



County Commissioners:

James J. Moran, At Large

Jack N. Wilson, Jr., District 1

J. Patrick McLaughlin, District 2

Philip L. Dumenil, District 3

Christopher M. Corchiarino, District 4

Telephone Planning: (410) 758-1255

Email Planning: PlanningApplications@qac.org

Telephone Permits: (410) 758-4088

Email Permits: PermitApplications@qac.org

MEMORANDUM

DATE: NOVEMBER 13, 2025
TO: QUEEN ANNE'S COUNTY PLANNING COMMISSION
FROM: STEPHANIE JONES, PRINCIPAL PLANNER
SUBJECT: THE GUNSTON SCHOOL, INCORPORATED
CITIZEN SPONSORED CRITICAL AREA TEXT AMENDMENT
#25-12 – GROWTH ALLOCATION NON-ADJACENCY (ALTERNATIVE) STANDARDS

Chapter 14:1 contains provisions specific to Critical Area text and map amendments. In accordance with § 14:1-74, citizens may file such amendments for consideration only during the first five business days in the months of February and August of each calendar year. This application was submitted during the August timeframe.

BACKGROUND AND OBJECTIVE

The intent of Text Amendment/County Ordinance #25-12 is to amend the existing growth allocation standards within the Chesapeake Bay Critical Area to allow for the award of growth allocation within the Resource Conservation Area (RCA), non-adjacent to existing Limited Developed Area (LDA) or Intensely Developed Area (IDA), for the expansion of non-profit institutional uses that provide secondary education or youth camps that have existing as of June 29, 1988.

PROPOSED TEXT AMENDMENT/ COUNTY ORDINANCE #25-12 TO AMEND § 18:14:1-76(D)

See attachment for proposed ordinance. This amendment has incorporated edits to address concerns of the Critical Area Commission letter dated October 29, 2025 (attached).

COMMENTS

- Within the Critical Area, the approval of growth allocation is a process to authorize a change in the Critical Area designation to develop at a higher density or allow a use other than what the current designation allows.
- Currently § 14:1-76.D outlines location and design standards for growth allocation. It allows for
 - Locating a new IDA in a LDA or adjacent to an existing IDA.
 - Locating a new LDA adjacent to an existing LDA or adjacent to an IDA.
 - As an alternative, if not adjacent or within an LDA/IDA (non-adjacency), the proposed use is required to be a public need for emergency or medical services.
- The proposed amendment would be an alternative to the standards that require adjacency (as noted in the first two of three bullets above).
- The applicant has submitted an alternative non-adjacency standard that would allow for the use of growth allocation in the RCA for the expansion of non-profit institutional uses that provide secondary education or youth camps that have existed as of June 29, 1988.
- New or expanded institutional uses are not permitted in the RCA.
- The amendment includes limiting factors in order to continue the intent and purpose of the entirety of the RCA. These factors include:

- Applicability to existing non-profit institutional uses that provide secondary education or used as a youth camp.
- Use must have existed prior to June 29, 1988.
- Expansion to other parcels may only include those that are adjacent and under the same ownership and proposed use. As well, expansion or intensification on the existing parcel would be permitted with growth allocation as the existing use may not be expanded in the RCA.
- Limited to a total of 150 acres countywide.
 - The existing non-adjacency standard for public need for emergency or medical services is limited to about 200 acres.
- This amendment creates the avenue in which applicants could apply and complete the development review and growth allocation process which includes Planning Commission review and recommendation, County Commissioners approval, and the Critical Area Commission approval.
- Queen Anne’s County has multiple non-profit institutional uses that meet these standards, but mainly one secondary school and multiple non-profit youth camps. At this time, these uses may not expand or intensify because the use is not permitted in the RCA, and/or they are exceeding other standards such as density or lot coverage.
- If the amendment is approved, a growth allocation application could be submitted for the existing site in which the secondary education or youth camp exist and for the expansion on adjacent lands under the same ownership and proposed use.
- As these uses generally reside on large tracts; development envelopes would be utilized to minimize impacts and not require the entire parcel to be subject to growth allocation. These envelopes could be less than 20 acres.
- Growth allocation is a finite resource as the allotted acreage had previously been determined by the State as 5% of the total mapped RCA acreage at the time of program adoption. At the time of original program approval, QAC originally received 1,529 acres of growth allocation, but after providing growth allocation to the Towns and following project approvals the County currently has 458 acres of growth allocation remaining (County Growth Allocation project chart attached).
- Per Md. Natural Resources Code Ann. § 8-1808.1(3), counties may propose an alternative growth allocation standard, but the standard must be consistent with the QAC Comprehensive Plan. Consistency is outlined in the attached applicable laws document.
- This amendment to § 14:1 requires a review and approval from the Critical Area Commission. This review takes place in phases.
 - October 24, 2025: The Critical Area Commission Program Subcommittee reviewed for information which consisted of a discussion with Commission members in order to address potential concerns early on. See attachment which includes comments from the CAC. All comments have been addressed and are included within the proposed amendment.
 - Comment #1 asked the County to confirm a list of sites that would be applicable to this amendment. To the best of our knowledge, there are four non-profit institutional uses that provide secondary education or youth camps that have existing as of June 29, 1988. They include, the Gunston School, Camp Pecometh, Hole in the Wall Gang Camp, and Camp Wright (LDA/RCA).
 - Comment #2 was addressed through adding § 14:1-76.D.6(c)[2][e] that does not allow the use of adjacency standards in § 14:1-76.D(5) to be used in conjunction with the proposed non-adjacency standard.
 - Comment #3 was addressed through adding § 14:1-76.D.6(c)[2][f] and for the fact that anytime in which development is proposed on a lot subject to growth allocation, it must be consistent with the approved growth allocation use and conditions, both with the county and state approvals. If not consistent, then the proposed use is not permitted.

