withdraws the 2010 growth area (about 3,590 acres), and the Rural Buffer revises the 2010 greenbelt.	Ch. IV, Annexation Plan and Rural Buffer	Addressed
MDP 6	Economic Development goal and T-4 use other rural-edge terms; relation to tiers.	Uses “the Rural Buffer (Map 6)”; T-4 is defined as an in-town reserve, Tier IIA on Map 18.	Ch. I; Ch. II; Ch. IV	Addressed
MDP 7	Use Maryland Historical Trust flood guidance	Objective added in Chapter I and mirrored in Chapter X.	Ch. I; Ch. X	Addressed
MDP 8	Consider a local resilience ordinance, Plan or policy	Resilience Policies adopted in Chapter V, including two feet of floodplain freeboard, with floodplain and stormwater ordinance amendments within two years.	Ch. I; Ch. V, Resilience Policies	Addressed
MDP 9	Purpose of larger-lot suburban expansion	Clarified as the existing pattern, not a proposal.	Ch. II, Existing Land Use	Addressed
MDP 10	T-1 description conflicts with R-1	Added a short-term strategy to compare the historic core with R-1 standards and write the T-1 district.	Ch. II, Implementation Strategies	Addressed
MDP 11	“Favors” low-density use	Revised to “over-allocates land to.”	Ch. II, Zoning	Addressed
MDP 12	Existing Land Use map lacks a number	Map 1 is numbered and its title corrected.	Map 1	Addressed

Ref	Comment	Response	Where in the Plan	Status
MDP 13	“Town Center” and similar district names do not exist	Replaced with T-1 Urban Core, T-2 Neighborhood, T-3 Suburban, T-4 Rural Edge and Special Employment zoning districts.	Ch. II; Ch. XI	Addressed
MDP 14	Use “transect zone” consistently	Added a definition, replaced variants and revised the Map 4 legend.	Ch. II, Transects; Map 4	Addressed
MDP 15	Clarify “Suburban Residential”; consider a T-2 zone and rezoning R-2/R-3	T-3 strategy evaluates rezoning qualifying T-3 blocks, mostly zoned R-1, to T-2.	Ch. II	Addressed
MDP 16	Establish a Special Employment zoning district	Added as a short-term strategy.	Ch. II	Addressed
MDP 17	Is the T-4 “scenic/environmental buffer” the greenbelt?	Phrase removed; T-4 described as an in-town reserve.	Ch. II	Addressed
MDP 18	Add the Maryland Department of Agriculture as a partner	Added (MALPF); Working Lands policies support farmland easements in the Rural Buffer.	Ch. II; Ch. IV	Addressed
MDP 19	Implementation Matrix for the Mid-Cycle Report	Commitment to adopt one within six months, drawing on Table SA-1.	Ch. II; Ch. XI	Addressed
MDP 20	Preserve T-4 open space, parks, trails and greenways in perpetuity	Added to the Land Use implementation actions.	Ch. XI	Addressed
MDP 21	List Town projects in the County LPPRP	Action added.	Ch. XI	Addressed
MDP 22	Sewer policy versus the County Tier II ring	Capacity clarified in the County revisions; State-response revisions add the no-extension policy and the request to the County.	Ch. III, Sewer System; Ch. IV	Addressed
MDP 23	Follow the § 3-206 meet-and-confer before adopting the MGE	Review completed: the draft went to the County on July 25, 2026, the comment period closed August 25, 2026, and the County’s comments are resolved. The County Coordination subsection records it, and the § 3-112 citation is corrected.	Ch. IV, County Coordination	Addressed; confirm
MDP 24	Does capacity rise if T-3 becomes T-2?	The Plan evaluates rezoning qualifying T-3 blocks to T-2; we will estimate the added capacity when the T-2 district is prepared.	Ch. II	Addressed
MDP 25	70% T-1/T-2 target versus 42% of capacity	Replaced with: 100% of new units inside the corporate limits on sewer; no new lots in T-4; at least 50% of units outside the PUD in T-1 and T-2.	Ch. II; Ch. XI	Addressed
MDP 26	Underutilized capacity omits TRC/PUD land	Kinnamon Meadows is reconciled and counted in T-3 vacant capacity (about 210 units on vacant land); redevelopment capacity on about 70 underutilized parcels is stated separately.	Ch. IV	Addressed
MDP 27	Commends the Conservation Overlay Zone	No change needed.	—	Noted
MDP 28	Map 6: smaller scale; show all preserved land in the Town	Map 6 retitled “Rural Buffer and Protected Lands” and revised to show preserved land inside the Town and the T-4 Rural Edge.	Map 6	Addressed
MDP 29	Map 10 numbered “*”; title mismatch	Numbered and retitled.	Map 10	Addressed
MDP 30	Map 16: show future pedestrian connections	Added planned connections, Safe Routes to School links, and the Oxford Line.	Map 16	Addressed
MDP 31	Extend the street grid and bike/ped networks into new development	Policy added.	Ch. VIII	Addressed
MDP 32	Bicycle and pedestrian master plan; bike parking and links to Greensboro Elementary	Added a plan commitment for Safe Routes to School and bike parking.	Ch. VIII; Ch. XI	Addressed
MDP 33	Transit destinations not available in the Town	Added destinations, Commuter Choice Maryland, a park-and-ride lot, and demand-response service.	Ch. VIII	Addressed

