

Smarter Growth Alliance for Charles County

P O Box K
Bryans Road, MD 20616

February 4, 2015

via email: BallSt@charlescountymd.gov

Steven Ball, Director
Charles County Dept. of Planning and Growth Management
200 Baltimore Street
La Plata, MD 20464

Re: Maryland Airport Land Use Study

Dear Mr. Ball:

Thank you for considering these comments on the Maryland Airport land use study from the Smarter Growth Alliance for Charles County (SGACC), a coalition of more than 20 local, regional and state organizations representing approximately 5,000 supporters in Charles County. We advocate programs and policies that support economic development while preserving the county's rural heritage and promoting a healthy outdoors.

The objectives of the land use study (LUS) appear in somewhat different forms in the draft Comprehensive Plan, the Request for Proposals¹ for the study, the letter to stakeholders and the open-house presentation,² which was attended by many representatives of SGACC organizations. Appended are the objectives as they appear in the RFP; we couch our remarks around these.

Given that this is a land use study, it is perhaps not surprising that the principles of smarter growth are responsive to many of the objectives and should deeply inform the study. In fact, we see that land use choices around the airport reflect a number of the concerns for the draft Comprehensive Plan that we have attempted to communicate to the Planning Commission. Chief among these concerns is conservation of the remarkable natural and historic assets in the western county. Protecting these assets is a requisite for sustainable nature and heritage tourism³ and for revitalizing Indian Head as a trail destination town.⁴ Such a vision would also better protect against encroachment of the Naval Support Facility, the county's largest employer outside the

¹ Airport Land Use Study, RFP 14-28, December 3, 2013.

www.charlescounty.org/webdocs/fs/bidboard/Solicitation293/131203%20-%20RFP%2014-28%20-%20Airport%20Land%20Use%20Study%20-%20Final.pdf

² www.charlescountymd.gov/sites/default/files/pgm/planning/mdair_pres1-14-15reduced.pdf

³ *Nature and Experiential Tourism: Report and Recommendations for Charles County, MD*, Fermata, Inc., Austin TX, October 20, 2000. www.fs.fed.us/recreation/programs/tourism/charles_county.pdf

⁴ *Technical Assistance Panel Report, Indian Head Rail Trail*, Urban Land Institute, Bethesda, MD. (May, 2012) <http://washington.uli.org/wp-content/uploads/sites/56/2011/06/Indian-Head-Final-Report-Draft.pdf>

Board of Education, and would not tempt investment away from Indian Head or the Waldorf Urban Redevelopment Corridor.

We emphasize that four of the six objectives in the study would be simultaneously addressed if the LUS recommended enhanced conservation measures around the airport. Conservation would minimize the public's exposure to risk and noise (Objective A); would prevent encroachment of incompatible uses (Objective C); would much better protect sensitive and declining Mattawoman Creek (Objective D); and would protect the public against the financial risk incurred by providing infrastructure to an area that is uncompetitive with employment centers already having infrastructure⁵ (Objective E).

Objective E seeks to economically rationalize expenditures for sewer lines to the area, including the Indian Head Science and Technology Park (tech park). We urge the LUS to reveal the full costs to the public, not only for sewer lines, but also for additional likely costs such as road widening and mitigation for increased traffic that may eventually occur outside the study area.

For the cost for sewer lines, we refer you to comments by one our members, the Mattawoman Watershed Society (MWS). Based on county estimates, sewer lines to the tech park—included in Objective E—would cost \$8 million, excluding future maintenance.

Concerning airport revenues, we refer you again to an analysis by MWS that finds current revenues around \$1.5 million. A misleading amount of \$9 million, based on the construction phase of the runway, has been advertised by speakers at the open house⁶ and a pamphlet distributed by the airport owner.

While public costs have yet to be tabulated, financial risk is strongly implied by the tech park market study and the preliminary conclusions presented at the January 14 open house. The tech park study concluded that residential development was the most likely avenue for the county to recoup costs, a recommendation clearly incompatible with the airport.

With respect to avoiding incompatible uses and public safety (Objectives A and B), Bryans Road is a concern. The present sub-area plan for a new urban center was extremely unpopular when passed by the Board of County Commissioners and remains so. It encourages dense development with little setback on Route 210, causing concern for the Navy, which transports energetic materials to its facility in Indian Head.⁷ The sub-area plan has a central core zoned for 8000 housing units. The new runway alignment places the northern flight-path directly over this urban core. Planning Bryans Road for a mixed-use village, as advanced in the “merged” comprehensive plan scenario, would alleviate the risk imposed by this incompatibility.

⁵ *Indian Head Science & Technology Park Market Analysis and Due Diligence Services*, prepared by JLL for Charles Count Dept. of Economic Development (October 2, 2014).

[www.boarddocs.com/md/chrlsco/Board.nsf/files/9QTUSD4E36B0/\\$file/IHTP%20Report%20FINAL.pdf](http://www.boarddocs.com/md/chrlsco/Board.nsf/files/9QTUSD4E36B0/$file/IHTP%20Report%20FINAL.pdf)

⁶ *Green, business groups face off over airport study*, Maryland Independent, Rebecca Barnabi January 16, 2015

⁷ Minutes of the Policy Committee, Indian Head Joint Land Use Study, for 26 September, 2014.

http://www.indianheadjlus.com/documents/09262014_IHJLUS_PC%20MeetingMinutes_FINAL.docx

Besides the urban core, the sub-area plan also promotes widespread residential development in the area. An example is the 438-unit Guilford subdivision plan, which curiously is excluded from the LUS study area. Not only is it incompatible with a nearby airport, its density became obsolete when permits for the Cross County Connector were denied by the Army Corps as being “contrary to the public interest.”

