



September 22, 2021

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The Board of Charles County Commissioners
200 Baltimore Street
La Plata, MD 20646

Re: Amendment to the 2016 Comprehensive Plan Maryland Airport

AMP Creeks Council
Kelly Canavan, *President*

Audubon Maryland-DC
Important Bird Area Program
David Curson, PhD., *Director of
Bird Conservation*

Chapman Forest Foundation
Bonnie Bick, *President*

Conservancy for Charles County
Hal Delaplane, *President*

Maryland Bass Nation
Scott Sewell, *Conservation
Director*

Maryland Conservation Council
Paulette Hammond, *President*

Maryland Ornithological Society
Kurt Schwarz, *Conservation Chair*

Mattawoman Watershed Society
Alex Winter, *President*

Smart Growth Maryland
Elly Cowan, *Director of Advocacy*

Dear Charles County Commissioners:

The Smarter Growth Alliance for Charles County, a coalition of more than 20 local, regional, and state organizations representing approximately 5,000 supporters in Charles County, appreciates the opportunity to comment on the proposed changes to the 2016 Comprehensive Plan Amendment: Maryland Airport Expansion. The Alliance has long-standing interests in land use issues that could be profoundly affected by development within the Maryland Airport surrounding area and as such, ***we cannot support*** the proposal. The amendment to the 2016 Comprehensive Plan as adopted would not only negatively impact the environment but also the quality of life of the community. Moreover, the proposed amendment's lack of consistency in context undermines the Goals and Objectives of the Plan. The Smarter Growth Alliance for Charles County has already voiced the same objections to the amendment before it was submitted to the State Clearinghouse for comment at the end of 2020. Accordingly, after careful review of the proposed changes as well as comments from various state agencies we continue to be opposed.

WCD to EID

The 2016 Comprehensive Plan made several changes to the Land Use Map including revising the previously designated Employment & Industrial Park District (EID) around the Maryland Airport to Watershed Conservation District (WCD) to protect water quality and the Mattawoman Creek. Providing additional protection to the Mattawoman is a legitimate public interest and promotes resource conservation. Indeed, when the 2016 Comprehensive Plan was developed, it was shown that the health of Mattawoman Creek was threatened and at a tipping point. The Plan called for the creation of the Watershed Conservation District in part to protect the Mattawoman Stream Valley and Creek. The WCD includes special site design regulations that set limits to impervious surface coverage that would protect the natural resources in this zone. Additionally, limiting impervious surface coverage in the vicinity of the airport is essential to preventing an irreversible decline in the health of Mattawoman Creek.

Changing the zoning of the subject parcels will remove those protections for 558 acres of land. Removing limits or increasing the amount of impervious surface coverage on these properties is inconsistent with two of the twelve visions for planning that call for environmental protection and resource conservation. Protecting the Mattawoman Creek from incompatible development is critically important to maintain the health of the creek. In its comments on the comprehensive plan amendment, the Maryland Department of Planning notes:

Much of the land area proposed for the change in land use is identified by the Maryland Department of Natural Resources (DNR) as a Targeted Ecological Area, defined as “lands and watersheds of high ecological value that have been identified as conservation priorities.” Portions of the area are also within protected easements. Further, it appears that the property is also located within the county’s Priority Preservation Area (PPA), which preserves agricultural lands. Therefore, the proposed plan amendments may have a significant impact on Charles County’s resource conservation/water quality protection efforts.¹

For over 70 years, the privately-owned Maryland Airport has occupied a plateau severely constrained between the Mattawoman stream valley and Bryans Road. Now, after the filling of a stream valley with “devastating impacts” [NMFS, 2001], the lengthened runway has prompted development interests to seek zoning changes that will require county-provided infrastructure for greenfield development in a large, forested area around the airport. From the MDP Comments:

There is no question that the expanded EID land use would require increased amounts of impervious surface for a larger runway, new taxiways, larger hangers and aprons, parking, industrial park roofs and parking lots, roads, etc. In addition to generating more stormwater runoff, airports require chemicals for clearing runways, de-icing and servicing planes, firefighting, etc., not to mention increased road salting for the complementary development.²

The longer runway and proposed airport expansion would mean an increased air traffic which could have negative impacts on the community's health and quality of life due to increased noise, carbon monoxide, and other toxic exhaust components. Even those who do not live very close to the airport surroundings must seriously consider the increased risk of asthma, cancer, respiratory and heart problems from the carbon monoxide and other toxic exhaust components because of polluted air circulation. These life-threatening conditions would disproportionately affect young children and the elderly in our community. To make matters worse, JC Parks Elementary School and Matthew Henson Middle School are located less than half a mile away from the airport and often experience airplane flyovers. Multiple nursing homes are also located close by, within a 15-mile radius of the airport. Consideration of the fate of these communities is a responsibility that our county decision makers must take seriously.

