



JANUARY 8, 2025

EXECUTIVE SUMMARY OF
DOCUMENT UPDATES FIRST DRAFT
TO FINAL DRAFT
2040 COMPREHENSIVE PLAN

WASHINGTON COUNTY, MARYLAND | DEPARTMENT OF PLANNING
AND ZONING

WASHINGTON COUNTY, MARYLAND



SUMMARY

This summary outlines the key changes between the two drafts of the Washington County 2040 Comprehensive Plan. The changes reflect updates, clarifications, and shifts in focus to align with strategic goals outlined for each topic while incorporating stakeholder, public and Planning Commission comments.

OVERALL PUBLIC COMMENT SUMMARY

STAKEHOLDER COMMENTS RECEIVED

There was a total of 289 comments. These resulted in approximately 74 document text changes, 4 map updates and 6 table updates. The comments were across all chapters of the document with the top 3 chapters for comments, in order, being Housing (Chapter 6), Land Use (Chapter 14) and Implementation (Chapter 15). Stakeholders included:

- Antietam Creek Watershed Alliance
- Beaver Creek Watershed Alliance
- Sierra Club - Maryland
- Catoctin Land Trust
- Greater Hagerstown Committee
- Hagerstown Community College
- Historic Advisory Committee of Washington County
- Historic District Commission of Washington County
- Save Historic Antietam Foundation
- Washington County Soil Conservation District

AGENCY COMMENTS RECEIVED

There was a total of 207 comments. These resulted in approximately 90 text changes, 13 map updates, and 12 table/chart/data updates. The comments were across the majority of the document chapters with the top 3 chapters for comments, in order, being Historic (Chapter 5), Transportation (Chapter 7) and Land Use (Chapter 14). Agencies included:

- City of Hagerstown
- Washington County Division of Public Works
- Hagerstown Regional Airport
- Maryland Department of Housing and Community Development
- Maryland Department of Natural Resources
- Maryland Department of Planning
- Maryland Department of the Environment
- Maryland Historical Trust
- Washington County Public Schools

CITIZEN COMMENTS

There was a total of 29 comments received in written format via mail or email. These comments do not include specific land use map change requests. The topics covered by these comments include:

- Safe infrastructure for pedestrians and cyclists
- Traffic and pedestrian safety concerns for Route 11, especially as alternative route to I81 during incidents
- Opposition to tractor trailer truck parking
- Opposition to additional warehousing or conversion of land for warehousing
- Ensuring congruence of residential and commercial development with existing neighborhoods
- Concerns with narrow definitions in Business-Commercial Mix and Commercial/Industrial categories.
- Importance of flexible zoning like Heavy Industrial (HI) [sic] for retail and service tenants with warehousing.
- Allow future expansion as infrastructure becomes available.
- Developers and property owners should cover infrastructure and environmental costs.
- Meeting specific feedback:
 - Ensure all employees are identifiable at public meetings
 - Revise Future Land Use map for readability

LAND USE MAP CHANGE REQUESTS

There were 16 individual land use map change requests received. Each were discussed separately by the Planning Commission in Workshops. Results of these workshops discussions are reflected in the future land use map and workshop minutes are available on the Planning Commission webpage.

The changes highlighted in this document are meant to provide general guidance on changes made between the first draft and the final draft. They are not inclusive to all plan updates. Staff recommends that interested parties read the final draft section of interest and provide comment accordingly.

01- SNAPSHOT

PUBLIC COMMENT SUMMARY

No comments resulting in changes.

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

None

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

None

RECOMMENDATION UPDATES

None

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from the previous draft.

02 - INTRODUCTION

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- Maryland Department of Planning

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

None

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

FIGURES

- 2-2 County Organizational Figure updated

RECOMMENDATION UPDATES

None

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

03 - VISIONS, GOALS & OBJECTIVES

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- Maryland Department of Planning

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

None

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

None

RECOMMENDATION UPDATES

None

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

04 - EXISTING CONDITIONS

PUBLIC COMMENT SUMMARY

No comments resulting in document changes

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

None

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

None

RECOMMENDATION UPDATES

None

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

05 - HISTORIC

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- Maryland Historical Trust
- Save Historic Antietam Foundation
- Washington County Division of Public Works
- Washington County Historic District Commission
- Washington County Historic Advisory Committee

There was a total of approximately 37 items for update in the chapter with the majority of those changes from Maryland Historical Trust related to improvements in organization and clarification in descriptions within the chapter. There were also several comments regarding policies for demolition and chapter analysis of the subject.