- Comment #4 was addressed through adding a definition to secondary education.
- The applicant has provided further documentation as well, see attachment.

RECOMMENDATION

Per Md. Natural Resources Code Ann. § 8-1808.1(3) counties may propose an alternative growth allocation standard. Being that there is available growth allocation remaining in the county for such uses, that the CAC comments in the October 29, 2025 letter have been addressed, and that these uses are supported, the Planning Staff recommends that the Planning Commission send a favorable recommendation to the Board of County Commissioners.

The Planning Commission recommendation should include consistency with the §14:1 and Md. Code Ann., Land Use, Natural Resources Articles.

- See attached applicable laws and/or include discussion points to provide consistency findings regarding the comprehensive plan and zoning and subdivision regulations.

RESOLUTION

Resolved, that the Planning Commission makes a **FAVORABLE/UNFAVORABLE** recommendation to the Board of County Commissioners regarding Citizen Sponsored Text Amendment #25-12 to amend the existing growth allocation standards within the Chesapeake Bay Critical Area to allow for the award of growth allocation within the RCA, non-adjacent to existing LDA or IDA, for the expansion of non-profit institutional uses that provide secondary education or youth camps that have existing as of June 29, 1988. The Planning Commission provides the following findings:

(*PROVIDE FINDINGS FROM THE STAFF REPORT OR DISCUSSION RELATIVE TO CONSISTENCY/INCONSISTENCY WITH:

- **THE CHESAPEAKE BAY CRITICAL AREA ACT,**
- **ANNOTATED CODE OF MARYLAND (NATURAL RESOURCES AND LAND USE ARTICLE)**
- **THE COMPREHENSIVE PLAN ***)

Attachments: Application with proposed amendment, Applicable laws and findings, Growth Allocation chart, October 29, 2025 Critical Area Commission letter, Applicants response to October 29, 2025 letter, EDC recommendation

**TEXT/CODE AMENDMENT APPLICATION
QUEEN ANNE'S COUNTY CODE – LOCAL REGULATIONS
CHAPTER 14:1 CHESAPEAKE BAY CRITICAL AREA ACT**



Queen Anne's County Department of Planning and Zoning
110 Vincit Building, Suite 104, Centreville, MD 21620
410-758-1255 (phone) • 410-758-2509 (fax)

Pursuant to "Special Provisions Relating to Development Area Classification and Other Amendments in Critical Area District", Article XIV, § 14:1-71 "Amendments to chapter, development area classifications and critical area boundary", of the Queen Anne's County Code – Local Regulations, We _____

The Gunston School, Incorporated
Applicant's Name

of c/o Ryan Showalter, MDSW, 100 N. West Street, Easton, MD 21601 (410) 820-0259
Address Telephone Number

hereby petition the County Commissioners of Queen Anne's County to amend Chapter 14:1, Chesapeake Bay Critical Area Act of Queen Anne's County, Maryland. We propose to amend Article XV, Chapter 14:1-76(D) Growth Allocation as follows: See proposed amendment, which is attached hereto and incorporated herein.