¹ Maryland Department of Planning, *Draft Amendment Charles County Comprehensive Plan: Maryland Department of Planning Comments*, pp 2, (2021).

² Ibid.

Protecting an Established Economic Driver

Besides the environmental benefits of protecting Mattawoman Creek, protecting an established economic driver is also economically beneficial to Charles County. Outdoor recreation is a proven economic driver throughout Maryland. According to the Outdoor Industry Association, outdoor recreation in Maryland annually accounts for \$14 billion in consumer spending, supports 109,000 jobs, generates \$4.4 billion in wages, and produces nearly \$951 million in state and local tax revenue. The Mattawoman watershed contains a nationally renowned fish habitat, and the recreational bass fishing industry in the Potomac alone is an outdoor tourism attraction that contributes to Charles County's economy. Unfortunately, that same fish habitat is threatened by loss of forest and stormwater pollution, which the proposed rezoning would help pave the area. Additionally, Mattawoman Creek provides critical habitat, wetlands, and good water quality for the Potomac River and the new Mallow's Bay-Potomac River National Marine Sanctuary. Charles County Government was the recipient of the National Association of Counties (NACo) Achievement Awards for the Mallow's Bay- Potomac River National Marine Sanctuary. The County has the opportunity to harness the long-term economic opportunities from visitorship of the Marine Sanctuary by investing in not only visitor centers and other tourism resources but also in the health of the environmental assets themselves. Even with the delayed start to the paddling season this year, visitor use increased by 20% in 2020 compared to 2019. As the County looks towards economic recovery from the COVID-19 crisis, it needs to be supporting the conservation of outdoor destinations that are part of the lucrative outdoor tourism industry.

Any discussion about the potential economic value that would accrue from developing the properties surrounding the airport must include the value of the ecosystem services provided annually by those parcels. The 2017 DNR report prepared for the County recognizes the tremendous benefits to society provided by our natural resources. Additionally, DNR created a parcel evaluation tool that gives decision makers the ability to make custom calculations and measure the economic impact of ecosystem service loss and/or preservation. Using this tool to evaluate six of the identified properties that are the subject of this amendment shows that combined, these parcels generate a total ecosystem service economic value of over \$700,000 annually. Developing these properties will not only remove the ecosystem services and economic value, but the County will need to expend funds to compensate for that loss. These findings show that the county can have economic development and protect the environment without sacrificing either of them.

³ Maryland Department of Planning, *Draft Amendment Charles County Comprehensive Plan: Maryland Department of Planning Comments*, pp 11, (2021).

⁴ *Ibid.*

Economic Development and Environmental Protections are not Mutually Exclusive

The Maryland Department of Planning agency commenting on the proposed amendment noted that Charles County can have economic development growth without sacrificing its environment and historical sites in the process. The agency stated that this “Planning suggests that the county, when pursuing such zoning changes, evaluate and consider how they may impact objectives to preserve the natural resources of the area, and how any new zoning changes may be designed to mitigate an increase in pollutant loads to the county’s waterways. It should be noted there are various zoning techniques that could be used to enable airport and complementary nonresidential adjacent uses to be permitted by right, while also providing environmental protection to the Mattawoman watershed.”³ In other words, the county must consider alternatives to achieve economic development while protecting its existing natural and historic assets. In response to previous criticism from the state, the county created an innovative zoning tool in adopting the WCD in its 2016 Comprehensive Plan for which it justly deserves praise.

The proposed amendment does not align with that goal and will negatively impact on the lucrative cultural and outdoor tourism industries in Charles County. The vague promises of potential economic development from rezoning pale in comparison to the very real economic benefits that already come from the Mattawoman watershed. As the County looks towards economic recovery and advancement in the wake of the COVID-19 crisis, it should be investing in *existing and proven* economic drivers. Therefore, we urge you to oppose the proposed Amendment to the 2016 Comprehensive Plan before you, especially for potential problems they pose on the surrounding environment, the cultural and outdoor tourism assets, and the future of the economy of Charles County.

Thank you again for your consideration

⁵ Maryland Department of Planning Comments, pp 7.