STRUCTURAL ADJUSTMENTS

- Historic Resource Inventories Section was reorganized to remove Maryland Register of Historic Properties, at the request of the Maryland Historical Trust reviewer.
- The Washington County Historic Sites Inventory was added to clarify that the County has its own inventory which has been included in the Maryland Inventory of Historic Properties. Sections previously under the Maryland Inventory of Historic Properties have been reorganized under the County's Historic Sites Inventory section to enhance readability and logical flow.
- Reorganized the County Policies, Programs and Regulations section to improve understanding of the role of the Historic District Commission
- Various minor sections were reorganized to improve flow and align similar topics.

CONTENT UPDATES

- Updates were made to the Evolution of Washington County history section specifically Early Settlement, Agricultural Development and Other Early Economies and The Civil War.
- National Register of Historic Places language has been updated to be consistent with State and Federal language and also to include more clear Section 106 language.
- National Historic Properties replaced with term "Landmarks" and language updated regarding the distinction during Section 106 review.
- Reference to State Planning Document Heritage2031 and its data were included under the Washington County Historic Sites Inventory section.
- Consolidated and reduced the Federal Policies, Programs and Regulations section
- Revised the State Policies, Programs and Regulations section to emphasize that Maryland Heritage Areas Authority is distinct from Maryland Historical Trust.
- Proposed thematic updates to inventories, targeting underrepresented resource categories like 20th-century structures.
- Revised and expanded historic resource incentives opportunities.

POLICY REFINEMENTS

- Revised demolition section with additional language and proposed programs.
- Proposed the addition of areas similar to the Antietam Overlay to other areas of high historic context such as historic roadways and rural village approaches.

VISUAL ADDITIONS AND UPDATES

MAPS

- 5-1 Washington County Historic Site Inventory Map including National Register of Historic Places map added

TABLES

- 5-4 Historic Rural Village Table revised to include status of survey adoption by the County. The Rural Villages' Maryland Inventory of Historic Properties Number and Year of Survey as well as other information regarding remaining villages to be surveyed was also added.

RECOMMENDATION UPDATES

- Added a recommendation for pursuit of updates to the demolition policy while pursuing incentive-based programs for historic resources.

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

06 - HOUSING

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- City of Hagerstown
- Maryland Department of Housing and Community Development
- Maryland Department of Planning
- Greater Hagerstown Committee
- Home Builders Association of Washington County

There was a total of approximately 10 items for update in the chapter while the remaining comments would be addressed in a future Housing Study for the County or required no document changes.

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

- The Affordable and Workforce Housing | Area Median Income (AMI) section has been updated based on 2024 AMI as requested by Maryland Department of Planning.
- A section was added for Environmental Justice Measures discussing their definition and the status of these concerns in the County by Census Tract.
- School enrollment data was updated.

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

MAPS

- Added Environmental Justice Scores by Census Tract map

RECOMMENDATION UPDATES

- Includes a new recommendation to address environmental justice concerns, particularly in central Hagerstown.
- Includes a new recommendation to create high-quality communities through improved urban design and development standards.

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

07 - TRANSPORTATION

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- City of Hagerstown
- Washington County Division of Public Works
- Hagerstown Regional Airport
- Maryland Department of Planning
- Greater Hagerstown Committee
- Homebuilders Association of Washington County
- Antietam Creek Watershed Alliance
- Beaver Creek Watershed Alliance
- Sierra Club of Maryland

There was a total of approximately 29 items for update in the chapter while the remaining comments will be implemented or supported with specific functional plans later. There was extensive citizen comment regarding the movement of freight particularly along Interstate 81 and truck parking. Pedestrian safety and safety along alternate routes to interstates were also topics included in citizen comment.

