

CONEWAGO TOWNSHIP PLANNING COMMISSION
ADAMS COUNTY
541 OXFORD AVENUE, HANOVER, PA 17331

July 14, 2020

1. COMMENCE OF SPECIAL MEETING

The Special Meeting of the Planning Commission for, July 14, 2020 was called to order by Mr. Strevig at 6:00 PM in the Conewago Township Administration Building at 541 Oxford Avenue, Hanover, PA.

The following Planning Commission Members were in attendance:

John Strevig, Chair Person
Alisha Gouker, Vice Chair
Richard Neiderer
Tom Klunk

The following individuals were also in attendance:

David Arndt, Jr., Zoning/Code Enforcement Officer/BCO
Tim Shultis, Township Solicitor
Charlotte Shaffer, Board of Supervisor Chairperson

There were 0 persons in the audience due to Covid-19. The meeting was livestreamed on the Township Facebook page.

John Strevig turned the meeting over to Tim Shultis, the Township Solicitor.

Tim Shultis advised the board of editorial corrections that were made to the proposed Ordinance 2020-C and also mentioned the three letters that were received by the Township. A letter dated July 8, 2020 from The Bare Development, LP, a letter dated July 13, 2020 from Attorney Office of McNees, Wallace and Nurick, LLC and a letter dated July 14, 2020 from the Adams County Office of Planning and Development. It was asked by the Planning Commission to include a copy of these three letters with the minutes. Mr. Shultis asked Dave Arndt if any other emails, fax or comments by mail have been received by the Township up to this point. Mr. Arndt advised there wasn't any received to his knowledge.

2. PUBLIC COMMENT ON AGENDA ITEMS

Mr. Shultis asked if there was any public comment via Facebook Livestream. Supervisor Shaffer advised there is 8 people watching and no public comment at this time.

Esch McCombie, of McNees, Wallace and Nurick LLC sent a public comment through Facebook livestream referencing the letter dated July 13, 2020 mentioned above.

3. ZONING ORDINANCE AMENDMENT

Mr. Strevig opened the discussion by asking for a copy of the three letters mentioned above to be included with the minutes of this meeting. Mr. Strevig then asked for any discussion on the ordinance or the three letters received. Mr. Neiderer asked why this rezoning topic is back on the table again. He mentioned that he was not in favor of the properties being rezoned from A – Agricultural to R-1 –Suburban Residential during the rezoning that took place in 2019 but was under the impression that it was done and complete and now it's back for discussion? Mr. Strevig stated that the current Board of Supervisors voted to revisit the subject again and see if the properties should go back to the A – Agricultural Zone. Mr. Shultis stated the Board of Supervisors voted to advertise a proposed ordinance for a public hearing that will be coming up at the end of month. It was mentioned that in July 2019 when the property was rezoned to residential, there was public involvement and some opposition of the rezoning of the parcels and with a change of the members of Board of Supervisors with a different planning perspective, the current board is proposing an ordinance that will rezone the 5 properties back to the A- Agricultural Zoning District. There was some concerns about how the past rezoning took place. Mr. Shultis stated the Board of Supervisors have advertised for a public hearing scheduled for July 27, 2020 and a

recommendation can be made by the Planning Commission to them in favor or not in favor of the proposed Ordinance 2020-C.

A motion was made by Mrs. Gouker, with the motion seconded by Mr. Strevig to recommend to the Board of Supervisors to keep the 5 properties in the R1 – Suburban Residential Zone and not approve Ordinance 2020-C.

Vote: 3-1 with Mr. Klunk voting against

4. PUBLIC COMMENT

No comment

5. ANNOUNCEMENTS

- ▶ The Board of Supervisors meeting – 7•20•20 at 6:30 PM.
- ▶ The Zoning Hearing Board meeting - 8•5•20 at 6:00 PM.
- ▶ The Planning Commission meeting - 8•6•19 at 6:00 PM.

A motion to adjourn at 6:47 PM was made by Mr. Klunk, with the motion to adjourn seconded by Mrs. Gouker.

