



# COALITION FOR SMARTER GROWTH

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November 3, 2011

President Candice Kelly  
Commissioner Rubin Collins II  
Commissioner Ken Robinson  
Commissioner Debra Davis, Esq.  
Commissioner Bobby Rucci

Charles County Government Building  
200 Baltimore Street  
La Plata, Maryland 20646

RE: Charles County Comprehensive Plan Update – draft scenarios

Dear President Kelly and members of the Board of County Commissioners:

I have had the honor of speaking in Charles County twice in the last year on smart growth and its economic and environmental benefits. I have been impressed by your revitalization planning for Waldorf and the commitment to competitive, mixed-use development with transit and pedestrian-friendly street networks. My visits to Chapman's Forest, Mattawoman Creek, and the Nanjemoy area have allowed me to see the great natural and historic assets of your county. Finally, I have been impressed by the high level of community involvement in the update to the Comprehensive Plan and the overwhelming commitment to a more sustainable and competitive smart growth future as captured in Scenario One.

Having been contacted by local community members, the Coalition for Smarter Growth has reviewed the proposed scenarios, the Land Use Market Analysis, and the Comprehensive Plan Scenario Evaluations. To summarize, we share the concern about the comparative evaluation of the two scenarios and believe that the scoring of a number of the factors fails to account for countervailing research and potential benefits that would support Scenario I.

**1) Land Use Market Analysis:** The analysis by George Mason University demonstrates more than adequate supply of commercial land and acknowledges that changing the pattern/design of commercial development will mean even fewer acres are needed. The analysis also demonstrates that 24,198 units are already committed in subdivision plans and plats, or nearly 75% of the total demand through 2040. Most of these according to the study are approved as single-family homes. According to the study authors this leaves just 8010 units to accommodate under the long range plan.

The analysis does not appear to fully account for the dramatic predicted shift in demographics and market demand, which will lead to much lower demand for single family homes on large lots, and much higher demand for multi-family, attached and small lot housing. When combined with the impact of rising energy prices and the resulting cost of long commutes, the demand for single-family housing in Charles County could be lower than the study authors predict. But assuming the authors' 8010 unit figure is appropriate, this would require just 2000 acres at a conservative four

units to the acre average, not counting streets, public spaces and resource protection areas. It is my assessment that Scenario One would accommodate this level of demand beyond the units already approved in the county.

The Market and Rural Landowners: The market analysis, which could still overstate the demand for single family housing in light of demographic and energy trends, also indicates that those landowners and developers seeking to profit by suburban development on large areas of undeveloped land, face the real likelihood that the demand simply isn't there. Leaving too much undeveloped land open to development could undermine other landowners with existing subdivision approvals and further depress home values for existing homeowners due to overbuilding.

The market analysis also indicates that for those smaller rural landowners concerned about losing development parcels through the new plan, the potential market for those parcels may be very weak and the potential for lot sales very limited. The expectation that every rural landowner will realize significant value is completely speculative. There is simply too much land and there are too many potential lots under the existing plan and zoning for any one small landowner to be guaranteed of a sale and significant revenue.

With additional incentives for TDR's to be applied to higher density receiving areas in places like Waldorf, the purchase and transfer of development rights may well provide greater certainty of economic return to these rural landowners than waiting for a real estate market which likely will not materialize. In fact, we strongly encourage the county to expand and strengthen its TDR program as a very cost effective approach -- one that advances property values and helps to save the county tax payers tens of millions of dollars in infrastructure costs.

Finally, it is very possible that rural land values will be enhanced by Scenario 1 and the level of downzoning proposed for rural areas. Fewer lots in rural areas and a more protected rural landscape, natural areas, and recreational tourism could cause rural land to maintain or increase in value.

**2) Comprehensive Plan Scenario Evaluations:** While we understand the interest in seeking to evaluate the scenarios according to a range of factors, the evaluations appear to choose factors which favor Scenario 2 and to ignore research which would support Scenario 1.

Of primary concern are the following:

8 -- Support for Town Growth (Score 2 and 5): The criterion used is based solely on the geographic scope of growth, rather than support for healthy, economic growth. Redevelopment of the many acres of vacant and underdeveloped land within La Plata's boundaries under Scenario 1 would support town growth and merit a score higher than 2. Adjustments to Scenario 1 could also be made to add an appropriate amount of land for La Plata's growth while reducing it in other locations.

9 -- Residential Growth Accommodation (Score 4 and 5) -- Based on the projections in the Land Use Market Analysis and based in addition on the significant changes in market demand, it appears that Scenario 1 offers plenty of land and the option of greater diversity of housing type to meet changing market demand and smaller household sizes. The staff's narrative discussion makes clear

that Scenario 1 supplies adequate land.

