

September 24, 2026

Donald Starkey, Chair
Greensboro Planning Commission
P.O. Box 340
Greensboro, MD 21639

Dear Chairman Starkey,

Thank you for the opportunity to comment on the draft Town of Greensboro Comprehensive Plan (Plan). The Maryland Department of Planning (MDP) believes planning is important for creating sustainable communities that protect the environment and foster a high quality of life for all Maryland residents. MDP's attached review comments reflect the agency's thoughts on ways to strengthen the Plan and satisfy the requirements of Maryland's Land Use Article.

MDP forwarded a copy of the 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 Departments of Housing and Community Development, Natural Resources, Environment, and Transportation. These comments are included in this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

MDP also ran an accessibility check on the Plan document. Please be advised the attached Accessibility Report was generated using Adobe Pro. While MDP does not advocate use of specific software, Adobe Pro provides accessibility tools to address identified problems. As you may be aware, the US Department of Justice (US DOJ) [established new rules](#) requiring state and local governments with a larger population to make websites and web-based content accessible by April 26, 2027. Since the Town of Greensboro has a population under 50,000, your deadline is April 26, 2028. MDP is working to make our own web site and web-based products accessible. The [US DOJ website](#) has more information about the requirements. The Maryland Department of Disabilities also developed a [web page describing Maryland's Accessibility Initiative](#) that includes resources and training opportunities at the bottom of the page. Through our research, MDP discovered that PDFs are often not accessible to individuals with vision disabilities. One solution is to post duplicates of PDF documents in a text-based format, such as HTML or RTF

(Rich Text Format). The town should consider how it will make the Plan accessible by the time it is adopted and posted on the town's website.

MDP hopes that the town considers the comments included in this review as a reflection of our desire to support its comprehensive planning efforts. Our suggestions are intended to help further the implementation of the state Sustainable Growth Principles and the town's own visions. MDP staff are available to assist the town with any Plan revisions. Please let the department know if the town 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 town's public hearing record. When the Plan is adopted, please send PDF and Word copies of the final document to mdp.planreview@maryland.gov. If you have any questions regarding these comments, please email David Dahlstrom, AICP at david.dahlstrom@maryland.gov.

Sincerely,



Joe Griffiths, AICP
Director, Planning Best Practices

Enclosures: Review Comments Town of Greensboro Draft Comprehensive Plan
Adobe Pro Accessibility Report

cc: Cindy Yost, Town Manager, Town of Greensboro
Crystal Dadds, Director of Planning and Codes, Caroline County



Maryland Department of Planning
Review Comments
September 24, 2026
Draft Town of Greensboro Comprehensive Plan

The Maryland Department of Planning (MDP) received the Draft Comprehensive Plan (Plan) from the Town of Greensboro on July 28, 2026. 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.

Plan Summary

The Plan is an update to the Town's 2009 Comprehensive Plan. On page 6, the Plan articulates five core visions shared by residents and stakeholders:

1. Careful preservation of Greensboro's character and community identity is the foundation of its social and economic vitality.
2. Prudent management of geographic expansion and population growth to maintain unity, variety, order, and balance.
3. Protection of natural amenities and environmental resources for future generations.
4. Support for a well-rounded town offering job opportunities, diverse housing, and quality community life.
5. Creation of vibrant, pedestrian-friendly commercial areas that enhance downtown's historic appeal.

On page 6, the Plan also states: "Through these visions, strategies, and mapped land use recommendations, the Plan aims to foster sustainable, efficient growth; prioritize infill and redevelopment where feasible; align with regional Caroline County plans; and ensure that future decisions enhance rather than diminish what makes Greensboro special".

Growth projections remain low during the planning horizon and the town has pivoted to the promotion of infill development and removed its former municipal growth boundary. The development capacity analysis confirms sufficient density within existing municipal boundaries to accommodate projected growth and Plan recommendations to adjust housing types and density would provide opportunity for additional development capacity.

The MDP comments focus on strengthening the Plan in promoting and implementing this vision and purpose statement through recommended plan priorities, objectives and action steps, as well as potential areas for plan implementation improvement, and internal consistency. Upon adoption, portions of this Plan could serve as a model for other municipal plans.

Maryland Sustainable Growth Principles – Synopsis

Land Use Article Section 1-201 requires Maryland jurisdictions with planning and zoning authority to implement the state’s eight planning principles (Principles) through a comprehensive plan. The Principles reflect the state’s ongoing aspiration to create sustainable communities and to protect the environment to foster a high quality of life for all residents of Maryland. The Principles are land, transportation, housing, economy, equity, resilience, place, and ecology.

Plan Analysis

During the 2025 session, the Maryland General Assembly adopted SB 266, which replaces the 12 Planning Visions (Visions) with the 8 Sustainable Growth Planning Principles (Principles) but maintains the requirement for the Principles to be implemented in comprehensive plans. This change became effective October 1, 2025. Understanding that the town commenced the update to the Plan before the new Principles became effective, the Plan provides an overview of the Visions and Principles on page 7.

The Plan formally acknowledges and broadly addresses all the Principles, but it does not integrate them in this update. The town’s comprehensive plan must be organized around the Principles in the next update.

Conformance with Section 3-102 of the Land Use Article

The following analyzes whether the Plan meets the requirements of Municipal comprehensive plan elements, in accordance with the Land Use Article.

1. General Plan Comments

- On page 5, List of Maps, there is no Map 3 – Zoning included in the Plan, nor is there a reference to it in the text. In general, several of the maps are out of order with their corresponding text in the Plan. Some of the map titles differ from the text used in the Plan and the List of Maps. For example, the Plan text on page 18 refers to “Land use planning areas” and Map 4 (page 29) is titled Land Use Plan, yet the List of Maps identifies Map 4 as “Land Use Transects”, Map 6 as “Future Land Use Plan, which is labeled as “Rural Buffers” on page 46.

- An additional recent update is the requirement for the Planning Commission to prepare and submit an Annual Report under Land Use Article § 1-207(b). A Five-Year Mid-Cycle Report under § 1-207(c)(6) is also required to review how well the comprehensive plan is being implemented.

2. 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 found in Chapter I, page 10. The element articulates the visions and priorities of the town for this Plan and the Plan's timeframe.

