

January 18, 2023

To Centreville Town Council

From: Corsica River Conservancy; Frank DiGialleonardo, President

Subject: Draft Comprehensive Plan Update

The Corsica River Conservancy (CRC) appreciates the opportunity to comment on the draft update to Centreville's comprehensive plan. CRC works to restore and preserve the Corsica River and its surrounding lands through direct action, partnerships, and building enhanced environmental awareness among its more than 500 members in the Town and surrounding community. We believe that developing a balanced and sustainable comprehensive plan at this time is particularly important given that significant residential developments have been proposed, major commercial developments are under discussion, and costly investments in critical infrastructure, including wastewater treatment, are needed. We are impressed with the draft plan update and commend the efforts of those who have developed it thus far. We trust it will be further improved as a result of public review and it is in that spirit that we offer the following comments and recommendations.

The Plan rightly recognizes that the natural environment and water resources are an integral part of land use, housing, transportation, and community facilities. However, our overarching comment is that the laudable natural resource goals and objectives expressed in Chapters 4 (Natural Resources) and 5 (Water Resources) and the connections with the other topics are not supported by the plans and assumptions about development and growth. In Chapter 3, Municipal Growth, the Town selects a future growth target upon which all other recommendations are premised. The selected projection is based on a consideration of past growth. It does not directly take into account the negative consequences of that rate of growth on resources that other parts of the plan presume to protect. It would be better to develop a growth target that is derived from a commitment to maintain quality of life and protection of natural resources while supporting smart growth. The plan would have a major gap if it did not rationalize its growth intentions against its natural resource conservation goals and stewardship commitment.

One way to help assess the effect of growth on the watershed is to look more closely at increases to the percent of impervious surface. (Section V, p. 40-14). The amount of impervious surface in a given watershed is a major factor of watershed health. With the current 5 percent coverage in the Corsica watershed (6 to 7 percent in non-tidal streams) as determined by Maryland's Department of Natural Resources, deterioration of fish habitat is already occurring. The plan seems to assume that impervious surface cover can climb to 10 percent without major negative effects. In fact, 10 percent has been shown to be a threshold to irreparable harm to habitat. DNR's research studies of this effect are supported by studies done around the country and around the world.

Rationalize Planned Growth With Natural Resource Goals and Stewardship Commitments

We believe the Town should explicitly confront and resolve the plan's key contradiction before

finalization. This can be done in several ways. For example, in order to accommodate significant growth increase, the Town could commit to extraordinary measures of stormwater control. It is relevant to note that examples of such techniques were included in the developer's plans for Carter Farm. With regard to the Critical Area, we observe that the Town has a lot of existing development commercial and other, in LDA and IDA. Many of these properties likely were developed before modern stormwater techniques were available. It could be useful to review these areas with an eye towards retrofits that would improve buffering or otherwise reduce stormwater runoff in these especially sensitive areas. Again, this could help offset necessary development in other areas. Another option would be to commit to prioritize infill over new development whenever that choice is available.

The most encompassing option would be to reduce the planned growth target. The draft plan seems particularly passive in this regard basing its planned growth on recent trends and expectations rather than on intent and desires. While external growth pressures are undeniable, the Town is certainly in position to make key decisions on wastewater treatment, water supply, annexations and others that will either permit or constrain future growth. The right decisions could allow a future in which natural resources will be sustainable. The wrong decisions will foreclose that future and embark on a non-recoverable deterioration of its surrounding natural resources and quality of life that has so defined the character of Centreville. This should and can be a conscious decision rather than *fete accompli*.

Recognize That Natural Resources Can Provide Economic Benefits

The plan would also do well to better recognize the economic value of natural resources. Ecosystem services are those direct and indirect contributions that ecosystems make to human well being. Natural resources regulate flooding and climate damage, provide nature-based recreation and jobs, enhance pollination, provide public health benefits, lower utility needs and allow less costly operations of government departments. Explicitly recognizing the economic value of these and others contributions would help balance the cost and benefit analysis that takes place as development decisions are made. Although the transportation chapter advocates walking trails and bike paths, it does not mention the value of lower car use, lower energy costs, and less air pollution that comes from dense development. The alternative of sprawl raises these costs.

Include Water Supply in the Source Water Protection Plan

Preserving our precious Aquia aquifer is critical to all of us living in the watershed and surrounding areas. We heartily support the Town's efforts towards a Source Water Protection Plan and urge that its scope address adequacy of supply in addition to the threat of contaminants. Climate change is teaching us that we cannot rely on historic weather patterns in preparing for the future. Our area has been generally blessed with adequate rainfall to regenerate the aquifer in recent years. However, even local drought conditions in the last 20 years have resulted in area wells running dry and the need to replace them with deeper ones. Since then, demand from residential, commercial and agricultural uses has increased

dramatically. The draft plan refers to a new 600,000 gallon facility on the northeast side of town. The Town needs to work together with the County and State to assure the integrity of the Aquia for the future.

Other Comments

The housing section recognizes and attempts to reconcile housing-focused recommendations with zoning and land use framework, which represents the Plan's appropriate effort to show the interrelationships of issues in the plan. We would like to see the citizens committee include the environmental impact of its decisions within its charter.

The transportation section recommendations should include a requirement that new or improved trails, bikeways, and roads include effective stormwater best practices. Tree plantings should include funding for maintenance and preference should be given to native trees that will thrive under anticipated future climate conditions. Roads should not be permitted to go through sensitive ecological areas.

The community facilities section appropriately highlights water and wastewater treatment constraints. Natural resource areas are folded into discussion of parks, of which they are an important component but have a much wider importance. An objective called out is to "ensure that developers contribute to providing and enhancing community facilities and essential public services at least commensurate with the expected impact of their proposed projects." Natural resources, which also have economic benefits and can reduce Town costs if appropriately managed, should also be considered as an essential public service that developers should be expected to support.

Implementation

Implementation is key to the successful outcome of any plan. The pressure for development is driven by financial incentives and short term economic benefits to developers. The pressure against development is brought by residents and others who do not have a financial interest in the outcome while benefits are often gathered over generations. Although the plan does not have regulatory or legal penalties, the town can enact policies that even out this imbalance. One important tool used to manage growth is an Adequate Public Facilities Ordinance. Public facilities are often envisioned to be schools, roads, and waste and water provision. But the environment is a public good and can also be covered by the APFO approach, that is, the environment should be treated as a finite resource and one that needs to be sufficient to support any expanded pressure put on it. We would encourage the town to look at whether the requirements put on developers actually reflect the accurate, comprehensive, and temporal appropriate costs. A standing forest is not replaced by planting a few new trees.

..