

## Christina Elkins

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**From:** Bonnie Bick <bonniebick@gmail.com>  
**Sent:** Friday, July 28, 2023 4:19 PM  
**To:** Carol DeSoto  
**Subject:** Comment for Bryans Road Sub-area Plan - MDE Clearinghouse Comment Bryans Road was not intended for Bryans Road - mistake  
**Attachments:** Map - WCD county map (1) (4).JPG; airport map with IBA (2).JPG; Rural Legacy Map (2).JPG; MDE Clearinghouse Comment Bryans Road p.1.JPG; MDE Clearinghouse Comment Bryans Road p.2.JPG; airport - surrounded by Priority Preservation Areas\_2021 (6) (2) (5).pdf; Bryans Road - STATE Clearinghouse MDP\_Rev\_Ltr\_Charles\_Co\_Comp\_Plan\_Bryans\_Rd\_Subarea\_Plan (4) (1) (5).pdf; Bryans Road STATE DNR Clearinghouse Comments DNR comments Bryans Road Sub-area Plan (2) (4).pdf; Map - biodiversity Mattawoman-Nanjemoy 2 (9) (2) (1) (3) (3).pdf

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**State Clearing House Comments: MDE Submitted c**

**Mattawoman Watershed Society comments for the record: BR Sub-area comments for a Mining Project not for Bryans Road**

**This BR Sub-area comment is a walkthrough of attachments establishing context for the importance of the MDE Comments for Bryans Road. Charles County is responsible for contacting MDE and getting their proper assessment of the Bryans Road Sub-area Plan, and the impact the proposed plan would have on the MattawomanCreek. MDE has water-quality responsibility for Maryland Bay waters, therefore a responsibility to comment on the proposed removal of the Watershed Conservation District in Bryans Road, including the additional impervious surfaces associated with the airport expansion. The fate of the living Mattawoman Creek is in the balance.**

**Attachment 1: Map- WCD county map - The Watershed Conservation District:** WCD was implemented partly in response to recommendations to conserve the ecological integrity and exploitable resources described in The Case for Protection of the Watershed Resources of Mattawoman Creek ([https://dnr.maryland.gov/fisheries/documents/Mattawoman\\_Ecosystem\\_Final\\_Report\\_March\\_2012.p df](https://dnr.maryland.gov/fisheries/documents/Mattawoman_Ecosystem_Final_Report_March_2012.p df)) that documented the full suite of terrestrial and aquatic resources found in the watershed. (quote from DNR Clearing house Comment on the Bryans Road Sub-area Plan- attached.)

**Attachment 2: Airport - surrounded by Priority Preservation** - Priority Preservation was removed from the airport land to support airport expansion and is being proposed to be removed in Bryans Road Sub-area Plan too. Plus, the Tier Maps would have to be changed too.

**Attachment 3: Rural Legacy Map** - all of the area that is cross hashed is eligible for Rural Legacy, but 16 thousand acres were not included, because they are influenced by the airport expansion. The PC and CC said - oh - we will add it - later. Its eligibility of RL will be lost with the Bryans Road Sub-area Plan.

**Attachment 4& 5: - MDE Clearinghouse Comment Bryans Road Page 1 & 2** The previous MDE administration commented on a different project and accidentally attached the Bryans Road header on the top. Some time ago, it was noticed that there is no mention of Mattawoman Creek or the proposed removal of the WCD. But only now, after a further review, it is clear that MDE did not contribute Clearing House comments on the Bryans Road Sub-area Plan. This Bryans Road plan would be devastating for water quality. At a time when Mattawoman needs additional attention to continue to support the valuable fish nursery and its critical living resources. MDP & DNR both discussed the impacts for

Mattawoman Creek, but no comment from MDE the department that is in charge of protecting the Bay's water quality for Maryland.

**Attachment 6: Bryans Road - Clearing house MDP-** MDP - full, Clearing house Comments, the DNR Comments traveled together with the MDP comments but were kept separate.

MDP: "Since the Bryans Road Development District location in the 2016 Plan Land Use Map significantly differs from the area shown in Map 1 Bryans Road Subarea Plan "Neighborhoods" in the Sub-Area Plan (page 6, Part 2), *Planning recommends that the Sub-Area Plan include a re-evaluation of the water quality impacts (see Section 4.6 of the 2016 Plan WRE) resulting from the implementation of the Sub-Area Plan. This can be completed by assessing the future impervious cover and future forest cover resulting from the implementation of the Sub-Area Plan growth area within the Mattawoman Creek watershed and the Potomac River Middle Tidal watershed and comparing that to the future impervious cover and future forest cover that would result from implementation of the Bryans Road growth area as described in the 2016 Plan within the same watersheds. The differences in future forest cover and impervious cover should be indicated in the Sub-Area Plan and if there is an expected increase in future impervious cover and/or decrease in future forest cover within one or both watersheds, then this issue should be discussed in the Sub-Area Plan and strategies for mitigating the increased water quality impacts from those changes should be outlined in the Sub-Area Plan.*"

**Attachment 7: Bryans Road - STATE - DNR Clearing house Comments:** DNR comments address the serious impacts this plan would have on Mattawoman Creek. DNR- *We viewed the designation of the WCD as the County's application of these recommendations and deemed it a sound conservation approach. The main motivation for creating the WCD was to limit development, indicated by the percentage of the watershed in impervious surface, from passing a 10% threshold for aquatic resources. Sound zoning was applied by the county as a safeguard to prevent development that would increase impervious surfaces to more than 10% of the watershed. The Department recommended that the impervious surface (IS) in the Mattawoman Creek watershed remain below 10% at build-out. Among other ecological benefits, this would avoid further and perhaps irreparable degradation of the watershed's fisheries and fish habitat. The 10% IS recommendation is a natural resource planning guideline threshold based on studies of Chesapeake Bay fish habitat deterioration as development increased across the State, including extensive monitoring of Mattawoman Creek. Ideally, we would recommend 5% IS as a safe target that fully conserves rural watershed functions for fisheries and 2% IS to protect rare, threatened, and endangered species. However, development in Mattawoman Creek's watershed has proceeded past those points and 10% IS becomes a realistic objective for conserving remaining fisheries production and aquatic resources.*

**Attachment 8: Map - biodiversity - Mattawoman - Nanjemoy** just south of the National Capital, - this map shows Mattawoman Creek', Nanjemoy Creek, and Port Tobacco's s great wealth of biodiversity, part of the new Southern National Heritage Area. Special attention to the Mattawoman Creek that supplies clean water to the Malloys Bay - Potomac River National Marine Sanctuary.

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