The quality of schools remains a concern for our member organizations. Both Matthew Henson Middle School and J.C. Parks Elementary School fall *inside* and nearly beneath the standard FAA flight pattern⁸ for northerly winds. We note that J.C Parks employs outdoor-classroom techniques in their environmental units. We encourage the LUS to seek means for reducing safety risk and noise exposure to the students of these schools.

The accumulation of overlapping environmental qualities in the study-area are superlative. We refer you to materials already provided by stakeholder groups in our alliance, their subsequent comments and research by ERM. We emphasize here that Mattawoman Creek is under duress from the cumulative adverse impacts of urbanization, including the airport expansion itself,⁸ and these effects should be strongly considered in the LUS. We also note that the open-house presentation neglected to acknowledge the predominance of an Audubon Important Bird Area and the quality of the Pomonkey School Stream beyond its Wetland of Special State Concern. This stream and the land around it could serve as outdoor education asset for the nearby schools. The amount of Targeted Ecological Area was also under-represented with obsolete maps.

Despite high ecological value, over 1000 acres in the study-area are zoned for PEP, BP and IG. The RFP also encourages⁹ examination of “other areas that could support additional commercial development...” When coupled with the economic risk revealed by the market studies and the presence of employment land in the county sufficient beyond the 2040 horizon of the draft comprehensive plan, the ecological features argue for stronger conservation measures.

We have reservations that Objectives C and F both seem to assume, *a priori*, a LUS outcome that recommends new development. The isolated business park is an outdated planning concept, and businesses seldom relate to aviation when such parks are located near a general aviation airport. Hence aviation-compatible development (Objective C) could be realized with a quite small footprint, likely “within the fence” as indicated in the market analysis by RKG Associates.² The development of a “marketing a strategy to promote commercial development and employment opportunities in the surrounding area” (Objective F) appears to be entirely inconsistent with the tech park market study and the findings of RKG Associates’ market analysis. It is also inconsistent with the precepts of smart growth, given Charles County’s configuration where infrastructure and employment centers are concentrated along the U.S. 301 corridor. This situation will only be amplified by the Nice Bridge replacement. Moreover, modern planning emphasizes redevelopment for its efficiency and resource conservation. Schemes to develop greenfields in the western county can only detract from the need to redevelop Indian Head.

⁸ Environmental Assessment for Maryland Airport.

⁹ RFP, *op. cit.*, p. III-1

In summary, we believe that the historical location of the airport in an ecologically sensitive area, sandwiched between Mattawoman Creek stream-valleys and Bryans Road, presents overwhelming obstacles to leveraging it for greenfield development. Consideration of the land use study objectives underscores this: residential development is incompatible with an airport, and new commercial development on greenfields is not only inefficient and outdated, but unmarketable in the area. We believe an objective analysis would have little problem recommending increased conservation of the area through zoning, easements and purchase.

Sincerely,

Kimberly Brandt
Local Policy Director, 1000 Friends of
Maryland

Karla Raettig
Executive Director, Maryland League of
Conservation Voters

Kelly Canavan
President, AMP Creeks Council

Kurt R. Schwarz
Conservation Chair, Maryland Ornithological
Society

David Curson
Director of Bird Conservation, Audubon
Maryland-DC

Marney Bruce
President, Maryland Native Plant Society

Bonnie Bick
President, Chapman Forest Foundation

Ken Hastings
Board Member, Mason Springs Conservancy

Julie Simpson
President, Citizens for a Better Charles
County

Jim Long
President, Mattawoman Watershed Society

Andrew Galli
Maryland Program Manager, Clean Water
Action

Deanna Wheeler
President, Nanjemoy-Potomac Environmental
Coalition

Cheryl Cort
Policy Director, Coalition for Smarter
Growth

Jerry Forbes
President, Port Tobacco River Conservancy

Hal Delaplane
President, Conservancy for Charles County

Claudia Friedetzky
Chapter Conservation Representative, Sierra Club,
Maryland Chapter

Scott Sewell
Conservation Director, Maryland Bass Nation

David Kanter
Chair, Sierra Club, Southern Maryland Group

Paulette Hammond
President, Maryland Conservation Council

Ulysee Davis
President, South Hampton HOA

Bob Lukinic, Conservation Chair
Southern Maryland Audubon Society

cc: Charles County Board of Commissioners

List of objectives as they appear in the Request for Proposals¹ for the Land use Study.

- A. Protect public health, safety, and welfare through the adoption of land use standards that minimize the public's exposure to safety hazards and excessive noise from the airport.
- B. Prevent the encroachment of incompatible land uses around the airport in order to preserve the future utility of the airport.
- C. Ensure the growth of aviation compatible economic development activity within the areas surrounding the airport.
- D. Assessment of future growth and development with respect to environmental conditions related to the Mattawoman Creek Watershed.
- E. Explore the potential for return on investment to extend sewer lines to the area, including the Indian Head Science and Technology Park.
- F. Develop a marketing strategy to promote the airport as well as potential commercial development and employment opportunities in the surrounding area.