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

- Freight Movement subheading of Truck Parking has more language added regarding parking shortages and consideration for siting needed truck parking including site design. The section also includes a summary of recent changes to County regulations for truck parking and truck parking specifications.
- Rail Freight Issues section was updated to include increased narrative on the topic including analysis of rail incidents.
- A new section discussing the Regional Freight Plan 2023 by the HEPMPO which includes discussion of freight employment and infrastructure, planned freight development, critical freight corridors, and candidate critical freight corridor recommendations.
- A new section discussing other future transportation trends was added which includes discussion of electric vehicles and micromobility.

POLICY REFINEMENTS

- The plan was updated to incorporate public comment regarding the movement of freight and concerns regarding truck parking by referencing and incorporating data from the newly completed study by the Hagerstown Eastern Panhandle Metropolitan Planning Organization (HEPMPO).

VISUAL ADDITIONS AND UPDATES

CHARTS

- 7-7 Percentage of Total Freight Employment by NAICS Land Use chart added

MAPS

- 7-5 Priority Corridors for Safety Improvements updated for readability
- 7-10 Existing Bicycle, Pedestrian and Trail Facilities symbology updated
- 7-11 Regional Truck Parking updated symbology for readability and addition of Truck Parking Problem Areas
- 7-12 Active Railroads symbology updated
- 7-13 Rail Incidents map added
- 7-14 Freight Employment Locations map added
- 7-15 Planned Freight Development map added
- 7-16 Existing Electric Vehicle Charging Stations and Targeted Areas map added

TABLES

- 7-9 Revised Top Washington County Corridors Identified by Public Comments for Bike and Pedestrian Needs from the HEPMPO Direction 2050 LRTP to only include Washington County locations for readability
- 7-10 Washington County Sidewalk Improvements updated to 2025-2032 CIP funding amounts
- 7-11 Freight Employment Typology by 2022 NAICS Codes table added
- 7-12 Existing Critical Urban and Rural Freight Corridors table added
- 7-13 Priority Freight Corridors table added
- 7-14 Candidate Critical Urban Freight Corridors table added

RECOMMENDATION UPDATES

- New recommendation to implement the recommendations of the MPO's Transit Development Plan and Human Service Transportation Plan added.
- Language added to existing recommendation "Demand responsive micro-transit options, similar to the employment or health care shuttles provided by various community organizations around the Urban Growth Area, may offer a more cost-effective model to address transit needs in certain areas of the county."
- New recommendation to work with HEPMPO to consider feasibility of transit plans that would connect commuters with employment centers along the I-81 corridor.
- Language added to existing recommendation "Amendment of the Zoning Ordinance to require provision of [Bicycle, Pedestrian and Trail] facilities in specified zoning districts with accompanying design standards offers another potential route for increasing bicycle and pedestrian infrastructure."
- New recommendation to continue to monitor and make capital improvements to at-grade railroad crossings to promote multi-modal transportation safety added.

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- New recommendation to work collaboratively with the HEPMPO and MDOT to identify priority locations for Electric Vehicle charging infrastructure along designated corridors and within local communities and make improvements where necessary. Determine whether any changes to development regulations are needed to facilitate the inclusion of such facilities at appropriate locations during the site planning review process.

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

08 - COMMUNITY FACILITIES

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- City of Hagerstown
- Washington County Division of Public Works
- Hagerstown Regional Airport
- Maryland Department of Planning
- Washington County Public Schools
- Greater Hagerstown Committee
- Homebuilders Association of Washington County

There was a total of approximately 12 items for update in the chapter while the remaining comments will be implemented or supported with specific functional plans later.

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

- Revised the description of the Marshall Street School to incorporate the Washington County Job Development Center (JDC) program
- Public Education Facility Needs and Projection Analysis | Enrollment Projections were updated to reflect requested changes by Washington County Public Schools within the data period of the Comprehensive Plan. WCPS also provided revisions to text in this section which were incorporated.
- Other Social Service Providers section updated with additional providers
- Cultural Facilities section updated to include Meritus Park.

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

MAPS

- 8-4 Middle School District and Schools map updated to revise labeling
- 8-7 Fire and Rescue Companies in Operation map updated.

TABLES

- 8-3 City of Hagerstown Fire Department table updated

RECOMMENDATION UPDATES

- New recommendation to ensure new facilities are sited and designed to encourage diversity and accessibility and are inclusive of the County's diverse population added.
- New recommendation to coordinate with surrounding towns in housing planning and uniform enforcement of mitigation techniques.
- New recommendation added to adjust ordinances and policies to ensure communication technology compatibility with land uses, as well as encourage new technologies which improve connectivity for residents.