- The Plan's goals and objectives are based on the 2010 Comprehensive Plan, the 2016 Vision Plan, and community input. The goals and strategies focus on community improvement and infill rather than significant urban expansion. New strategies include reducing the municipal growth area and adjusting zoning standards to support urban infill development.
- On page 11, the first objective indicates that the town will establish, in coordination with the county, a "Preserved Land Greenbelt." The county included Map 1-4, Septic Growth Tiers, on page 28 of its draft comprehensive plan. This map does not depict a "Preserved Land Greenbelt" or contain a Tier IVA mapped category. Instead, there are considerable Tier II lands designated around the town, which appears to contradict the town's Rural Buffer map on page 46.
- It is not clear whether the Rural Buffer and "Preserved Land Greenbelt" are intended to be the same thing, or whether the greenbelt includes only portions of the farm parcels identified on page 45. The reference in the text is listed as "(see Map *)." It is unclear whether the intended reference is the Rural Buffer map, a Preserved Land Greenbelt map, or the Septic Growth Tiers map. There is a Growth Area and Greenbelt map in the 2010 Greensboro Comprehensive Plan (page 117), but the town is proposing to remove the growth area as part of this Plan. Have the greenbelt parcels changed? Does any of the former growth area become part of the greenbelt in this Plan?
- The Economic Development Goal on page 13 also references a rural buffer rather than a greenbelt. Map 4 – Land Use Map includes a T-4 "Rural Edge" category, but the description of T-4 on page 23 describes a long-term holding area rather than a permanent greenbelt. The Plan should clarify the relationship between the Rural Buffer, Preserved Land Greenbelt, T-4 Rural Edge, and applicable Tier Map designations and use these terms consistently.

- Also on page 13, for the Historic and Cultural Preservation Goal, MDP recommends the town consider and incorporate resources from the [Maryland Historical Trust](#), which provide planning guidance for flood mitigation and adaptation. Using this tool may help the town better understand risks not previously accounted for and may identify funding resources to support adaptation work.
- MDP supports the Climate Resilience Goal on page 14. Once this Plan is adopted, the town may also consider drafting and adopting a local ordinance, plan, or policy to support this goal. With the passage of SB197/HB243, effective October 1, 2026, a formal Resilience element has been created and is required in subsequent comprehensive plans. MDP may provide technical assistance to Greensboro to support the most applicable incorporation of resilience. MDP may also offer review of proposed local resilience implementation and its alignment with MDP products or other statewide resources. The [DNR Grants Gateway Outcome 2](#) may be a viable program to fund this local effort.

3. 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 found in Chapter 11, page 15. This element describes the future vision for growth and land use within the town. The element includes an existing land use assessment, land use inventory, and vacant land analysis. The Plan provides a roadmap to reorganize the town's zoning into four zoning transects. Transects can be extremely useful in supporting infill development and maintaining community character.

- On page 16, what is the purpose of larger-lot suburban expansion if the town's first core vision, identified on page 6, is "Careful preservation of Greensboro's character and community identity"?
- The description of the T-1 transect zone appears to contradict the existing R-1 zoning district classification. As is common when Euclidean zoning is applied over an existing historic core, current zoning standards can gradually erode the historic character of lot sizes, density, building form, and the mix of uses.
- A future growth strategy could be to evaluate and adjust the town's existing R-1 zoning standards to promote development and redevelopment that is more consistent with the T-1 transect zone. As part of this work, the town could document representative historic density, intensity, lot size, block size, setbacks, building form, and mix of uses and compare

them with the current R-1 zoning standards. This could help identify where current zoning makes the town's established development pattern difficult to maintain or replicate.

Additionally, on page 18, the text states that the town's Euclidean zoning pattern strongly "favors" low-density, single-family use. This could be interpreted as a future growth preference or simply as a description that much of the town is currently allocated or zoned for low-density, single-family residential development. This ambiguity may be cleared up by changing "strongly favors" to "over-allocates land to" low-density, single-family residential use.

- The Existing Land Use map on page 27 is missing a map number, although it is identified as Map 1 in the List of Maps.
- On page 22, the Short-Term Strategies reference "Town Center" and "Historic Commercial/Residential" districts. Are these intended to be existing zoning districts? There are no Town Center or Historic Commercial/Residential zoning districts identified on page 16.

If the underlying zoning districts are to be refined, the Plan should identify the specific existing zoning districts proposed for refinement or indicate that a new Land Development Ordinance zoning category for the T-1 Urban Core transect zone should be established. Establishing a new T-1 Land Development Ordinance zoning category may be the clearer option. This also appears to be consistent with the Zoning and Regulatory Alignment recommendation on page 25 and the Land Use Plan Implementation Strategies on page 101.

Using consistent terminology throughout the Plan text and Map 4 – Land Use Map would also reduce reader uncertainty. Page 18 identifies the transects as four "zones," which is the traditional way of referring to transects. Consider referring to them consistently as "transect zones" or "zones," rather than "districts," which is more commonly associated with Euclidean zoning districts.

- On page 23, the short-term strategy to update the "Suburban Residential" zoning district is unclear. There is no "Suburban Residential" zoning district identified on page 16. Is this intended to refer to the T-3 Suburban transect zone? Consider including a recommendation in the Plan to establish a new T-2 Neighborhood transect zone and evaluate rezoning appropriate areas of the existing R-2/R-3 zoning districts to T-2.
- On page 24, consider establishing a new Special Employment zoning district and recommending that appropriate parcels within this area be rezoned as a unified zone rather than remaining a mixture of Euclidean zoning districts, where applicable.

For the T-4 transect zone, is the "scenic/environmental buffer" intended to be the same area as the "Preserved Land Greenbelt"? If so, consistent terminology should be used.

Also on page 24, T-4 transect zone, Bullet Point #4: The key actions section identifies partners for assistance with easements and funding. MDP recommends adding the Maryland Department of Agriculture as a partner.

- Monitoring, Evaluation, and Adaptive Management (Page 25). In response to the Five-Year Mid-Cycle Report requirement under Land Use Article § 1-207(c)(6), the Plan should include a recommendation to develop an Implementation Matrix and establish measures to evaluate how well the Planning Commission has accomplished, or not accomplished, relevant Plan priorities.

The matrix does not need to be included in the Plan, but the Plan's adopted strategies could be used to create this tool. On page 54, Table 1: Principles, Policies, Standards, Strategies, and Actions may serve as a useful template for an Implementation Matrix. Strategies identified in the Implementation Element could also be included. MDP staff are available to assist.

- Implementation Chapter, Land Use Plan Section, bullet point #2 (page 101): The second bullet point states that the T-4 transect zone should be held as a long-term agricultural/open-space reserve. MDP recommends adding language clarifying that these open spaces, parks, recreational trails, and greenways should be preserved in perpetuity through easements.
- Implementation Chapter, Land Use Plan Section, bullet point #1 (page 102): MDP recommends adding language to collaboratively work with Caroline County to ensure town projects are included in the Caroline County LPPRP for program open space funding consideration.

4. Communities 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

The Community Facilities Element is found in Chapter III, on page 30. This element provides an inventory of water, sewer, parks and recreation, public and safety facilities, schools and religious facilities.

- Sewer System (page 31): It is the intent of the town's Plan to not extend sewer service outside the municipal boundaries. The Plan also indicates, on page 43, that the county's proposed growth area outside the town runs counter to Maryland's Sustainable Growth Principles. The draft June 2026 Caroline County Map 1-4, Sewer Growth Tiers, depicts a large Tier II area surrounding the entire Town of Greensboro and extending farther south toward an area identified for Transfer of Development Rights (TDR).

Has there been any communication with the county about whether these areas are anticipated to receive future sewer service, or the type and density of housing and development envisioned for these locations?

