

March 8, 2024

Charles County Commissioners
200 Baltimore Street
LaPlata, MD 20646

Dear Charles County Commissioners,

I support ZTA 22-173 Independent Living Senior Housing Complex.

As you know, I am the secretary for the Charles County Planning Commission as well as chair of the Bryans Road Business Association. Because of my role in the Bryans Road community as well as the Charles County Planning Commission I consulted with counsel and recused myself from all Planning Commission actions related to the Bryans Road Sub-Area Plan as well as the proposal for an Independent Living Senior Housing Complex on the site owned by The Master's Child Church and Worship Center in Indian Head Maryland.

I am submitting these comments as a citizen and as an over 25 year resident of Bryans Road, Maryland.

Listed below are my reasons for supporting the proposal:

1. The 2016 Comprehensive Plan, like all similar plans, is a document that includes aspirational goals for urban planning categories such land use, economic development, environmental protections and inclusive housing. Like all aspirational plans, implementation requires informed discussion, analysis, public participation and inevitable trade offs that balance a combination of sometimes conflicting factors while seeking to address the public good. Holding out for perfect solutions in any one category is unrealistic and leads to stalemate and stagnation.
2. I believe it would be a beneficial use of time for anyone considering this proposal to review the record on the implementation of the Watershed Conservation District zoning. Although it is part of the current zoning, its implementation has been problematic. The deliberations were divisive, politically charged and bitter.

The record contains comments from Charles County Commissioners that appropriate analysis had not been undertaken by the county to consider options that could have been less impactful on personal land values. The County Commissioners departed from the recommendations of the Planning Commission by increasing the number of acres per residential unit from 1 to 10 to 1 to 20. This action significantly impacted property

values within its boundaries. The negative impacts on land values were primarily to African-American landowners.

Briefings by the consultant who prepared the Bryans Road SubArea Plan approved on October 24, 2023 confirm that implementation of the WCD was an overreach and while “heartily supported by environmental activists, many property owners and organizations representing the African American community opposed the changes as they devalued properties and made intergenerational wealth transfer more difficult.”¹ I believe the county should be concerned that a potential Environmental Justice associated with the WCD has been festering.

3. The plan approved on October 24, 2023 recommends “that a senior living community be permitted on approximately 20 acres of property owned by St. Mary’s Star of the Sea.”
4. The county has commissioned one study after another that confirms the need for affordable housing. According to the report titled *Community Planning Assistance Teams, Charles County Housing Initiative Project: Inclusion, Affordability, and Diversity, Charles County, Maryland Final Report, May 2018*, “in order to meet the residual demand, Charles County will need 1,823 additional affordable housing units by the years 2025, or 228 units per year for each of the next eight years.”² The county has made little to no progress towards meeting this need. The same study states, “Many older adults live alone, which drives demand for in-home supportive services and independent and assisted living facilities.”³ There is a currently long waiting list for senior housing in the county.

One process improvement I believe the county should consider is to review the feasibility and applicability of performing impacts and mitigations analysis similar to the analysis required on federal projects by the National Environmental Policy Act (NEPA). This type of analysis could help to facilitate discussions that leave all stakeholders more comprehensively and uniformly informed as decisions are made by the county commissioners.

In the meantime, I believe the proposed project should proceed and that discussion should include the adequate public facilities requirements the church will need to undertake to implement the project.

¹ Bryans Road SubArea Plan, RECOMMENDED FOR BOARD OF COUNTY COMMISSIONERS ADOPTION FEBRUARY 27, 2023, p. 7
https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/2241527/Bryans_Road_Sub_Area_Plan_PC_recommended_2-27-23.pdf

² Community Planning Assistance Teams, Charles County Housing Initiative Project: Inclusion, Affordability, and Diversity, Charles County, Maryland Final Report, May 2018, p. 17
https://planning-org-uploaded-media.s3.amazonaws.com/publication/download_pdf/CPAT-Charles-County-Maryland-final-report.pdf

³Community Planning Assistance Teams, Charles County Housing Initiative Project: Inclusion, Affordability, and Diversity, Charles County, Maryland Final Report, May 2018 ,p. 13

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dawud Abdur-Rahman', with a long horizontal flourish extending to the right.

Dawud Abdur-Rahman
2304 South Hampton Drive
Bryans Road, MD 20616
240-682-2657