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

09 - ECONOMIC DEVELOPMENT ELEMENT

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- City of Hagerstown
- Washington County Division of Public Works
- Hagerstown Regional Airport
- Hagerstown Community College
- Greater Hagerstown Committee

There was a total of approximately 19 items for update in the chapter while the remaining comments will be implemented or supported with specific functional plans later.

STRUCTURAL ADJUSTMENTS

- Capacity for Future Non-Residential Development was moved from the Land Use Element to this chapter to improve narrative and enhance discussion of economic strategies.
- Targeted Economic Development areas were revised to ensure narrative and corresponding map are on the same page.

CONTENT UPDATES

- Added Healthcare and Social Assistance to Targeted Economic Sectors
- Removed reference to OnTrack in Workforce Training and Development
- Revised the Associated Builders and Contractors (ABC) of Cumberland Valley Barr Construction Institute in the Technical and Trade Schools section.
- Added the D.M. Bowman Family Workforce Training Center as a resource for Technical and Trade Schools section.
- Urban Revitalization/Municipalities section has been updated to include narrative on Meritus Park in Hagerstown and the C&O Canal Headquarters in Williamsport.

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

MAPS

- 9-3 through 9-8 Targeted Economic Development Areas Map symbology updated; 9-8 Mount Aetna Technology Park (MATH) map added.

TABLES

- 9-9 Non Residential Capacity Analysis table added.

RECOMMENDATION UPDATES

- New recommendation to ensure Hagerstown Regional Airport has sufficient lands to support continued airport operations to FAA standards, compatible adjacent land uses and identified areas for expansion through updated studies.

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

10 - MINERAL RESOURCES

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- Maryland Department of Planning

There was a total of approximately 2 items for update in the chapter.

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

None

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

None

RECOMMENDATION UPDATES

- Recommendation added to consider the adoption of regulations to address new innovative strategies.
- Recommendation added to investigate implementation of buffers or other protective measures in mining overlay zones for watershed protection.

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

11 - AGRICULTURAL AND FOREST RESOURCES

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- Washington County Division of Public Works
- Maryland Department of Planning
- Antietam Creek Watershed Alliance
- Beaver Creek Watershed Alliance
- Sierra Club of Maryland

There was a total of approximately 2 items for update in the chapter.

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

- Land Preservation Program section has been updated with language discussing easement priority ranking and proximity to growth areas best planning practices.
- Vertical farming technology has been added to the narrative regarding Supporting Agricultural Operations.
- Payment-in-lieu program narrative was updated regarding the function of PIL program and its objectives to both protect forest and water quality.

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

None

RECOMMENDATION UPDATES

None

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

12 - SENSITIVE AREAS

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- City of Hagerstown
- Maryland Department of Planning
- Washington County Soil Conservation District
- Antietam Creek Watershed Alliance
- Beaver Creek Watershed Alliance
- Sierra Club of Maryland

There was a total of approximately 11 items for update in the chapter.

STRUCTURAL ADJUSTMENTS

- Special Planning Areas now includes its own recommendation section.

CONTENT UPDATES

- Special Planning Area Recommendations section was added which now includes Proposed Watershed Protection Special Planning Areas and corresponding narrative. The previous recommendation to review and update potentially removing Edgemont Reservoir watershed has been removed.

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

MAPS

- 12-9 Proposed Watershed Protection Special Planning Areas map added.

RECOMMENDATION UPDATES

- Sub-recommendation added for the creation of Watershed Protection Special Planning Areas, to provide broader water quality protection and conservation of riparian and aquatic habitats in high quality County watersheds.
- Utilize Federal and state level programs such as Environmental Site Assessments, Rural Legacy Program and others to enhance sensitive area protection.

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

13 - WATER RESOURCES ELEMENT

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- City of Hagerstown
- Maryland Department of Planning
- Antietam Creek Watershed Alliance
- Beaver Creek Watershed Alliance
- Sierra Club of Maryland

There was a total of approximately 26 items for update in the chapter.

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

- Water Quality Criteria has the addition of text discussing polyfluoroalkyl or PFA substances.