- As part of the Municipal Growth Element preparation, the town and county should follow the applicable § 3-206 meet-and-confer process prior to adoption of the Municipal Growth Element and consider entering into any joint planning agreements that may be needed to coordinate implementation. This should also include any necessary amendments or updates to the Caroline County Master Water and Sewer Plan so that the Municipal Growth Element, Tier Map, and Water and Sewer Plan do not create conflicting expectations for future growth and sewer service.

5. 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 is found in Chapter IV, page 37. This element analyzes development capacity and growth scenarios. This element is recommending a reduction in the town's growth boundary and concentrating future development within the existing municipal boundary as infill development.

- Capacity by Transect (page 37): If portions of the T-3 transect zone are intended to transition into a T-2 transect zone, does the reported development capacity of 120 units increase accordingly?

- On page 23, the T-3 Suburban Residential Short-Term Strategy indicates the potential to address missing-middle housing at densities compatible with the T-2 transect zone. On page 25, the Monitoring, Evaluation, and Adaptive Management section identifies a potential performance indicator of greater than 70% of new residential units being located in the T-1 and T-2 transect zones. However, those transect zones represent only about 42% (90 of 210 units) of the total reported development capacity.

The relationship between these numbers should be clarified. If the 70% target represents the town's preferred future development pattern, the development capacity analysis should determine whether there is enough realistic capacity within T-1 and T-2 to achieve that goal.

Additionally, on page 38, the underutilized land capacity by zoning district references only the R-1, R-2, and R-3 zoning districts and does not appear to include the existing PUD zoning district. However, the growth scenarios beginning on page 39 specifically reference Kinnamon Meadows as a Planned Unit Development (PUD). The capacity analysis should clarify how existing PUD-zoned land and approved but unbuilt PUD development is being counted.

6. 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 provision and review responsibilities to the Maryland Departments of the Environment and Natural Resources.

Plan Analysis

The Sensitive Areas Element is found in Chapter V, page 47. This element addresses habitats for rare, threatened, and endangered species, key wildlife habitats, stormwater management, floodplain protections, and stream tier designations. The element addresses climate change considerations such as increased flooding and sea level rise. The element recommends establishing a Conservation Overlay Zone within Greensboro's Zoning Ordinance.

- MDP commends the town for taking a proactive approach by creating a Conservation Overlay Zone that builds upon and combines existing tools and mapped resources (page 47). The overlay zone will simplify regulations, while protecting and preserving the rural and agricultural areas that buffer the developed town. For this approach to be successful, the town will need to complete the Comprehensive Update to the Zoning Ordinance.
- Map 6, Rural Buffer (page 46): To provide a better illustration of preservation patterns around the town, MDP recommends decreasing the map scale to show the larger geographic area. Also, the map shows there is a property encumbered by a Program Open

Space easement on the western edge of town's jurisdiction. MDP recommends updating the map to include all the preserved land within the town's jurisdiction.

7. Water Resources Element – Synopsis

The Water Resource Element (WRE) is required to consider available data provided by the Maryland Department of the Environment (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. MDE and MDP jointly developed WRE guidance to demonstrate how local governments can ensure compliance with the WRE requirements. Local jurisdictions are expected to implement the most important aspects of the [MDE/MDP WRE guidance](#).

Plan Analysis

The WRE is found in Chapter VI, page 64. In addition to an inventory of existing water wells, water treatment facilities, and sufficiency of water resources, the town indicates that security measures have upgraded to address the protection of the town's water system. The element also highlights the need to address the Tier II watershed surrounding the town.

- Map 10, Habitat Connectivity Network (page 59) has an incomplete map number shown as “*.” Map 10 is also identified as the “Habitat Connectivity Network and Green Infrastructure” map in the List of Maps on page 5. The map title and numbering should be made consistent.

8. 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 is found in Chapter VIII, page 79. With limited transportation facilities and public transportation, the town is focusing on maintenance, safety, sidewalk improvements, and micro-transportation options.

- Map 16, Pedestrian Systems (page 86): This map could benefit from illustrating future pedestrian connections in addition to the existing system.

- The town should consider how to incorporate new development into its existing street grid and bicycle and pedestrian networks.
- The town should consider including a Plan recommendation to create a bicycle and pedestrian master plan to identify gaps in the sidewalk network, needed bicycle infrastructure, and problem crossings and intersections where traffic calming or other infrastructure is needed.
- The town should also consider including Plan recommendations related to bicycle parking and connections to the Greensboro Elementary School.
- The Plan should discuss where the transit network could add potential destinations, such as job centers, retail/goods, and other transit connections not available within the town. This would align with the Transportation goal to “link key destinations” and the objective to “Expand public transit options...”
- For the proposed T-1, T-2, and T-3 transect zones, consider identifying appropriate street typologies and sidewalk systems. In general, conventional zoning standards regulate lots and buildings but do not always address the range of street types needed to support different neighborhood development patterns.
- The City of Aberdeen and Town of Galena have used transect-oriented planning and street typologies for existing neighborhoods and growth areas. These regulations could serve as useful examples for the Town of Greensboro Land Development Ordinance and Town Code when considering street, sidewalk, frontage, and connectivity standards appropriate for the different transect zones. Specifically, the town can view the [2022 City of Aberdeen Comprehensive Plan](#), Chapter 4, Map 4-2, City Zoning, page 4-11; Goal 1, page 4-2; Goal 3, page 4-4; and Chapter 11, Implementation, Land Use Goal 1, Strategies 1 & 2 and Goal 3, Strategies 1-3, page 11-3. The [City of Aberdeen Development Code](#) Chapter 235, Attachment 7 contains multiple maps and Illustrations of transects and street typologies. The Town of [Galena Zoning Ordinance](#), Attachment G – Thoroughfare Dimensional Illustrations.
- Implementation Chapter (page 102 and 104): The town mentions updating prioritization for Capital Improvement Plans (CIP) to incorporate resilience. MDP supports this goal and recommends clarifying whether the Town of Greensboro has developed a prioritization framework for the most urgent resilience projects or if they will simply add identified resilience projects to the CIP moving forward. If Greensboro has a framework for prioritizing resilience projects, it would be valuable to identify whether this framework was developed internally or if the town is using a template/case study from another jurisdiction.

9. 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 also 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 Housing Element is found in Chapter VII, page 72. The element contains a housing profile and an affordability analysis found in Appendix A. Plan strategies include permit streamlining, accommodation of 'missing middle', starter homes, cottage homes and accessory dwelling units.

Affordable Housing

The Maryland Code requires that a municipal comprehensive plan housing element address the need for affordable housing within the jurisdiction, including low-income housing and workforce housing (Land Use § 3-114). It defines low-income housing as "housing that is affordable for a household with an aggregate annual income that is below 60% of the area median income" (Land Use § 3-114). It defines workforce housing as (1) rental housing that is affordable for a household with an aggregate annual income between 50% and 100% of the area median income or (2) homeownership housing that is affordable to a household with an aggregate annual income between 60% and 120% of the area median income (Housing and Community Development § 4-1801). Addressing the need for affordable housing also assists in implementation of Maryland's Housing Planning Principle, which is to "enable a mix of quality housing types and affordability options to accommodate all who want to live in the state" (Land Use § 1-201).