Ref	Comment	Response	Where in the Plan	Status
MDP 34	Street typologies for T-1 to T-3	Added a Land Development Ordinance task, using the Aberdeen and Galena models.	Ch. VIII	Addressed
MDP 35	CIP resilience prioritization	Resilience criteria for ranking capital projects adopted, with a scoring method to be built with MDP.	Ch. V; Ch. XI	Addressed
MDP 36	Housing element meets requirements; Housing Data Dashboard	Statutory workforce housing definition used; HUD income limits cited.	Ch. VII; Appendix A	Addressed
MDP 37	Best practice: assess the prior Plan's housing recommendations	Not included in this update.	—	Noted
MDP 38	Best practice: support the fair housing assessment with data	Appendix A rewritten with sourced Census, ACS and HUD data, including poverty by race and ethnicity. HUD's cost-burden data (CHAS) is not available for the Town or County, so the Plan uses county cost burden and commits to a resident housing survey.	Appendix A	Addressed
MDP 39	Best practice: DHCD production target	59-unit target paragraph added.	Ch. VII	Addressed
MDP 40	Growth tier map required; submit under § 1-504; Tier II bars solar over 5 MW	Added the Growth Tiers subsection and Map 18; the map will be submitted to MDP after adoption.	Ch. IV; Map 18	Addressed
MDP 41	Municipal tiers are I, II, IIA and IVA	Tier paragraph replaced.	Introduction, Context for Planning	Addressed
MDP 42	Review the Sustainable Communities Action Plan	Action Plan cited as the companion to Chapters VII and IX; designation term confirmed.	Ch. IX	Addressed
MDP 43	Accessibility check found 18 failed rules	Export the adopted Plan from Word with tags, headings, table headers and map alt text, then check it in Acrobat.	—	At adoption
MDP 44	Make the letter part of the hearing record; send PDF and Word after adoption.	Letter and attachments entered into the hearing record; adopted Plan to be sent in both formats.	—	Noted

Maryland Department of Transportation (August 25, 2026)