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

TABLES

13-5 Wastewater Treatment Plant Capacity - Current and Projected revised to include previously missing municipal data

13-6 Watershed Impairments has been removed in lieu of detailed tables under Water Quality Monitoring and Assessment section.

RECOMMENDATION UPDATES

- Recommendation added to Coordinate with the City to explore funding opportunities such as loans or grants to upgrade the city water treatment facility to serve UGA.

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

14 - GROWTH MANAGEMENT AND LAND USE

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- City of Hagerstown
- Washington County Division of Public Works
- Maryland Department of Planning
- Historic Advisory Committee of Washington County
- Greater Hagerstown Committee
- Homebuilders Association of Washington County
- Catoctin Land Trust
- Antietam Creek Watershed Alliance
- Beaver Creek Watershed Alliance
- Sierra Club of Maryland

There was a total of approximately 26 items for update in the chapter. The citizen comments mentioned were related to restricting warehousing as land use. Comments on map readability were also made and the map has been updated.

STRUCTURAL ADJUSTMENTS

- Zoning has been separated from the Development Capacity Analysis to ensure that existing land use is compared to future land use and the analysis does not include zoning categories.
- The Growth Projections and Scenarios section now has projected growth trends in populations and households discussed prior to land use projections.
- Residential Development Capacity Analysis now compares existing land use with projected land use.

CONTENT UPDATES

- Land Preservation Programs have been included in the Growth Management Policies section discussing proximity to growth areas best planning practices.
- Agricultural Preservation and Sustainable Growth Act of 2012 narrative has been reduced and map removed based on comments from Maryland Department of Planning that the review and adoption of a Tiers map is a separate process from a Comprehensive Plan update.
- Residential Development Capacity Analysis now compares previous Low Density and Medium/High Density with a proposed Low, Medium and High Density in the proposed land use map in urban areas and similar existing land uses with proposed land uses.
- Density changes are proposed for both urban and rural areas and are reflected in the revised tables. The description of land use policy areas has been updated to reflect these density changes in their narratives.
- Preservation Overlay has been removed from the future land use map to simplify the categories in the rural areas

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

MAPS

- 14-5 Sustainable Growth and Preservation Act Tiers Map has been removed.
- Rev 14-5 Future Land Use Map has been updated for symbology to improve readability and align with narrative changes.

TABLES

- Beginning at 14-3 tables have been reordered according to narrative changes.
- 14-7 through 14-10 now compare land use to land use and do not involve zoning references.
- 14-11 Comparison of Existing vs. Proposed Growth Areas table added
- 14-13 Area per Land Use Policy table added

RECOMMENDATION UPDATES

- Recommendation added to analyze and develop a septic tiers map for the County to take advantage of opportunities for additional housing resources.
- Sub recommendations under Update and revise the Zoning and Subdivision Ordinance regulations to incorporate appropriate zoning districts and development standards have been updated to reflect the proposed changes in the narrative.
- Sub recommendation added that where feasible, county design standards should try to align with municipal design standards in areas where annexation is anticipated.

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.

15 - IMPLEMENTATION

PUBLIC COMMENT SUMMARY

The following stakeholders and agencies were involved in commenting on this chapter resulting in updates:

- City of Hagerstown
- Washington County Division of Public Works
- Maryland Department of Planning
- Historic Advisory Committee of Washington County
- Greater Hagerstown Committee
- Antietam Creek Watershed Alliance
- Beaver Creek Watershed Alliance
- Sierra Club of Maryland

There was a total of approximately 14 items for update in the chapter. The majority of comments were in regard to moving the recommendations to shorter terms or confusion regarding the meaning of short/medium/long term.

STRUCTURAL ADJUSTMENTS

None

CONTENT UPDATES

- Additional description of the meaning of short, medium and long term goals was added.
- Medium and Long Term goals associated with housing and water resources were reevaluated against public comments and in some cases terms were updated to short or medium.
- Any new recommendations added throughout the chapters of the plan have been included in implementation chapter.

POLICY REFINEMENTS

None

VISUAL ADDITIONS AND UPDATES

None

RECOMMENDATION UPDATES

None

TECHNICAL CORRECTIONS

- Fixed typographical errors and inconsistencies in formatting from previous draft.