The Plan acknowledges a need for affordable housing and includes an analysis of housing affordability data. For more locally specific data that uses the affordability thresholds identified in the Maryland Code, please refer to [MDP's Housing Data Dashboard](#).

Fair Housing

The Maryland Code requires that local jurisdictions affirmatively further fair housing in their housing and urban development programs (Land Use § 3-114). To affirmatively further fair housing means taking meaningful actions aimed at combating discrimination to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to housing and opportunity based on protected characteristics (Housing and Community Development § 2-401). To this end, the Plan is required to include an assessment of fair housing (Land Use § 3-114).

The Plan appears to include a fair housing assessment and identify recommendations and goals to affirmatively further fair housing.

Best-Practice Comments

In addition to statutory requirements, MDP reviews housing elements for items it considers to be best practice. See MDP's [Housing Element Checklist](#) for details, guidance, and examples of plans that follow these recommendations.

- The Plan addresses many subjects that MDP would recommend for all housing elements: a vision for housing; goals, objectives, and strategies; a plan for implementation of goals, objectives, and strategies; analysis of publicly available housing data; consideration of the role of ADUs in housing; identification of programs supporting housing; and identification and analysis of barriers to housing development.
- MDP recommends that all housing elements include an assessment of implementation of the previous plan's housing goals, strategies, and actions.
- MDP recommends that all housing element assessments of fair housing include some data analysis to substantiate it. See [MDP's guidance on AFFH](#) for recommendations on how to create an assessment of fair housing.
- In its [Housing Production Targets for the State of Maryland](#), the Maryland Department of Housing and Community Development identifies a cumulative target, which DHCD acknowledges in its comment.

10. Growth Tiers - Synopsis

A growth tiers map is not considered adopted until it is incorporated into a comprehensive plan. Therefore, a growth tiers map is required to be included in a jurisdiction's comprehensive plan.

Plan Analysis

- The Plan states that the town, in coordination with the County, has included the adopted Tier Map in the Plan. However, no Tier Map was found in the Plan or identified in the List of Maps on page 5.
- MDP does not have a record of the town previously adopting a Growth Tier Map. If the town does have a Growth Tier Map and wishes to incorporate it into the comprehensive plan, pursuant to § 1-504 the town should submit the adopted Growth Tier Map to MDP for review/comment. It should also be noted that solar facilities larger than 5 MW are not allowed under Maryland law within areas designated as Tier II. Currently, the Caroline County Growth Tier Map has designated land surrounding the Town as Tier II.
- On page 9, Sustainable Growth and Agricultural Preservation Act (SB 236), it should be noted that the applicable Tier Map designations for a municipality are Tier I, Tier II, Tier IIA, and Tier IVA (Greenbelt).

Greensboro is a Sustainable Community

Greensboro has designated a Sustainable Community area. As part of the Sustainable Community designation, quality of life, environment, economy, transportation, housing, planning and land use, and local capacity are all subjects of the action plan. MDP suggests the town review the Action Plan for consistency with the draft plan and consider how the action plan and the financial incentives provided in the Sustainable Communities designation can support plan implementation.

Contact the Maryland Department of Housing and Community Development, Sustainable Communities Program for more information: <https://dhcd.maryland.gov/Communities/Pages/dn/default.aspx>

**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 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 as soon as possible.

Attachments

Maryland Department of Transportation

Maryland Department of Natural Resources

Maryland Department of Housing and Community Development

Maryland Department of Environment

August 25, 2026

Mr. David Dahlstrom
c/o Rita Pritchett
Maryland Department of Planning
120 E. Baltimore Street, Suite 2000
Baltimore MD 21202

Dear Mr. Dahlstrom:

Thank you for coordinating the State of Maryland's comments on the Town of Greensboro Comprehensive Plan. The Maryland Department of Transportation (MDOT) offers the following comments on the Comprehensive Plan for consistency with the State of Maryland and MDOT's goals and objectives.

General Comments

- In general, the Comprehensive Plan is consistent with MDOT plans and programs.
- Offering transportation options and 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. The MDOT manages several active transportation programs:
 - Transportation Alternatives (TA) Program: a reimbursable, federally funded program for local sponsors to complete community projects designed to strengthen the intermodal transportation system. The program provides funding for projects that enhance the cultural, aesthetic, historic, and 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 the total project as a match.
 - Recreational Trails Program: a federally funded program that the Maryland State Highway Administration (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. The MDOT's Kim Lamphier Bikeways Network Program: a program that allocates State transportation funds administered by the MDOT Secretary's Office to promote biking as an alternative transportation mode.

- Resources are available from SHA to assist in the development of bicycle and pedestrian infrastructure within designated areas of the State. Please coordinate with Mr. Nate Evans, Assistant Chief, Regional and Intermodal Planning Division (RIPD), SHA, at 410-545-8494 or nevans2@mdot.maryland.gov.
- Commuter Choice Maryland is MDOT's Travel Demand Management (TDM) program, and it could be incorporated into the Plan as a strategy to support the plan. The program offers an extensive menu of commuter transportation services, such as ridesharing and incentives. Please visit the Commuter Choice Maryland web site at <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=29> for more information.
- The MDOT supports continued improvements to expand and enhance transit options. Please coordinate with the Maryland Transit Administration (MTA) Office of Statewide Planning for any coordination regarding regional transit and the coordination of MDOT supported locally operated transit services (LOTS). The MTA also supports park and ride (with SHA), demand response services, paratransit, medical services, and senior center transportation options. For regional transit planning, please contact Mr. Stephen Miller, Chief of Strategic Planning, via email at SMiller6@mdot.maryland.gov or phone at 410-767-3869. For local transit service planning, please contact Mr. Jason Kepple, MTA Regional Planner, via email at Jkepple@mdot.maryland.gov.
- A Transit Oriented Development (TOD) Program was established within MDOT to provide services including identifying potential TOD opportunities and evaluating existing and future needs of public transportation facilities. For TOD related data resources please visit the Transit Oriented Development in Maryland web page: <https://data-maryland.opendata.arcgis.com/pages/tod>
- Relative to MDOT implementing resilience strategies and initiatives to withstand the impacts of climate change on transportation infrastructure, please review SHA Climate Change Vulnerability online ArcGIS web application map: <https://maryland.maps.arcgis.com/apps/webappviewer/index.html?id=86b5933d2d3e45ee8b9d8a5f03a7030c>. The 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. To review other MDOT Climate Change programs and to access this information please visit: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=169>.
- Consider adopting the MDOT Complete Streets initiative. The Complete Streets initiative identifies a range of options for multimodal transportation, which includes active transportation (i.e., human-powered mobility such as biking or walking) during roadway improvement delivery. To review other resources and access this information, please visit: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=207>.
- The 2050 Maryland Statewide Bicycle & Pedestrian Master Plan (BPMP) provides target goals for transportation-related infrastructure projects. Please visit: https://www.mdot.maryland.gov/OPCP/MDOT_State_Bike_Ped_Master_Plan_FULL_FINAL_VERSION.pdf.