The purpose of the proposed amendment is to permit: the award of non-adjacent growth allocation for the expansion of non-profit institutional uses that provide secondary education or youth camps and existed as of June 29, 1988

John Lewis, Head of School

Applicant's Signature

7/30/2025

Date

Please Note: The application for an amendment to the text of this Code shall, at a minimum state in particular, the Article, Section, and paragraph sought to be amended (noted above). The application shall contain the language of the proposed amendment and all supplemental and supporting documentation must be included (add additional sheets as necessary).

Instructions: § 14:1-74 specifies that applications for text amendments be filed with the Office of the Clerk to the County Commissioners for consideration by the County Commissioners only during the first 5 business days in the months of February or August of each calendar year.

For Office Use Only:

File Number _____
Date Filed August 1, 2025
Date Referred to Planning Commission _____
Date Recommend. Rec'd from Plan. Comm. _____
County Comm. Public Hearing Date _____
County Commissioners Action _____
Date of Action _____

CRITICAL AREA PROGRAM TEXT AMENDMENT
PROPOSED BY THE GUNSTON SCHOOL, INCORPORATED

Underlined = original application

Underlined and bold = incorporated edits to address October 29, 2025 Critical Area Commission letter

§ 14:1-11 Definitions.

SECONDARY EDUCATION

Stage of formal education typically occurring between the ages of 13 and 18.

§ 14:1-76 Growth allocation process.

D. Review criteria.

6. No more than 1/2 of the total growth allocation of the County may be located in the RCA resource conservation areas, except as provided in Subsection D(6)(b) or (c) of this section;

- (a) New IDA intensely developed or LDA limited development areas involving the use of growth allocation shall conform to all criteria of the Commission and shall be designated on the Official Critical Area Map Comprehensive Zoning Map submitted by the County as part of its application to the Commission for program approval or at a later date in compliance with § 8-1809(g) of the Environmental Article of the Annotated Code of Maryland; and
- (b) If the County is unable to utilize a portion of the growth allocated in Subsection D(5)(a), (b) and (c) of this section within or adjacent to existing IDA intensely developed or LDA limited development areas, then that portion of growth allocation which cannot be so located may be located in the RCA resource conservation area upon recommendation by the Planning Commission, conceptual approval by the County Commissioners and award of growth allocation. A developer shall be required to cluster any residential development in an area of expansion in order to minimize impacts.
- (c) Location criteria that varies from the criteria required under Subsections D(5)(a), (b) and (c) of this section may be utilized to:

[1] ~~M~~meet a public need for emergency or medical services including any facility that supports such services.

[~~a~~1] The area of proposed IDA ~~growth allocation~~ may be less than 20 acres.

[~~b~~2] No more than 20% of the growth allocation ~~from the General Pool~~ may be utilized by this nonadjacency standard.

[2] Allow only for the expansion of a non-profit institutional use existing as of June 29, 1988 that provides secondary education or is used as a youth camp, subject to the following:-

[a] Regardless of the existing non-profit institutional use as of June 29, 1988, this standard only applies to secondary education and youth camps.

[b] Only the expansion of the secondary education and youth camp may occur on adjacent parcels under the same ownership and proposed use.

[c] No more than 150 acres of growth allocation may be utilized by the nonadjacency standard of this Subsection [2].

[d] The area of the proposed LDA or IDA may be within one or more development envelope(s) that include all septic and stormwater management facilities and may be less than 20 acres. The use of more than one development envelope on a parcel may be permitted, if approved by the Critical Area Commission.

[e] No LDA or IDA established through the award of nonadjacent growth allocation under this section [2] may be considered to satisfy the adjacency requirement of § 14:1-76(D)(5) for future growth allocation requests not affiliated with the secondary education or youth camp use.

[f] Growth allocation awarded under this section [2] is limited to the education or youth camp use proposed by the application. Transfer of ownership of all or portion(s) of the land subject to the growth allocation shall not be restricted.