Vote: 4-0

Respectfully submitted,

David Arndt, Jr.
Zoning/Code Enforcement Officer/BCO

BARE DEVELOPMENT, LP

CONEWAGO TOWNSHIP

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July 8, 2020

<p>Conewago Township Board of Supervisors 541 Oxford Avenue Hanover, PA 17331</p> <p>Thomas Weaver, Vice Chair Conewago Township Board of Supervisors 541 Oxford Avenue Hanover, PA 17331</p> <p>Don Knight, Supervisor Conewago Township Board of Supervisors 541 Oxford Avenue Hanover, PA 17331</p>	<p>Charlotte Shaffer, Chair Conewago Township Board of Supervisors 541 Oxford Avenue Hanover, PA 17331</p> <p>Louann Boyer, Supervisor Conewago Township Board of Supervisors 541 Oxford Avenue Hanover, PA 17331</p> <p>Thomas Klunk, Supervisor Conewago Township Board of Supervisors 541 Oxford Avenue Hanover, PA 17331</p>
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Dear Board:

Given the discussion about zoning in Conewago Township, we felt it important to share some facts about the history of the 126 acre property along Oxford Avenue owned by Bare Development, LP (tax parcel 08-K13-0060)(the "Property"). It has been said at recent Township meetings that nothing had been done with the property for years so re-zoning would not be of much consequence. It has also been said that the current zoning of this property is not consistent with the comprehensive plan. As detailed in this letter, both of these statements are incorrect and we feel it is critical that as the Township Supervisors make decisions regarding the future development and land use in the Township, they do so based on the facts.

By way of background, the Property was originally acquired in 1961 by Radio Hanover, Inc. ("RHI"). RHI was a Bare family holding. In 2008, the Property was transferred from RHI to Bare Development, LP, the current owner, and another Bare family holding. For nearly 60 years, the Property has been held by our family, the Bare family, as an investment. During this time, the family has worked with numerous Township officials with the express intent to someday develop the Property for residential use. Rights of way have been given to accommodate growth in the Township with documented evidence that the Bare family intended to one day develop the Property for residential use and connect to these same utilities. We have letters going back to 1983 that discuss the intent for a regional sewer line that crosses the Property to be used for residential hookup for 50 years. In 1995, the Township manager Ed Calvert, approached us about sharing in the cost to lower the gravity main along Oxford Road to accommodate the development of the Property west of Oxford Road. We agreed to share in these costs. Later in

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1995, Mr. Calvert again approached us, this time to suggest that we talk to Tom Comitta who prepared the 1996 Comprehensive Plan, about the development of the Property. This began several years of studying a possible Traditional Neighborhood Development (“TND”). There is no doubt that our family has been preparing for the eventual development of the Property as a residential community for at least 30 plus years. The careful consideration of the proper time and manner for developing the property should not be confused with a lack of intent or desire to develop it, especially when the owner of the property has expended significant time and money for the future development of the Property.

As far as the zoning and planning for the Property itself, the Property’s proximity to other residential neighborhoods, McSherrystown Borough and Hanover Borough makes it a logical extension for development. Dating back to 1996, the Township’s comprehensive plan shows the Property in the Primary Growth Area. The Comprehensive Plan suggested that the way to control growth management in the Township was to hold the line on the limit to extensive growth to areas of existing infrastructure, areas of existing compact development and areas which are relatively free of environmental constraints. Areas like the Property. At the time, the Property was zoned Agricultural Residential which allowed single family homes on 40,000 square foot lots.

In 1998, the Township began to consider rezoning. At this time, we, as the owners of the Property, and others adjoining it, expressed our dissent to any effort to rezone the tracts. In 1999, the Township maintained the east side of Oxford Avenue as Agricultural Residential and rezoned the west side to Agricultural Preserve and the northern part of the west side to R-2, splitting the Property into three separate zones.

In 2006, the Township started to work on a new comprehensive plan. Again, we were involved in this process and worked hard on their TND process. When the plan was adopted in April of 2008, we were surprised that our land had been removed from the Primary Growth Areas. In August of 2009, the Supervisors unanimously approved an amendment to the Comprehensive Plan to re-instate the Primary Growth Area (which although referenced is curiously absent from the plan on the Township’s website) and adopted a revised zoning map placing the Oxford Avenue land in R-1 Suburban Residential where it remains today. Accordingly, the current zoning is consistent with the comprehensive plan adopted over 10 years ago.

In summary, the timeline for the Property’s zoning and comprehensive plan over the past 25 years is as follows:

1996 – Comp Plan - Primary Growth Area

Zoning –Agricultural Residential – allowing for single family homes on 40,000 sq. ft. lots. This zoning dates back to at least 1983, nearly 40 years ago.