- These goals include:
 - Leveraging active transportation investments for building sustainable, equitable, and resilient communities;
 - Improving the safety of active transportation travel;
 - Better integrating of active transportation and micromobility considerations in project/program procedures; and
 - Encouraging short- and long-distance active transportation trips through better connected networks.
- The MDOT recommends county and municipal agencies consider the 2050 Maryland Statewide Bicycle and Pedestrian Master Plan in its comprehensive plan development. Generally, the Town of Greensboro 2050 Comprehensive Plan addresses the State's 2050 BPMP goals. The MDOT recognizes the Town's suggestion of a pilot program for an e-bike/scooter share program to enhance multimodal travel and create ways for residents to enjoy short trips within downtown Greensboro. Please also consider consulting the Office of Active Transportation and Micromobility (OATM) in Maryland.
- The Town of Greensboro plans to pursue the following design elements, including, specifically, reconstructed sidewalks, Americans with Disabilities Act (ADA) compliant sidewalks, micromobility parking corrals, improved bicycle lanes, and curb ramps, in addition to incorporating shared-use paths into the Town's planning practices and future roadway work. These align with SHA's recommended countermeasures, as profiled in the Context Driven Toolkit additional context-sensitive safety countermeasures as they relate to active transportation and micromobility. Please visit:
<https://experience.arcgis.com/experience/769bd85416ff4e46bf3cb78a67ed4640/>.
 - The MDOT recognizes the Town's documentation of gaps in the bicycle system and encourages the use of resources such as the Bicycle Infrastructure Gap Analysis to help identify other areas to assist in increasing bicycle accessibility. Please visit:
<https://fitp.maps.arcgis.com/apps/instant/sidebar/index.html?appid=15ad5a70d0234da58d88cd173e0cd86b>.
 - The MDOT recognizes that the Town is primarily located in a rural setting and has stated its intention to create better ways to improve short trips. Please also consider consulting the Short Trip Opportunity Area (STOA) when in the planning and design phases of any newly proposed pedestrian and/or bicycle routes and paths. Please visit:
<https://fitp.maps.arcgis.com/apps/instant/sidebar/index.html?appid=15ad5a70d0234da58d88cd173e0cd86b>.
- The MDOT recommends the Town consider applying Safe Routes to School (SRTS) framework as a tool to increase safety in school zones by prioritizing safety improvements for walking and biking around schools and using non-engineering solutions including education and encourage for young vulnerable roadway users. Funding is available through the Transportation Alternative Program. Please visit:
<https://roads.maryland.gov/mdotsha/pages/index.aspx?PageId=144>.

- The MDOT recommends the Town consider reviewing eligibility requirements for the following grant programs which provide funding for projects with active transportation and/or micromobility components:
 - Recreational Trails Grants Program
 - Kim Lamphier Bikeways Network Program
- The Oxford Line is within the town limits. The Maryland Transit Administration (MTA) owns the line, which is railbanked. Railbanking allows for trail use on rail corridors while keeping open the possibility of a return to freight or passenger rail service in the future.
- The MDOT's Office of Rail and Intermodal Freight (ORIF) serves as the Oxford Line trail sponsor. Please contact ORIF if interested in rail-trail development.
- Please use the following acronyms
 - Maryland Department of Transportation (MDOT)
 - State Highway Administration (SHA)
 - Maryland Transit Administration (MTA)

Detailed Comments

- **Page 80 - Traffic Volumes**
 - Consider using Annual Average Daily Traffic (AADT) instead of Average Daily Traffic (ADT).
- **Page 83 - Road Maintenance and Upgrades**
 - Recommend removing first use of “resurfacing” as MD 404 PEL study is not a resurfacing project.
- **Page 85 - Map 15**
 - MD 313 is shown as a minor collector but is classified as a Minor Arterial in SHA’s database.
 - Roads that will change classification:
 - MD 480 (Main St) from MD 314 (Sunset Avenue) to Wood Duck Drive; Minor Collector to Major Collector.
 - MD 314 (Sunset Avenue) from Cosden Street to Main Street; Minor Collector to Major Collector.
- **Pg. 81 - Pedestrian/Bicycle Circulation:** Segments of MD 314 and MD 313 in Greensboro are roadways that meet the criteria for bike activities.
- **Pg. 90-91 - Heritage and Eco-Tourism:** Segments of MD 313 are part of America's Byways. Consider adopting or updating Scenic Byways Signage. For more information about Scenic Byways, please visit SHA Welcome to Maryland’s Scenic Byways webpage located <https://roads.maryland.gov/mdotsha/pages/Index.aspx?PageId=97>.

Mr. David Dahlstrom
Page Five

Thank you again for the opportunity to review the Comprehensive Plan. If you have any additional questions or concerns, please do not hesitate to contact Mr. Ryan Iacaruso, Transportation Planner, MDOT Office of Planning, Programming, and Project Delivery (OPPPD) at 410-230-6606, or via email at riacaruso@mdot.maryland.gov. Mr. Iacaruso will be happy to assist you.

Sincerely,

A handwritten signature in black ink that reads "Geoff Anderson". The signature is written in a cursive, flowing style.

Geoff Anderson
Chief, OPPPD, MDOT

cc: Ms. Marissa Brown, Rail Program and Policy Manager, RIPD, MDOT
Mr. Nate Evans, Assistant Division Chief, RIPD, SHA
Ms. Kandese Holford, Director, OATM, MDOT
Mr. Ryan Iacaruso, Transportation Planner, OPPPD, MDOT
Mr. Dan Janousek, Regional Planner, OPPPD, MDOT
Mr. Joseph Lombardo, Active Transportation Planner, OATM, MDOT
Ms. Michelle D. Martin, Planning Director, OPPPD, MDOT
Ms. Thomasina Saxon, Executive Administrative Assistant, SHA
Mr. Derrick Sexton, Capital Program Analyst, OPPPD, MDOT



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

Maryland Department of Planning
120 E. Baltimore Street
Suite 2000
Baltimore, MD 21202

Memo: MD DNR comments on Draft Greensboro 2050 Comprehensive Plan

To: David Dahlstrom
cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on Draft Greensboro 2050 Comprehensive Plan update. The letter was distributed to appropriate contacts at the Maryland Department of Natural Resources and reviewed. DNR offers the following comments, suggestions, and resources:

Fishing and Boating Services (FABS), Fisheries Ecosystem Assessment Division reviewed the plan and noted that the upper Choptank River provides critical spawning habitat for major runs of anadromous fish (White Perch, Yellow Perch, Blueback Herring, Alewife, and Hickory Shad) through Greensboro. Runoff from Greensboro drains into downstream American Shad and Striped Bass spawning and nursery areas. These anadromous fish (fish that live in saltwater and ascend freshwater rivers and streams to spawn) are of concern for fisheries managers because of their declining baywide spawning success, sensitivity to spawning and larval habitat degradation from development, added habitat stress from climate change, and their past, present and future importance to Maryland. Fishing for these species is a popular and well-known activity at Christian (Red Bridges) Park and at the Choptank River Park where the Greensboro boat ramp is located. These runs attract local and nonlocal anglers to Greensboro. Warmwater fisheries also provide popular activity throughout the rest of the year.