Ref	Comment	Response	Where in the Plan	Status
MDOT 1	SHA and OATM resources, Complete Streets, grant programs	Programs named; a Complete Streets policy will be considered.	Ch. VIII	Addressed
MDOT 2	Oxford Line is MTA-owned and railbanked	Paragraph added; corridor shown on Map 16.	Ch. VIII; Map 16	Addressed
MDOT 3	Use MDOT, SHA and MTA acronyms	Will be applied in the final editorial pass.	Ch. VIII	Addressed
MDOT 4	Use AADT instead of ADT	Revised.	Ch. VIII	Addressed
MDOT 5	MD 404 PEL study is not resurfacing	Revised; CTP projects outside the Town recast as regional context.	Ch. VIII	Addressed
MDOT 6	Functional classes of MD 313, MD 480 and MD 314	Text and Map 15 corrected.	Ch. VIII; Map 15	Addressed
MDOT 7	MD 313 and MD 314 segments meet SHA bicycle criteria	Added.	Ch. VIII	Addressed
MDOT 8	America's Byways signage on MD 313	Added.	Ch. VIII	Addressed
MDOT 9	Transit and commuter resources	Added, with a park-and-ride lot and EV charging.	Ch. VIII	Addressed

Department of Natural Resources

Ref	Comment	Response	Where in the Plan	Status
DNR 1	Anadromous fish spawning habitat; impervious thresholds; guidance documents	Paragraph added, including the 5% and 10% thresholds and DNR guidance; Working Lands policies protect Choptank fisheries.	Ch. IV; Ch. V	Addressed
DNR 2	Program name is the Natural Heritage Program	Revised.	Ch. V	Addressed
DNR 3	Upper Choptank River Listed Species Site	Paragraph added; site shown on Map 9.	Ch. V; Map 9	Addressed
DNR 4	Changes to POS- or CPP-funded parkland need DNR coordination	Note added.	Ch. III, Parks and Recreation	Addressed

Department of Housing and Community Development (August 13, 2026)

Ref	Comment	Response	Where in the Plan	Status
DHCD 1	Consistent with the Sustainable Communities Plan	No change needed.	—	Noted
DHCD 2	HB 1045 and HB 90 housing and fair housing requirements	Requirements met (MDP concurs); Appendix A rewritten; the Town will provide it to DHCD if required.	Ch. VII; Appendix A	Noted
DHCD 3	Community Legacy, home repair, CSBG and energy-efficiency programs	State programs paragraph added.	Ch. VII	Addressed
DHCD 4	Facade Improvement Program, Main Street and Neighborhood BusinessWorks	Added.	Ch. IX	Addressed
DHCD 5	No point-in-time count or homelessness goals	Homelessness is counted regionally by the Mid-Shore Continuum of Care; the Town will support its count and refer residents to 2-1-1 Maryland.	Ch. VII	Addressed
DHCD 6	Greensboro Heights has 40 LIHTC units	Appendix A corrected.	Appendix A	Addressed
DHCD 7	Local Government Infrastructure Finance Program	Added to the State programs paragraph.	Ch. VII	Addressed
DHCD 8	“Additional 13,742 units” in Caroline County by 2030	13,742 is the County’s total housing need in 2030, not new units; the Plan uses Greensboro’s 2026–2030 target of 59 units.	Ch. VII; Appendix A	Addressed

Maryland Department of the Environment

Ref	Comment	Response	Where in the Plan	Status
MDE 1	County Water and Sewer Plan: northern connections; overdue update	The County revisions record the August 2025 decision not to extend service to the northern towns; a State-response revision adds coordination on the Water and Sewer Plan update.	Ch. III; Ch. VI	Addressed (County)
MDE 2	Forge Branch 1 Tier II antidegradation review	Paragraph added; Forge Branch 1 and its catchment referenced to Map 9.	Ch. VI; Map 9	Addressed
MDE 3	Flood Zones AE and X; resilience steps; NFIP coordinator	Strategy added; Resilience Policies adopted in Chapter V.	Ch. V; Ch. VI	Addressed
MDE 4	Project-level requirements (codes C-1, R-1)	Apply at project review; no plan change.	—	Noted

Revisions responding to Caroline County comments

Caroline County reviewed the draft, and we resolved its comments. The revisions below were made in draft v9-4-26 at the County's request and are carried into the revised draft.