10 -- Support for Job Creation (Score 2 and 5) -- This widely disparate score is not justified. The narrative states that "both scenarios offer more than adequate land area to support projected employment through 2040." The primary difference appears to be the argument in the narrative that Scenario 2 offers employment opportunities in more locations. The location of jobs should not be a determining factor. Mixed-use development usually requires more skilled trades-people, transit investments generate more jobs than new road construction, and creating vibrant, mixed-use environments is known to offer a competitive advantage in attracting jobs and investment.

11 -- Management of Infrastructure Costs (Score 3 and 3): See comments in below for Fiscal Enhancement.

12 -- Fiscal enhancement (Score 1 and 5) -- This amazingly disparate score fails to acknowledge the growing body of research and data on the fiscal benefits of more compact development. It's also hard to understand given the clear statement in the narrative that the overall cost of road infrastructure is less in Scenario 1 because fewer projects are needed. The Eastern District planning initiative in the Charlottesville, Virginia region showed a savings of 50% or \$500 million on road infrastructure from a compact development scenario. Compact development lowers a wide range of costs for other services as well -- including the per unit capital costs of water and sewer service and the number of fire stations needed to serve a particular population. Police, fire, school busing and many other operational costs are also lower. Mixed-income communities also result in better overall performance for lower income students (recent analysis of Montgomery County's mixed-income policies), potentially saving on operational costs for schools. Recent studies in Sarasota, Florida and Asheville, North Carolina have shown that mixed-use development in urban centers generates more tax revenue per square foot than does typical strip-mall development.

14 -- Road Network Adequacy (Score 2 and 5): The discussion here also appears to be subjective and driven in large part by the positive opinion of the evaluators of the inclusion of the Charles County Connector in Scenario 2 compared to its exclusion in Scenario 1. The inclusion of more villages and village development in Scenario 2 is also likely to have a significant impact on rural roads -- since almost all jobs are still likely to be found outside these village clusters. For both scenarios, the presumption regarding Route 301 as a freeway fails to account for some of the innovative approaches such as the Charlottesville/Albemarle Places 29 study, for balancing through traffic and local mixed-use redevelopment with retrofit of a more connected local street network. A pure freeway would create too much of a barrier between mixed-use development on the two sides of the highway.

16 -- Support for Affordable Housing (Score 3 and 4): The comparison should include an evaluation of the combined costs of housing and transportation. Scenario 1 would potentially offer more households access to transit, proximity to jobs, and the ability to own no cars or just one car, providing significant savings for low income households. The operating cost of single family home ownership is also often underestimated as compared to a good quality multifamily and attached housing.

17 -- Encouragement of Housing Choice (Score 2 and 4): This criterion appears to primarily consider the number of potential locations of housing, rather than the range of housing types that

would be encouraged and the benefits of more housing with better access to transit and services.

18 -- Property Value Maintenance (Score 2 and 4): This criterion focuses narrowly on the land for sale for development but not on the value of existing housing or future housing. It acknowledges that research on the property value effects of downzonings is not conclusive, so the narrative doesn't substantiate the significant difference in the scoring.

**3) Final Thoughts on the Two Scenarios:** The County is to be commended for evaluating a real change in course, as captured by Scenario 1. This scenario would likely result in lower infrastructure costs, more transportation options, better environmental protection, and a more competitive economic position for the county. The commitment to strengthening TDR's and to rural land protection is admirable. In turn, Scenario 2 appears to try to preserve more of the status quo despite the vast changes in the marketplace. Furthermore, the evaluation criteria appear to involve significant subjectivity and poorly substantiated scoring designed to favor Scenario 2 on a number of economic, fiscal, transportation and housing factors.

The inclusion in Scenario 2 of substantial growth in the Bryan's Road area, the Cross County Connector, too many low density residential areas and too much village growth, is likely to make traffic worse and to undermine the county's revitalization and environmental goals. Rather than advance this particular hybrid scenario, the county should embrace Scenario 1, while working with the stakeholders to provide limited tweaks, such as restoring some of the additional growth area to La Plata. We also recommend that the county reduce the growth within Scenario 1 proposed for Route 210 and Route 225. This additional growth area would undermine existing properties in Indian Head and other existing retail centers, negatively impact Mattawoman Creek, and inhibit access along Route 210 and Route 225 to the Naval Facility. Contractor offices should be sited within Indian Head in a mixed-use environment.

In summary, we urge the County to adopt Scenario 1 with the adjustments we recommend, along with adjustments that may be recommended by our smart growth and conservation partner groups. The County has the opportunity to adopt a bold new vision that will benefit the county fiscally, be environmentally sustainable, improve property values and save families money, and will enhance your economic competitiveness. By combining well-designed mixed-use communities, revitalizing Waldorf, La Plata and Indian Head, and preserving and marketing your conservation assets, you will make Charles County a distinctive destination for tourism and a place attractive to both businesses and employees.

Sincerely,



Stewart Schwartz  
Executive Director