The target level of development for a watershed with healthy aquatic habitat is 5% impervious surface (IS) or less, which translates to 0.14 structures per acre (C/ac). Once development reaches a threshold of 10% IS and 0.34 C/ac, there are increasingly negative and intractable aquatic habitat issues. The upper Choptank River watershed is at 4.0% IS. Locally, a few smaller tributaries are at or exceeding 5% IS. Local jurisdictions should strive to minimize increases in impervious surface within the watersheds. DNR research shows that effective stormwater practices are unlikely to mitigate impervious surfaces to the extent where it can completely offset negative effects on fisheries and biodiversity. The implementation of stormwater management practices should not encourage development up to 10% IS.

Local jurisdictions are encouraged to follow the principles of promoting development within town centers over expansion. This helps to manage increases in impervious surface, conserving forests and agricultural land beneficial to fisheries. We appreciate that the town is emphasizing infill development and has wastewater treatment capacity to accommodate it.

The FABS division developed a few guiding documents that may be of use for the resource friendly planning:

Tawes State Office Building – 580 Taylor Avenue – Annapolis, Maryland 21401
410-260-8DNR or toll free in Maryland 877-620-8DNR – dnr.maryland.gov – TTY Users Call via the Maryland Relay

Watershed Development Guidelines for Anadromous Fish Spawning -

https://dnrweb.dnr.state.md.us/archive/fisheries/WatershedDevelopmentGuidelines_AnadromousFishSpawningStreams.pdf

Maryland Department of Natural Resources Planning Guidance to Promote Resource Protection in Sensitive Watersheds -

https://dnrweb.dnr.state.md.us/archive/fisheries/GeneralizedRecommendations_complete.pdf

Maryland Non-tidal Stream Anadromous Fish Spawning Tool (mapping) -

<https://experience.arcgis.com/template/8b13df5918be4e288fb3439a2afc3153/>

Wildlife and Heritage Service (WHS) complements the Town of Greensboro for incorporating the conservation of Habitats of Threatened and Endangered Species and for encouraging their protection through easements and through coordination with DNR's Natural Heritage Program (NHP) on the review of site plans within the Sensitive Species Project Review Areas (SSPRA), per the text on page 54. At the bottom of page 49, the term "DNR's Heritage and Biodiversity Conservation Program" is outdated and no longer used. This should be updated to DNR's Natural Heritage Program. The Wildlife and Heritage Service works with the state Critical Area Commission on guidance for Habitat Protection Areas within the Critical Area. A Critical Area Habitat Protection Area called the Upper Choptank River Listed Species Site is found within the northeastern corner of the Town of Greensboro, within the SSPRA area. Please contact Lynn Davidson (lynn.davidson@maryland.gov) if you need information about this site.

Land, Acquisition and Planning (LAP) provided the following comments: If there is any potential change to park land that has Community Parks and Playground (CPP) or Program Open Space Local (POS) funding please contact our office to ensure compliance. This comprehensive plan meets our requirements. No further comments.

Thank you for the opportunity to provide these suggestions. If you have any questions about these comments or would like further information, please do not hesitate to contact me at 410-260-8718 or leah.sheppard@maryland.gov.

Best,
Leah Sheppard

August 13, 2026

Mr. David Dahlstrom
Upper Shore Regional Planner
Maryland Department of Planning
120 E. Baltimore Street
Suite 2000
Baltimore, MD 21202

Dear Mr. Dahlstrom:

Thank you for the opportunity to review and comment on the Greensboro 2050 Comprehensive 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. House bill 1045 passed in 2019 requires that all comprehensive plans enacted after June 1, 2020 include a housing element that addresses the need for workforce and low-income housing. House bill 90, passed in 2021 requires local governments to provide an assessment of fair housing to the Maryland Department of Housing and Community Development as part of the housing element. For more information regarding this requirement, please refer to the Maryland Department of Planning's [AFFH guidance for comp plans](#). The housing element of the Plan appears to satisfy these requirements. For questions and technical assistance in development of the Plan's Housing Element, please contact Carter Reitman at the Maryland Department of Planning, Carter.Reitman2@maryland.gov.
3. The Plan identifies a need to revitalize the community through adaptive reuse 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 Maria Mougridis, maria.mougridis@maryland.gov.

4. 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. Facade improvements are referenced as a revitalization strategy at several points in the Plan, however, the Town has not applied for an award through State Revitalization Programs administered by DHCD since 2023. Planning staff can learn more about MFIP online at <https://dhcd.maryland.gov/Communities/Pages/StateRevitalizationPrograms/MFIP.aspx> or by contacting Maria Mougridis, maria.mougridis@maryland.gov.
5. The Plan identifies a goal to support sustainable housing that enables seniors to age in place. DHCD can assist with home repairs that improve comfort, livability, and accessibility for homeowners through its Repair Programs for Homeowners. Planning staff and residents can learn more about these programs at <https://dhcd.maryland.gov/Energy-Home-Repair/pages/homeowner-loans/default.aspx> or contact the program directly at 301-429-7409 or DHCD.SpecialLoans@maryland.gov.
6. The Plan does not show that Greensboro has conducted a point-in-time count to identify the total number of people experiencing homelessness in Greensboro, 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 who need assistance should contact 2-1-1 Maryland: Dial 211. This is the statewide helpline that connects callers to local emergency shelter openings, housing programs, and essential services across Caroline County.
7. The Plan identifies the community's needs with respect to income and poverty. The Town of Greensboro or non-profits active in Greensboro 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 housing, including workforce and low-income housing. Greensboro currently has one 40 unit development financed with the help of Low Income Housing Tax Credits (Greensboro Heights). If planning staff want to support



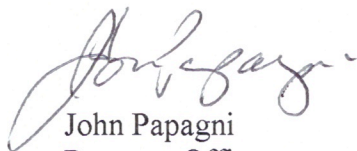
further affordable housing development with LIHTC or other DHCD programs, information is available online at <https://dhcd.maryland.gov/HousingDevelopment/Pages/lihtc/default.aspx> or contact Edward Barnett, Director of Rental Lending, at 301-429-7740 or edward.barnett@maryland.gov.

