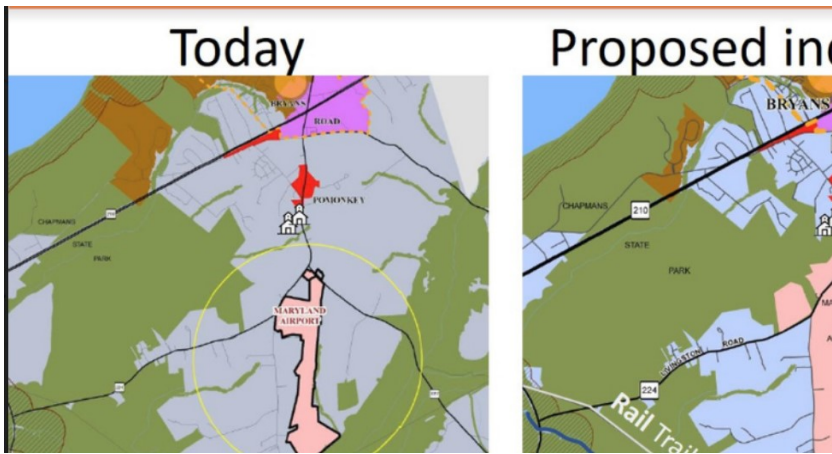


Carol DeSoto

From: Alex Winter <alexbillwinter@gmail.com>
Sent: Thursday, September 30, 2021 4:59 PM
To: Carol DeSoto
Subject: Comments for record of Sept. 22 hearing re: Amendment to 2016 Comp Plan-Airport.
Attachments: airport - biological hotspot with outline DNR (1) (1) (1) (1).JPG; Maryland Airport Land Use Study draft 4-15-15, PC Work Session of 9-14-15 (1) (1) (1).pdf; airport - ecological assets maps (1) (1) (2).pdf; EPA 2014 comments Maryland Airport SEA CC 10 30 14 (3) (1) (2).pdf

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Airport NEPA timeline (work in progress):

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Approximate timeline:

2001 FAA EA - A public hearing was held - no one attended, not even an adjoining property owner. We were unaware of it, even though we were intensely publicly involved in NEPA

issues in the area.  [2002 Airport EA pg 1-281 OCR after some mark-up..](#)

2003 the FAA issued a Finding of No Significant Impact (FONSI) for the realignment and expansion of the runway and associated taxiway and hangar development at the Maryland Airport. In 2021 Charles County planning staff used this document to convince and assure the Charles County Planning Commission that the federal FONSI shows there are no serious problems with the proposed work.

The FAA issued a 20 million dollar grant to the airport owner.

2012, an interagency task force released a report warning Mattawoman was on the tipping point, recommending measures like limiting new impervious surfaces.

Power Point: https://dnr.maryland.gov/fisheries/Documents/tredmanAlliance_Presentation.pdf

Inter-agency Task Force Report:

https://dnr.maryland.gov/fisheries/Documents/Mattawoman_Ecosystem_Final_Report_March_2012.pdf

The report stressed the importance of protecting Mattawoman and the threat to its health posed by the conversion of forest into impervious surfaces. It expressed serious concerns about the future health of the Mattawoman and recommended applying the brakes to the conversion to impervious surfaces. The Executive Summary early in the document is strong.

"The Mattawoman Creek Watershed has been the focus of inquiry, study, and concern by a range of state and federal resource agencies. Mattawoman Creek and tributaries are clearly among the State's highest conservation priorities for estuarine systems."

2013 - the runway was realigned and extended to 3,743 feet. (10 years after the FONSI). The construction of the new runway in 2013 required a tributary of the Mattawoman Creek to be routed through a drainage culvert under the midpoint of the runway -- see the federal agencies comments in FAA EA on their evaluation of "significant impacts."

2014 FAA - Supplemental Environmental Assessment. There was never a FONSI for this. The last action on the supplemental EA was the attached letter from the EPA (attached).



Supplemental EA dated Feb 2015 All scans Reduce...

In 2014 the county hired a consultant to study the economic ROI of the county taxpayer investment for the airport expansion. This report did not support the airport advocates' claims that the airport would be economically beneficial to the public. "In terms of driving businesses, it would be a tool used to recruit rather than something to draw people in." The study did not recommend county taxpayer investment for infrastructure.

In 2017, in response to the 2012 interagency task force report cited above, the Charles County Commissioners enacted, as part of the 2016 Comprehensive Plan, the Watershed Conservation District, limiting the conversion of pervious surface to impervious surface in identified areas.

In 2020 the County began hearings on an Amendment to the Comprehensive Plan that would remove the Watershed Conservation District, the area around the airport. This WCD removal opens the land for industrial.

Immediately after the Planning Commission hearing, the staff promised that all of the questions raised by the community and the Planning Commission members would be answered. But their only answer to date is a stale FONSI that EPA has criticized for making assertions without a factual basis.

There follows a quote from Charles County staff at the Planning Commission work session where, after this presentation by the staff, there was a Planning Commission vote (4-3) to proceed with the project, to recommend that the County Commissioners approve the Amendment to the 2016 Comprehensive Plan – MD Airport expansion project.

soft quote from the staff: "For the start - regarding health impacts and environmental assessment questions regarding the impacts from air and noise pollution from the airport on nearby schools and residents. A federal Environmental Assessment Study was conducted before the airport began its expansion. There is a table to determine the potential environmental impacts from that project and the environmental assessments do include analysis of the impact on environmental resources as well as noise and air quality impacts. The end conclusion of that assessment is a FONSI - a Finding of No Significant Impact was issued."

FAA 2003 FONSI [MD Airport FONSI.pdf \(456 KB\)](#)

The county and the airport owner claim they have FAA permission now, to extend the runway to 4,300 feet and contend that the further expansion was already approved, in 2003. At the PC hearing, the county stated that the airport owner is applying for an additional FAA Grant to fund that further runway expansion.

Federal involvement is established by the county's action of using the stale federal 2003 FONSI to get local Planning Commission approval. It is EPA's regulatory responsibility to act .

The destruction includes:

Increased exposure of schoolchildren to lead pollution.

Eviscerating a local government action (WCD) taken in response to a serious warning from an interagency task force.

Severely increased flooding in an area already in flood trouble.

Destruction of Important Bird Habitat.

Fragmentation of forest, the fragmentation that is now prevented by the WCD.

Fragmentation of a natural Wildlife Corridor that connects Mattawoman and Nanjemoy Important Bird Areas

And of course, much more.

Also included as an attachment: List of Ecological values and maps showing the area around the airport that the Charles County Commissioners are in the process of removing the environmental protection of WCD which allows 8 % impervious to industrial zoning that allows the maximum level of impervious surface 70 - 80 % with special stormwater considerations.