



August 20, 2019

Dear Frederick County Council,

Clean Water Action is a national environmental organization with 53,000 members in the state of Maryland, working for clean, safe, affordable water, the prevention of health-threatening pollution, the creation of environmentally safe jobs and businesses, and the empowerment of people to make democracy work. On behalf of our 1,800 members within Frederick County, thank you for the careful consideration you have put into the Livable Frederick Master Plan over the past years. It's crucial that Frederick County as a whole plans collectively for a future that benefits all current and future Frederick County residents, and that the public is engaged in crafting, responding to, and refining this vision. Thank you for engaging in the long public process of refining this plan.

We especially want to commend you for re-inserting language about the climate crisis into the plan. IAs Frederick County plans for the future, these plans must incorporate reducing greenhouse gas emissions and preparing for the significant impacts that climate change is expected to bring. The Fourth National Climate Assessment, released last fall, projects that climate change will bring "the largest temperature increase in the contiguous United States" to our region: 3.6 degrees by 2035. These higher temperatures will cause worse air quality during the summers, contributing to asthma as well as respiratory and cardiovascular disease. Longer periods of higher heat will also allow more mosquitoes and ticks to breed, carrying more disease. More frequent and more intense storms are projected; these will increase the flooding that Frederick already experiences, change the weather patterns that farmers rely on to grow their crops, and increase the amount of polluted stormwater runoff harming our local streams and the Monocacy River. How Frederick grows, develops, and plans between now and 2040 will have enormous impacts on our county's contributions to climate change, and how its impacts are experienced by county residents. Acknowledging and planning for these impacts is an important part of Livable Frederick's mission.

We have significant concerns about the listing of the former Eastalco plant east of Buckeystown as a "New Town" community growth area. While dense development around transit is a valuable goal, a new town in this location would have the potential to put many more cars in the road and further fragment an important agricultural preservation area, without meaningful access to public transit. The area surrounding the plant itself has long been used for farming; in 2010 was zoned for Agricultural and Resource Conservation, then subsequently rezoned for industrial uses. Using Livable Frederick to encourage the development of a new town represents a significant change from the previous decades' worth of planning; maintaining a

designation of agriculture/resource conservation or industrial use would be in keeping with residents' longstanding understanding of the site's future. Although the proximity of the site to CSX's freight rail line might allow for transit-oriented development, without careful planning and cooperation from CSX that has not been evidenced in past transportation projects, additional passenger capacity and a stop on that line significant enough to affect residents' transportation choices would be unlikely. New residential development on the site would be more likely to put more cars on the road than the area's current capacity to handle, straining infrastructure and negatively harming air quality in the area. On the other hand, with its current industrial zoning and history of industrial use, the site could be the perfect location to encourage a solar farm, solar manufacturing, industrial composting, or other industry that would help prepare for climate change and employ Frederick County residents. Please amend Livable Frederick to remove the "New Town" designation and work to preserve the agricultural and industrial value of the site.

We are also concerned by the community growth areas designated east of Linganore and south of Monrovia. While some development is already approved for these sites, many nearby residents opposed and still oppose these developments because of their negative impact on the environment and on infrastructure in the area. Designating them as "community growth areas" in Livable Frederick is an unnecessary endorsement of harmful development decisions of Frederick County's past, which could lead to more harmful growth in these areas in the future. In particular, development east of Linagnore, in the watershed of Lake Linganore, threatens increased polluted runoff entering one of Frederick City's sources of drinking water - a lake already threatened by sediment runoff and algae blooms. Protecting drinking water sources is increasingly important as Frederick County grows and as climate change brings more frequent and larger storms to our region; endorsing further growth upstream of this source may lead to further development and damage public health in the decades to come. Please amend Livable Frederick to remove these community growth areas and work to protect them from further development that could harm Frederick's waterways and drinking water sources.

Thank you again for your consideration of these comments and of the Livable Frederick plan itself.

Sincerely,



Jennifer Kunze
Maryland Program Manager
Clean Water Action
jkunze@cleanwater.org