10. The Plan indicates the Town's interest in Maryland Main Street designation. More information on the revitalization benefits associated with this designation can be found online at <https://dhcd.maryland.gov/communities/pages/programs/mainstreet.aspx>.
11. 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/NBW.aspx> or by contacting DHCD's Business Lending Team at 301-429-7408 or dhcd.businesslending@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/Energy-Home-Repair/pages/homeowner-grants/default.aspx>.
13. The Plan identifies the need for public infrastructure improvements. The Maryland Local Government Infrastructure Finance Program provides low-interest, long-term bond financing for smaller municipalities and counties. It supports essential projects like water/sewer systems, public facilities, and equipment, often pooling demand to reduce costs. For more information contact Charles Day, charles.day@maryland.gov
14. The Maryland Department of Housing and Community Development's "Housing Starts Here" report, published in January 2026 identifies housing production needs by county, including the need to produce an additional 13,742 units in Caroline County by 2030. The Town of Greensboro should consider how community development initiatives in Greensboro can help meet that demand. For more information go to: <https://dhcd.maryland.gov/HousingStartsHere/Pages/default.aspx>



We in the Division of Neighborhood Revitalization look forward to continuing our productive partnership with Greensboro 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 john.papagni@maryland.gov or 443-257-1682 .

Sincerely,



John Papagni
Program Officer
Division of Neighborhood Revitalization

Cc: Joseph Griffiths, Maryland Department of Planning
Rita Pritchett, Maryland Department of Planning
Carter Reitman, Maryland Department of Planning
Maria Mougridis, DHCD Division of Neighborhood Revitalization
Olivia Ceccarelli, DHCD Division of Neighborhood Revitalization





Local Plan Review: Draft Greensboro 2050 Comprehensive Plan

Maryland Department of the Environment – WSA/WPRPP

REVIEW FINDING: REVIEW FINDING: R1 Consistent with Qualifying Comments

(MD20260729-0481)

R1 -

The current County Water and Sewer Plan (W&S Plan) has been amended to include connections to northern areas of the County like Henderson, Marydel, and Templeville. The Draft Town Comprehensive Plan indicates this connection is not currently moving forward but a local facility is instead proposed. Once a decision is made, the Town should update the Comprehensive Plan.

The County's overall update of the W&S Plan is overdue. The W&S Plan incorporates the Town's water and sewer information. The Town should work with the County to update any information regarding the Town and its infrastructure when the County is updating the W&S Plan.



Maryland

Department of the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary
Adam Ortiz, Deputy Secretary

Local Plan Review: Draft Greensboro 2050 Comprehensive Plan

Maryland Department of the Environment – WSA/WPRPP

REVIEW FINDING: REVIEW FINDING: R1 Consistent with Qualifying Comments

(MD20260729-0481)

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 Forge Branch 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 Preliminary Report Form and its applicability to the project before proceeding with the more detailed review analysis explained below.

[Tier II Preliminary Report Form](#)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 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 qualify for a determination of no additional Tier II review, at a minimum 8(c) on the form, must apply.

[Tier II No-Discharge Analysis Form](#)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](#)³

¹

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

²

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

³

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

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.
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](#).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.
5. Additional guidance and forms to help navigate the mitigation process are now available for download from the [Tier II High Quality Waters](#)⁵ webpage under the “Other Tier II Resources” tab.

Forge Branch 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).

Currently, there is assimilative capacity in this watershed; therefore at this time, for all projects that will not require a nontidal wetlands or waterways construction permit or authorization, no detailed social and economic justification is needed.

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

⁵ https://mde.maryland.gov/programs/water/tmdl/waterqualitystandards/pages/antidegradation_policy.aspx

[Fee Legislation Update](#)⁶ (Nontidal Wetlands and Waterways Construction Permits)

1. The Maryland General Assembly approved updates to the fee structure established in the Maryland Environment Article 5–203.1 for Wetlands and Waterways projects during the 2025 Legislative Session ([House Bill 352](#)⁷ of 2025, beginning on pg. 40). These adjustments will ensure the continued high level of service to the regulated community by supporting program capacity and resources. The updated fees aim to reduce delays and improve the overall efficiency of the permit review process.
2. The fee for a minor project or minor modification is **\$400.00**, and the fee for a major project or major modification is **\$1,600.00**. Certain public entities are fee-exempt. This will be determined at the time of permit application.
3. This review is required regardless of assimilative capacity status.

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>

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://mde.geodata.md.gov/TierIIHQWaters/>).

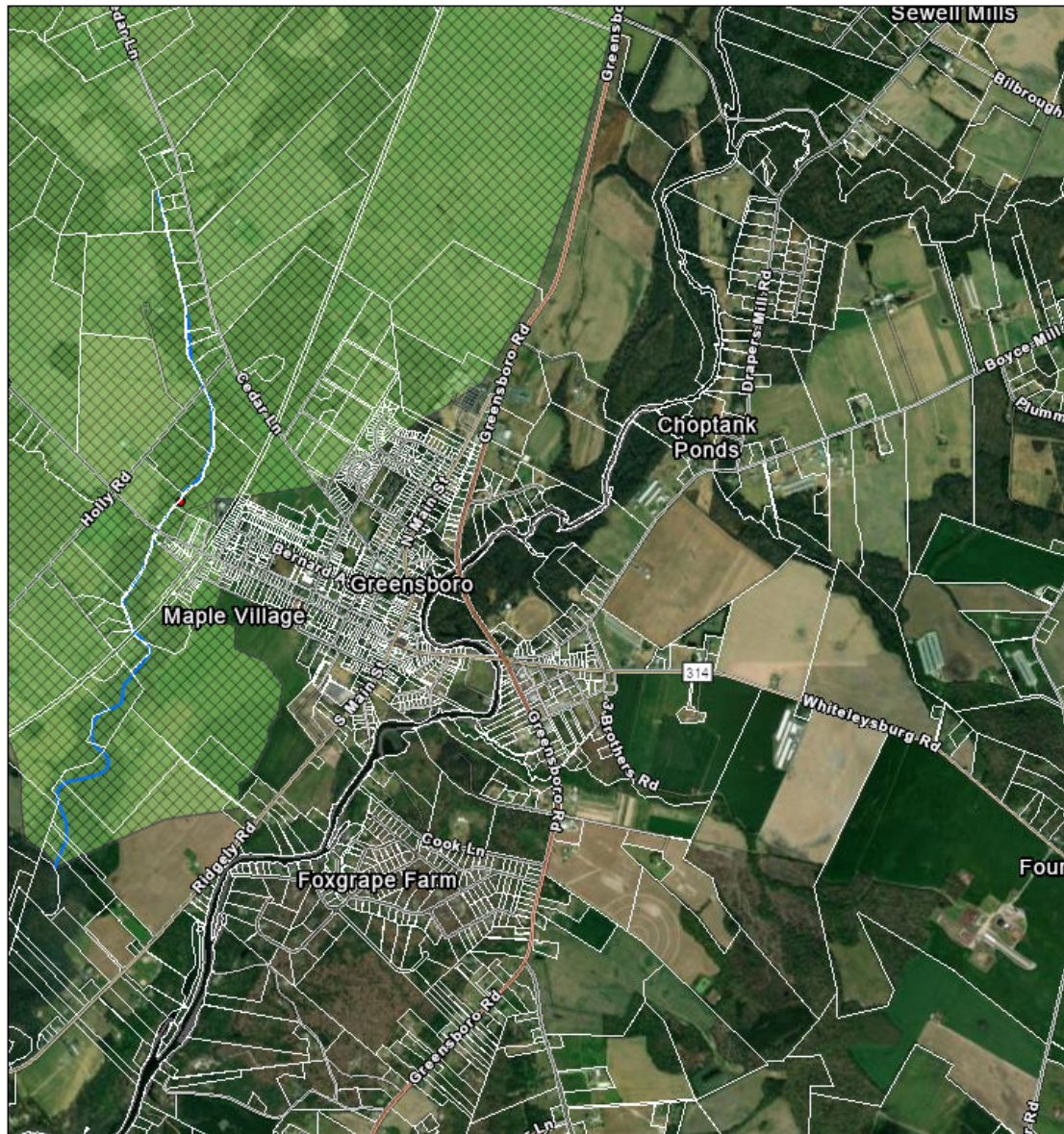
Direct any questions regarding the Antidegradation Review to Angel Valdez via email at angel.valdez@maryland.gov, or by phone at 410-537-3606.

