



FRIENDS of FREDERICK COUNTY

preserving our land, our water and our quality of life

July 15, 2009

Audrey Wolfe, Chair
Catherine Forrence, Vice Chair
Joseph F Brown III
Robert L. White Jr, Secretary
Richard Floyd
John B McClurkin
Kai J Hagen, BOCC Liaison

Dear Frederick County Planning Commissioners:

We applaud your efforts and those of the Frederick County Planning Division on this 20 year Comprehensive Plan for our county, and your diligence at incorporating citizen views and concerns to preserve our quality of life. Namely, taking smart growth steps to promote infill and redevelopment within areas that already have infrastructure and have seen urbanization, promoting farmland preservation, the viability and vitality of agriculture, watershed protection and incorporating intelligent transportation ideas into this new comprehensive plan.

We would like to make some observations and express some concerns that we think might help maximize the county's achievements at reaching its goals and objectives.

Chapter Three provides a description, but not a plan. Frederick County is known for its bucolic scenery, streams and rivers, mountains, forests, wetlands and river valleys. Chapter Three does a nice job of describing these elements along with the rare and endangered species in the county. Yet Chapter Three doesn't do what it should do and what the Maryland Department of Natural Resources has been working to do around the state, and that is describe the economic, social and community benefits of our natural resources and sensitive areas and how these benefits relate to future county growth. We ask, for example, that we estimate for this plan:

- the economic benefits of forests and wetlands in Frederick County for their carbon sequestration potential
- the social and economic benefits of forested urban areas for temperature control
- the environmental benefit of temperature reduction of storm water runoff through forested urban areas to fisheries
- the economic benefit of wetlands for flood control
- the socio-cultural benefit of wetlands for environmental education (and their facility to host faunal species of interest to children)
- the economic benefit of wetlands for water purification

When humans pollute or deplete resources on which biological services are based, species and their ecosystems are jeopardized, something that might cost us more in the long term in restoration and clean up. We suggest that Frederick County assess the economic and environmental benefits of green infrastructure; such an assessment can serve as a foundation to develop strategies and policies to preserve biological diversity and maintain ecosystem integrity.

Small streams lack necessary protection. At a time when there is concern of irreparable damage to the Chesapeake Bay why do we in Frederick County eliminate the Natural Resource designation from small tributaries? No need to state that its the small streams that create the larger streams, rivers and eventually our Chesapeake Bay. All riverine habitat along this trek is critical to the watershed's integrity. The Plan seeks to protect natural resources and environmentally sensitive areas (Goal #1). In response we urge the Planning Commission to meet the goal designated in the Comprehensive Plan by designating small streams as Natural Resources. As a first step towards protecting natural resources we should identify and depict these sensitive features on the Comprehensive Plan Map.

Green Valley "rural residential" designation promotes sprawl. There are many large parcels located in the Urbana Region to the east and some to the west of Route 75 /Green Valley road that are designated as "rural residential" on the comprehensive plan map. Rural Residential designation promotes large-lot R-1 sprawl development and perpetuates outmoded land development patterns that originated in the 1950s. These developments rely on individual well and septic systems which pose serious risks for water resources. Because it is remotely located and dispersed, sprawl development increases the costs of transporting children to school, isolates residents from commercial amenities and aggravates traffic congestion by increasing reliance on the car. This Rural Residential land use designation contradicts Water Resources Policy No 4 that seeks to "minimize new development utilizing individual well and septic systems". The Plan also prohibits the expansion of "designated Rural Residential areas into the surrounding Agricultural/Rural or Natural Resource designated areas". [MG Policy No. 4]. To avoid such adverse effects on the county we urge the Planning Commission to reclassify these parcels (which could total nearly 1000 acres!) designated Rural Residential (see map attached) to Agricultural/Rural. The Rural Residential designation on these properties is contrary to the policies contained in the Comprehensive Plan and undermines the goals of the Growth Management Initiative.

Thank you for your grand efforts on this plan.

Sincerely,

Janice Wiles
Executive Director
2009 honoree National Women's History Project
"Women taking the lead to save the planet"
2009-2012 Appointed Member to the Frederick County
Sustainability Commission