1999 Zoning – East Side of Oxford Avenue remains the same, west side Agriculture Preserve, and northwestern portion Village Center Residential.

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2008 – Comp Plan – Agricultural Preserve

2009 – Amended Comp Plan – Primary Growth Area

Zoning – Amended to R-1 Suburban Residential where it has remained for the past decade.

We respectfully ask that the Township Supervisors consider the fact that we have spent many years preparing for the eventual development of the Property for residential use. This preparation occurred in many instances through cooperation with the Township and the Township knew throughout this period that we intended to develop the Property. While we recognize and appreciate that the Board and current staff has not been involved during this entire process, we hope the Supervisors now have a better understanding as to the history of the Property and respectfully request that the zoning remain consistent with the zoning throughout most of our ownership of the Property. This Property is and has always been a major asset of our family and was purchased and held with the intent of maximizing our return through the development of the Property for residential purposes. We hope you understand and agree that our holding the Property in its current state should not be used against us as justification to rezone its use. As stated in the prior Comprehensive Plans, the Property remains ideal for development and it is our hope and plan to eventually do so.

Thank you.



Joan Bare McAnall

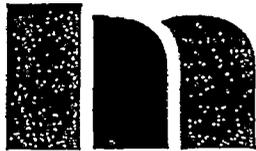
Cell # (717)476-3930



Barbara Bare Carbaugh

Cell # (717)817-1374

Cc: Conewago Township Planning Commission
✓ John Strevig, Chair, Conewago Township Planning Commission
Alisha Gouker, Vice Chair, Conewago Township Planning Commission
Tom Klunk, Conewago Township Planning Commission
Dick Neiderer, Conewago Township Planning Commission
David Arndt, Jr., Zoning Officer
Timothy J. Shultis, Esquire



McNees
Wallace & Nurick LLC

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July 13, 2020

VIA E-MAIL & UPS

Planning Commission
Conewago Township
541 Oxford Avenue
Hanover, PA 17331

**RE: Klunk Farm Rezoning
Our File No. 34679-0001**

Dear Planning Commission Members:

We represent Racehorse Road LLC ("Racehorse"), which is the owner of an approximately 85-acre tract of land located along the southern side of Hanover Road (SR 0116) in Conewago Township (the "Township") identified as Adams County Tax Parcel No. 08K15-0004--000 (the "Property"). The Property sometimes is referred to as the Klunk Farm based on prior ownership. The Property is in the Township's Suburban Residential - R-1 zoning district (the "R-1 District"). The new Board of Supervisors regime now seeks to adopt special legislation to rezone the Property to the Agricultural - A zoning district (the "A District") less than one year after the Property was zoned into the R-1 District. The purpose of this letter is to express Racehorse's opposition to this proposed special legislation.

By way of background, Racehorse intends to develop the Property into a residential community. The Property was rezoned into the R-1 District in August 2019 (the "2019 Rezoning"). Racehorse made a significant investment in acquiring the Property in December 2019 in reliance on the 2019 Rezoning. In addition to the investment required to purchase the Property, Racehorse has invested in environmental studies and engineering efforts in preparation for developing the Property. Racehorse presented a sketch plan for the development of the Property to the Board of Supervisors in November 2019. On June 24, 2020, Racehorse submitted a preliminary subdivision plan for the development of the Property in accordance with the R-1 District zoning designation and standards.

The current R-1 District zoning classification was the result of a thorough, contemplative, and deliberate rezoning process completed by the Township in 2019. The 2019 Rezoning was recommended for approval by the Township's Planning Commission on two separate occasions in February 2019 and August 2019. The 2019 Rezoning also was recommended by the Adams County Planning Commission (together with a suggestion that the Township's Comprehensive Plan be updated at the same time). The Adams County Planning Commission recognized that

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the 2019 Rezoning was consistent with the Adams County Comprehensive Plan. More importantly, the Adams County Planning Commission recognized that the 2019 Rezoning would be sound community planning because the tracts to be rezoned – including the Property – are located between existing development and are surrounded by the Suburban Residential designation in the Township's Comprehensive Plan.

The R-1 District zoning classification was adopted by the Township in August 2019. Now, less than a year later, after the general election and legal proceedings to resolve the composition of the new Board of Supervisors regime, there is an effort to reverse the 2019 Rezoning. This is despite the fact that all of the reasons outlined above by the Adams County Planning Commission in their support of the 2019 Rezoning remain unchanged today.