⁶ <https://mde.maryland.gov/programs/water/WetlandsandWaterways/Pages/Fee-Schedule.aspx>

⁷ <https://mgaleg.maryland.gov/2025RS/bills/hb/hb0352e.pdf>

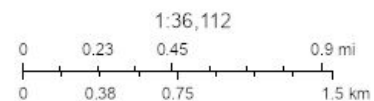
The map below shows the project area located in the specified tier II watershed. The map title includes the clearinghouse ID and the watershed or watersheds of concern. The key contains the parcel boundaries, specifics color for tier II watersheds that do or do not have assimilative capacity, tier II stream segments, and tier II baseline stations. There is also a scale bar and ArcGIS and MDE credentials.

MD20260729-0481 - Forge Branch 1



8/20/2026, 8:09:29 AM

- MD_ParcelBoundaries - Parcel Boundaries
- Tier II Assimilative Capacity Catchments
 - Assimilative Capacity Remaining
- Tier II Stream Segments
- Tier II Baseline Stations
- Maryland County Boundaries



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, OpenStreetMap contributors, and the GIS User Community. Creator: Maryland Department of the Environment, Water and Science Administration (MDE WSA), MD IMAP, SHA, DoIT, VGIN, Vantor

Web AppBuilder for ArcGIS

MD IMAP, SHA, DoIT | Creator: Maryland Department of the Environment, Water and Science Administration (MDE WSA) | MD IMAP, MDR, SDAT | VGIN, Vantor | Esri Community Maps Contributors,



Local Plan Review: Draft Greensboro 2050 Comprehensive Plan

Maryland Department of the Environment – WSA/WPRPP

REVIEW FINDING: R1 Consistent with Qualifying Comments
MD20260729-0481

Please be advised, the property or properties in MD20260729-0481 is/are in close proximity to Flood Zone AE (100-year Floodplain) and X (500-year Floodplain). The project coordinator(s) should follow local floodplain ordinances and Federal Emergency Management Agency's guidelines and standards.

It is advised that the coordinator(s) 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 coordinator(s) is advised to State National Flood Insurance Program Coordinator, in MDE's Stormwater, Dam Safety, and Flood Management Program, at flood.maps@maryland.gov for additional information regarding the regulatory requirements for Floodplains and Storm Surges.

The coordinator(s) 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.

The image below depicts the area of project site that is impacted by flooding as determined by the Coast Smart CRAB tool.



MDE Comments for Clearinghouse Project Review: Local Plan Review: Draft Greensboro 2050 Comprehensive Plan

Response Code: C-1, R-1

1. Any aboveground or underground petroleum storage tanks, must be installed and maintained in accordance with applicable State and federal laws and regulations, including COMAR 26.10-Oil Pollution Control and Storage Tank Management. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition – Any aboveground or underground petroleum storage tanks systems must be closed in accordance with COMAR 26.10.01 through 26.10.18. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. 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.
4. 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.
5. Any contract specifying “lead paint abatement” must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1978 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.
6. 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.
7. The project may cause contaminated runoff from an animal feeding operation (AFO). Please contact the AFO Division at (410) 537-4423 to determine if this AFO will require registration under the General Discharge Permit for Animal Feeding Operations.
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.

Accessibility Report

Filename: Draft Greensboro_2050_Comprehensive_Plan_versions 7-25-26 CORRECTED 07.27.26.pdf

Report created by: [Enter personal and organization information through the Preferences > Identity dialog.]

Organization:

Summary

The checker found problems which may prevent the document from being fully accessible.

- Needs manual check: 2
- Passed manually: 0
- Failed manually: 0
- Skipped: 0
- Passed: 12
- Failed: 18

Detailed Report

Document

Rule Name	Status	Description
Accessibility permission flag	Passed	Accessibility permission flag must be set
Image-only PDF	Passed	Document is not image-only PDF
Tagged PDF	Failed	Document is tagged PDF
Logical Reading Order	Needs manual check	Document structure provides a logical reading order
Primary language	Failed	Text language is specified
Title	Failed	Document title is showing in title bar
Bookmarks	Failed	Bookmarks are present in large documents
Color contrast	Needs manual check	Document has appropriate color contrast

Page Content

Rule Name	Status	Description
Tagged content	Failed	All page content is tagged
Tagged annotations	Passed	All annotations are tagged
Tab order	Passed	Tab order is consistent with structure order
Character encoding	Passed	Reliable character encoding is provided
Tagged multimedia	Passed	All multimedia objects are tagged
Screen flicker	Passed	Page will not cause screen flicker
Scripts	Passed	No inaccessible scripts
Timed responses	Passed	Page does not require timed responses
Navigation links	Passed	Navigation links are not repetitive

Forms

Rule Name	Status	Description
Tagged form fields	Passed	All form fields are tagged
Field descriptions	Passed	All form fields have description

Alternate Text

Rule Name	Status	Description
Figures alternate text	Failed	Figures require alternate text
Nested alternate text	Failed	Alternate text that will never be read
Associated with content	Failed	Alternate text must be associated with some content
Hides annotation	Failed	Alternate text should not hide annotation
Other elements alternate text	Failed	Other elements that require alternate text

Tables

Rule Name	Status	Description
Rows	Failed	TR must be a child of Table, THead, TBody, or TFoot
TH and TD	Failed	TH and TD must be children of TR
Headers	Failed	Tables should have headers
Regularity	Failed	Tables must contain the same number of columns in each row and rows in each column
Summary	Failed	Tables must have a summary

Lists

Rule Name	Status	Description
List items	Failed	LI must be a child of L
Lbl and LBody	Failed	Lbl and LBody must be children of LI

Headings

Rule Name	Status	Description
Appropriate nesting	Failed	Appropriate nesting

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