APPLICABLE LAWS AND FINDINGS

- *Annotated Code of Maryland/Land Use Article*
 - § 4. Zoning
 - Subtitle 204. Zoning – Designation and Adoption
 - (a) Zoning regulations — Amendment, repeal, and reclassification.
- *Annotated Code of Maryland/Natural Resources*
 - § 8. Waters
 - Subtitle 1808.1 Chesapeake and Atlantic Coastal Bays Critical Area Protection Program – Growth Allocation in resource conservation areas
 - (c)(3) A local jurisdiction may use a standard that varies from the standards required under paragraph (2)(i) and (ii) of this subsection if:
 - (i) The alternative standard is consistent with the jurisdiction’s adopted comprehensive plan; and
 - (ii) The Commission has approved the alternative standard as part of the local program.
 - Subtitle 1809 Approval and adoption of program
 - (h)(1) As often as necessary but not more than 4 times per calendar year, each local jurisdiction may propose program amendments and program refinements to its adopted program.
- *Public Local Laws of Queen Anne's County*
 - *Chapter 14:1 Chesapeake Bay Critical Area Act*
 - *Article II Word Usage, Terms Defined*
 - § 14:1-11 Definitions
 - GROWTH ALLOCATION: An area of land calculated as 5% of total resource conservation area designated land within the critical area (excluding tidal wetlands and federally owned land), that the County Commissioners may convert to more intensely developed areas.
 - *Article XIV Special Provisions Relating to Development Area Classification and Other Amendments in Critical Area Districts.*
 - § 14:1-74 Amendment Procedure
 - Initiation. Text or map amendments may be initiated by resolution of the Planning Commission, County Commissioners or by a petition of the property owner filed with the County Commissioners.
 - ...
 - B. Planning Commission; referral, investigation and recommendation. All proposed map and text amendments that are not initiated by the Planning Commission shall be referred to the Planning Commission for investigation and recommendation. The Planning Commission shall first hold a public hearing at which parties of interest and citizens shall have an opportunity to be heard. At least 14 days' notice of the time and place of such hearing shall be published in a newspaper of general circulation in the County. In addition, the Planning Commission shall post notice of its public hearing on the property for which the amendments are requested and, to the extent possible, based on the best available information, notify all property owners immediately contiguous to the property of the hearing date, time and place.

C. Planning Commission report and recommendations. The Planning Commission shall forward its report and recommendations to the County Commissioners within 60 days of referral, unless an extension of time is granted by the County Commissioners. The recommendations of the Planning Commission shall include discussion of the matters required to be considered by the County Commissioners.

D. County Commissioner conceptual approval. At their regularly scheduled meeting the County Commissioners shall evaluate the proposed amendment on the basis of the report and recommendations of the Planning Commission and either conceptually approve or disapprove the proposed amendment.

E. Critical Area Commission approval. All proposed amendments that receive conceptual approval by the County Commissioners will be forwarded to the Critical Area Commission for review and approval. If the proposed amendment is approved by the Chesapeake Bay Critical Area Commission, it shall proceed to the County Commissioners for final approval.

F. Final approval by the County Commissioners.

(1) After receiving notification from the Critical Area Commission that the proposed amendment has been approved pursuant to the provisions of § 8-1809 of the Natural Resources Article of the Annotated Code of Maryland, the County Commissioners shall hold a public hearing on the proposed amendment which shall not be more than 90 days after notification of approval by the Critical Area Commission. Such hearing shall allow parties of interest and citizens an opportunity to be heard. At least 14 days' notice of the time and place of such hearing shall be published in a newspaper of general circulation in the County.

(2) In addition to other matters pertinent to the proposed amendment, the County Commissioners shall give specific consideration to the following matters:

(a) The purposes set forth in § 8-1800 et seq. of the Natural Resources Article of the Annotated Code of Maryland, the Queen Anne's County Critical Area Program, the Comprehensive Plan and this Chapter 14:1;

(b) The recommendations of the Planning Commission;

(c) The relation of the proposed amendment to the Queen Anne's County Critical Area Program, the Comprehensive Plan, the Growth Subarea Plans; and

(d) The testimony and other evidence presented at the public hearing.

- *Article XV Growth Allocation*
§ 14:1-76.D(6)

...

(c) Location criteria that varies from the criteria required under Subsection D(5)(a), (b) and (c) of this section may be utilized to meet a public need for emergency or medical services including any facility that supports such services.