The effort to reverse the 2019 Rezoning is led by newly seated Supervisor Thomas Weaver. Supervisor Weaver has demonstrated a clear bias against the development of the Property and all forms of residential development in the Township. Supervisor Weaver – as a member of the public - spoke in opposition to the 2019 Rezoning. During the November 18, 2019 Board of Supervisors meeting, Supervisor Weaver (not yet a member of the Board of Supervisors at that time) went so far as to inquire as to his rights to appeal the 2019 Rezoning.

Mr. Weaver's efforts to prohibit the development of the Property and oppose residential growth in the Township have continued in 2020 since being seated as a member of the Board of Supervisors. On March 16, 2020, Supervisor Weaver made a motion to have the Township's solicitor draft an ordinance establishing a 10-year moratorium on residential development on tracts over five acres in the Township. Had this effort been pursued the Township likely would have ended up embroiled in lawsuits as moratoriums on development are illegal in Pennsylvania. Having been advised that moratoriums on development are illegal in Pennsylvania, Supervisor Weaver scaled back his ambitions but remain focused on the Property and other tracts in the Township that were rezoned to the R-1 District in the last ten years.

At the April 20, 2020 Board of Supervisors meeting, Supervisor Weaver made a motion to have the solicitor draft an ordinance rezoning the Property and other tracts to the A District to prevent residential growth in the Township. The April 20 meeting was held virtually on the Township's Facebook page. Supervisor Weaver's motion was not among the topics listed on the agenda for the meeting. Moreover, Racehorse's public comments made to the motion went unanswered during the meeting.

At the May 18, 2020 Board of Supervisors meeting, Supervisor Weaver made a motion again to have the solicitor draft an ordinance rezoning the Property along with other tracts along Rt. 116 and a tract next to the Township building – all in an effort to stop residential development. That motion died for lack of a second. Supervisor Weaver did not relent and made a second motion, this time to have the solicitor draft an ordinance rezoning just the Property and other tracts along Rt. 116 that were included in the 2019 Rezoning. At all times since the 2019 Rezoning, the

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zoning classification and development of the Property have been in Supervisor Weaver's crosshairs.

The Township now has advertised an ordinance to be considered at a public hearing on July 23, 2020 to essentially reverse the 2019 Rezoning less than one year after it was adopted. The Township also has retained the professional services of a community planner to testify at the public hearing at a cost of \$4,700. This cost is in addition to whatever legal fees have been incurred so far in 2020 as Supervisor Weaver explored efforts to impose an illegal moratorium and now to sponsor this illegal special legislation.

Racehorse acknowledges that any Township decision to zone property is a legislative decision to which the Board of Supervisors are entitled some discretion. That being said, the legislative discretion exercised by a governing body when zoning property is not absolute discretion. Decisions regarding the zoning classification of property cannot be arbitrary, capricious, or discriminatory. Moreover, zoning classifications cannot be used as special legislation to strip away the property rights of landowners in an effort to prevent specific projects.

Supervisor Weaver opposed the 2019 Rezoning, considered appealing it, and now has engaged in a relentless effort to prevent residential development in the Township – or at the very least to prevent the development of the Property. Supervisor Weaver is leading the Township down a path that could result in costly litigation. This personal crusade to prevent the development of the Property goes beyond any reasonable or legitimate effort at community planning.

The Planning Commission should stand behind the recommendations it made twice in 2019 for the Property to be zoned in the R-1 District and should choose not to participate in Supervisor Weaver's crusade.

Sincerely,

McNEES WALLACE & NURICK LLC



By

Jonathan D. Andrews

c: Mr. Ben Myers (via e-mail)
James M. Strong, Esq. (via email)
John D. Runge, Jr. (via e-mail)
Timothy J. Shultis, Esq. (via e-mail)
Kurt Williams, Esq. (via e-mail)

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ADAMS COUNTY OFFICE OF
PLANNING AND DEVELOPMENT

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Sherri Clayton-Williams, AICP, Director

DATE: July 14, 2020

TO: Conewago Township Supervisors
Conewago Township Planning Commission
Andrew D. Merkel

FROM: Andrew D. Merkel, AICP
Assistant Director

SUBJECT: County Review
Conewago Township
Zoning Ordinance Map Amendment
Suburban Residential (R-1) District to Agricultural (A) District
File ORD-20-022