Topic	Revision	Where
Wastewater capacity	Explains that the plant's design capacity rose to 0.332 MGD to serve Goldsboro, which holds a 52,000 gpd reservation. About 113,000 gpd (about 450 EDUs) remains for Greensboro, and the roughly 300-EDU nutrient limit is the binding constraint. Table CF-1 summarizes plant capacity.	Ch. III; Ch. IV; Ch. XI
Northern towns	Records the Mayor and Council's August 2025 decision not to extend sewer service to the remaining north county towns, deferring an alternative treatment facility to Caroline County.	Ch. III
School capacity	Replaces the 500-student figure with Greensboro Elementary School's State Rated Capacity of 818 following the 2021 replacement project.	Ch. III
Parks	Notes that North County Regional Park serves Town residents but is owned and managed by Caroline County outside the corporate limits; Table CF-2 lists parks, open space and recreation lands serving Greensboro.	Ch. III
Health facilities	Describes the University of Maryland Shore Regional Medical Center expansion serving Caroline and neighboring counties.	Ch. III
Accessory dwelling units	Adds HB 1466 (2025) and states that ADUs are authorized on land with a qualifying single-family dwelling.	Introduction; Ch. VII
Septic systems	Adds coordination with MDE and the Caroline County Health Department.	Ch. VI

Other corrections

The agencies did not raise these, but we corrected them so the Plan is internally consistent.

Topic	Correction	Status
Population and households	2,634 residents and 832 households (ACS 2020–2024) used throughout; growth scenarios start from the 2020 Census.	Done
Founding date	1732 used throughout.	Done
Sea-level rise	"About 1–1.5 feet by 2050 and up to 4 feet by 2100" used throughout.	Done
Floodplain share	15–20% used throughout; the 32% flood-risk figure is sourced to Peter Johnston & Associates, LLC.	Done
Traffic	Corrected the volume-to-capacity ratio on MD 313 north of Town to 0.96.	Done
Water and nutrient figures	123,700 gpd (about 495 EDUs) used in Chapter VI; nutrient-offset trigger corrected to 300 EDUs.	Done
Enterprise Zone	Made renewal of the North County Enterprise Zone (expires 2028) a short-term action.	Done
Tables	Renumbered to the chapter-based style (LU, CF, SA).	Done
Appendix A	Replaced with a sourced fair housing assessment; unsupported figures and spatial claims removed.	Done

Map revisions

Map	Revision	Status
1 Existing Land Use	Numbered; title year corrected.	Done
2 Vacant Land	Title corrected to the inventory year.	Done
3 Zoning	Included.	Done
4 Land Use Transects	Retitled; corrected the legend and transect-zone labels.	Done
6 Rural Buffer and Protected Lands	Retitled; preserved land inside the Town and the T-4 Rural Edge shown.	Done

Map	Revision	Status
7 Streams & Buffers	List of Maps matched to the printed title.	Done
8 Flood Zones	List of Maps matched; Zones AE and X labeled.	Done
9 Sensitive Areas	List of Maps matched; Upper Choptank River Listed Species Site added.	Done
10 Habitat Connectivity Network	Numbered and retitled.	Done
11 Forest & Wetlands	List of Maps matched to the printed title.	Done
12 and 13 CRAB maps	List of Maps and Chapter V text matched to the printed maps.	Done
14 Conservation Overlay Zone	Retitled.	Done
15 Roadway Functional Classification	MD 313, MD 480 and MD 314 classes corrected (MDOT).	Done
16 Pedestrian Systems	Matched the list of maps; added planned connections, Safe Routes to School links, and the Oxford Line.	Done
18 Growth Tiers (new)	Included after Map 6.	Done

Items to complete before adoption

1. **At adoption:** export the adopted Plan as a tagged, accessible PDF, post it with a Word version, and send both to MDP (MDP 43 and 44); submit Map 18 to MDP (MDP 40).