In accordance with Section 609.e. of the Pennsylvania Municipalities Planning Code (Act 247 of 1968, as amended), and following a review of the Adams County Comprehensive Plan and other relevant documents, the Adams County Office of Planning and Development held a staff meeting to review the above-referenced zoning amendment and offers the following comments:

Introduction: On *May 13, 2019*, the Planning Office reviewed a proposed Zoning Map Amendment to re-zone five (5) parcels totaling 202.41 acres along the south side Route 116 and to the west of McSherrystown Borough from the Agricultural (A) District to the Suburban Residential (R-1) District. We understand this Amendment was adopted in August 2019 as *Ordinance 2019-A*. The currently proposed Zoning Map Amendment would result in the complete reversal of the *Ordinance 2019-A* and rezone the same five (5) parcels from Suburban Residential (R-1) back to Agricultural (A). We offer the following comments on the proposed map amendment for the Township's consideration.

A. *Consistency with County Comprehensive Plan.* The properties proposed to be rezoned from R-1 to A are located in the *Borough/Village/Crossroad Center (Mixed Use), Residential – Medium Density, and Residential – Medium-Low Density* categories of the Land Use Plan element of the County Comprehensive Plan. As noted in our *May 13, 2019* review, rezoning this area to R-1 would be consistent with the intent of the County Comprehensive Plan for this area. Therefore, rezoning this area back to the A District is inconsistent with the Land

Use Plan element of the County Comprehensive Plan. These five (5) parcels are a prime opportunity to use a smart growth planning policy centered around existing borough and village core areas to protect agricultural lands elsewhere in the Township. Specifically, these parcels are:

1. Directly adjacent to an existing Borough Core setting (McSherrystown Borough).
2. Bordering existing public sewer and water service areas.
3. Contiguous with public recreation areas.
4. Surrounded by existing residential and commercial development on 3 out of 4 sides.

These four factors make this setting a prime location for infill development. Retaining the existing R-1 District would be consistent with the future development patterns envisioned by the County Comprehensive Plan.

Conversely, returning this area to the A District could push future development further out into more remote areas of the Township, including into closer proximity to the Hanover Shoe Farms setting to south and further into existing karst geology areas to the north. Such a development pattern would represent the opposite of a compact, Smart Growth oriented development pattern, impact a regionally significant agricultural setting and would not be consistent with the future development patterns envisioned by the County Comprehensive Plan.

B. *Consistency with Township Comprehensive Plan.* We acknowledge that the current Township Comprehensive Plan identifies these five (5) parcels in the *Agricultural* category of the Future Land Use Plan. We further acknowledge that the Agricultural (A) District would be the Zoning District that is most consistent with the Future Land Use Plan of the existing Township Comprehensive Plan. We finally acknowledge that the appropriate order for the planning process would be for the Township to complete the review and update to the Township Comprehensive Plan first. Updates to the Zoning Ordinance should then follow after the Comprehensive Plan has been updated.

C. *Status of Township Comprehensive Plan Update.* We understand that the Conewago Township Planning Commission (PC) has been conducting a review and update of the 2008 Township Comprehensive Plan since approximately October 2016. Based on published PC minutes, it appears that the Future Land Use Component was first discussed in or around June 2017. Further, at the time of our *May 13, 2019* review letter, the Township indicated to us that the proposal to rezone these five (5) parcel from the A District to the R-1 District was done at the request of the owners of one or more these five parcels and was consistent with discussions held by the PC regarding expansion of future growth areas during process of reviewing and updating 2008 Township Comprehensive Plan. That said, we have seen reports indicating that the Township is considering pursuing a new update to its Comprehensive Plan. Is the PC's review and update of the 2008 Comprehensive Plan still ongoing or has it been abandoned in favor of a new planning process?

Further, we also note that there have been reports of the Township wanting to rezone other areas of the Township to be consistent with the Future Land Use Plan of the 2008 Comprehensive Plan. Should such further map changes be made in addition to the currently proposed map change, we would be concerned that eliminating all area of "inconsistency" between the Comprehensive Plan and the Zoning Ordinance will result in the Township placing all potential developable properties within the Township within the Agricultural (A) District. Such changes would likely be considered exclusionary and, as such, would not be policy changes that we would support.

D. *Impact of Agricultural (A) District.* In Comment B, we acknowledged that the Agricultural (A) District is the Zoning District that is most consistent with the Future Land Use Plan of the existing Township Comprehensive Plan for this setting. However, that does not mean that the A District is the most appropriate zoning district for this setting when considering the context of the area surrounding these five (5) parcels. Specifically, the A District permits intense uses such as Concentrated Animal Operations (CAOs), Concentrated Animal Feeding Operations (CAFOs), Manure Storage Facilities and Alternative Energy Production Facilities. These uses are not compatible in close proximity to dense residential areas. We note that these five (5) parcels are surrounded by developments such as Allwood Manor, The Villas at Cattail, Indian Ridge, Murren Manor, Granny Estates, and The Preserves in Conewago Township, and multiple apartment complexes and individual residential units in McSherrystown Borough. There are multiple examples throughout Adams County where locating agricultural districts in close proximity to designated growth areas has resulted in incompatible land uses being built near each other.

E. *Ordinance 2020-C.* The submission to the Planning Office included a copy of Ordinance 2020-C for review. We offer the following comments for the Township's consideration:

1. *Consistency Between Comprehensive Plan and Zoning Ordinance.* The third "Whereas" Page 1 of the draft ordinance indicates that Ordinance 2019-A was and remains inconsistent with the 2008 Township Comprehensive Plan. Additionally, the final "Whereas" of Page 2 indicates the Ordinance 2019-A was "ill-timed". As planners, we support the planning principle that a Comprehensive Plan, as a policy document, should come first and the Zoning Ordinance, a police power document, should follow and be implemented consistently with the Comprehensive Plan. However, we note that *Section 303(c)* of the *Pennsylvania Municipalities Planning Code (MPC)* indicates that no action of a governing body shall be invalid on the basis of inconsistency with the Comprehensive Plan. Further, *Section 303(d)* of the *MPC* states that municipal zoning shall only "generally implement" the Comprehensive Plan. While, professionally, we support the notion that a zoning ordinance should be consistent with the Comprehensive Plan, inconsistency between the Zoning Ordinance and Comprehensive Plan alone does not automatically invalidate an ordinance or amendment.

2. *Adams County Agricultural Preservation Priority Area (PPA) Map.* Page 2 of the draft ordinance includes a reference to *Resolution No. 17 of 2013* which references the Adams County PPA Map. The PPA Map is a tool used specifically during the evaluation process of the Adams County Agricultural Conservation Easement Purchase Program. The PPA Map is intended to be a dynamic tool that is updated prior to each Ag Land Preservation Program Application Round. It is not a static tool intended to direct overall County Land Use Policy. It is not a replacement for the Adams County Comprehensive Plan as the formal land use policy document for Adams County. The reference on Page 2 implies that the PPA Map has more policy standing than the County Comprehensive Plan. This is not the case.

Recommendation: In *Comment A* we identified a number of planning policy reasons why these five (5) parcels should be retained in the R-1 District rather than be rezoned into the A District. *Comment D* further identifies some policy concerns to consider with re-implementation of the A District in this setting. Further we also note that the proposed Zoning Map Amendment would result in a Township Zoning Map that is inconsistent with the Future Land Use element of the Adams County Comprehensive Plan.

In *Comment B* we acknowledge that a Zoning Ordinance should be implemented in a manner consistent with the Comprehensive Plan, a position we also identified in our *May 13, 2019* review letter. We reiterate our previous position that the Township should focus on completing the Township Planning Commission's review and update of the Comprehensive Plan and turn its focus on the Zoning Ordinance only after the Comprehensive Plan has been updated.

For this Office to support the proposed Zoning Map Amendment, we would need to ignore the Land Use Plan element of the County Comprehensive Plan, which identifies these parcels in a Designated Growth Area. Therefore, since the current zoning map, at the subject location, is consistent with the County Comprehensive Plan, we cannot support the adoption of the proposed Zoning Map Amendment as it would return this setting to a designation that is inconsistent with the County Comprehensive Plan. Thus, we recommend against adoption of the proposed amendment, and further recommend that the Township continue and complete work on updating the Township Comprehensive Plan before any further zoning map amendments are considered.

cc: Timothy J. Shultis, Township Solicitor
Racehorse Road LLC, Deed #6567-0112
SAVES, Deed #5472-0228
150 Carlisle Street LLC, Deed #6165-0725
Patrick F. Murren, et al., Deed #0580-0156
William H. Rittase, Deed #0387-0556