- *2022 Queen Anne's County Comprehensive Plan*
 - Chapter 1: Introduction
 - Plan Theme, Community Revitalization: Includes infill development of vacant parcels within developed areas and the redevelopment of existing sites (Page 1-13)
 - Chapter 3: Community Facilities & Services

- Goal 3-2, Strategy 1: Develop, affordable, reliable, and state-of-the-art infrastructure and community facilities/services that meet the safety, transportation, communication system, and entertainment needs of the County’s population. Page 3-21.
- Goal 3-4, Strategy 2: Support the educational plans for land acquisition, new facilities, and improvements to existing facilities. (Page 3-23)
- Education:
 - “Additionally, there are private institutions within Queen Anen’s County not within the public education hierarchy – their diversity and distribution impact the growth and activity of communities.” (Page 3-15)
 - “The type and quality of education opportunities are directly linked to the economic viability of a community.” (Page 3-18)
- Table 3-3. School Enrollment & State Rated Capacity (SRC): Both public secondary schools in the County are near or over 100%.
- Table 3-4. School Enrollment Projections: Enrollment projections for high school are intended to increase.
- Chapter 8: Economic Development & Tourism
 - “In 2019, the educational, health, and social services industry continued to ruse in the County and was the industry with the greatest number of employees, accounting for 21.3% of all jobs, keeping its position as the leading job market sector since 2010.” (Page 8-9 and Table 8-6)
 - Goal 8-1, Strategy 3, Recommendation 2: Review permitted non-residential land uses and amend the Land Use and Development regulations as appropriate.
 - Goal 8-2, Strategy 1: Revise County Codes to incorporate provisions for agritourism and ecotourism. (Ecotourism: Environmentally responsible travel and visitation to relatively undisturbed natural areas to enjoy and appreciate nature and its past or present accompanying cultural features, which promotes conservation, has low negative visitor impact, and provides for beneficially active socio-economic involvement of local populations. (Page AA-7)

Critical Area Growth Allocation Summary

The following summarizes the Queen Anne's County Growth Allocation Commitments as of May 15, 2019.

Growth Allocation Summary:	Acres
County Growth Allocation available in 1989	1,529.10
Pre-Mapped Growth Allocation with Program Adoption in 1989	153.00
Total County Growth Allocation available in 1989	1,376.10
Town of Centrevill Reservation	(186.00)
Town of Queenstown Reservation	(200.00)
Town of Churchill Reservation	(4.70)
Net Loss/Gain Growth Allocation	(0.27)
Available Growth Allocation (sub-total)	985.13
Resignations, returns, additions (White's Heritage/GG)	7.24
Growth Allocation Available to Award to County as of 1989	992.37
County Growth Allocation Awarded to Date (1989-2019)	533.89
COMAR 27.01.02.06-3C RCA growth allowance may not exceed 1/2 of county allotment	495.05
County Growth Allocation RCA to LDA & IDA	482.85
County Growth Allocation LDA to IDA	51.04
Remaining LDA to IDA growth allocation	446.28
Remaining RCA to LDA & IDA growth allocation (not applicable to nonadjacency standard)	12.20
Remaining Overall County Growth Allocation as of 10/31/2023	458.48

Project Specific Information on Growth Allocation Awarded to Date

Project Name	Map/parcel/lot	Designation to &from	Effective Date	Acres
Armored Storage, Nashville LLC	57/351, 352, 287	LDA to IDA	Effective: 10/7/2023	2.81
Matapeake Bussiness Park, Sonny Schulz Blvd, LLC	56/221/7	LDA to IDA	Effective: 8/24/19	2.12
KRM Development	48/130/5	LDA to IDA	Effective: 2/23/16	2.90
Eastern shore Genesis	57/90-93	LDA to IDA	Effective: 5/10/14	1.21
University of MD Medical Center	58/820/1	LDA to IDA	Effective: 9/12/09	6.49
RVG Management	57/78&734	LDA to IDA	Effective: 1/21/06	12.05
White Heritage/Gibson Grant	57 / 45	RCA to IDA	Effective: 10/18/05	59.66
White Heritage/Gibson Grant	57 / 45	LDA to RCA	Effective: 10/18/05	(11.16)
White Heritage/Gibson Grant	57 / 45	LDA to IDA	Effective: 10/18/05	3.92
Md General Land Co	57 / 155	LDA to IDA	Effective: 03/01/02	2.12
Ellendale	56/20	RCA to IDA	Effective: 06/22/02	25.73
Four Season	49 / 1,8 347,& 532	RCA to IDA	Effective: 10/05/01	293.25
Grasonvill Station LLC	58 / 155	LDA to IDA	Effective: 12/01/01	5.01
Elm Street Development Corp./Cox Creek Landing	56 / 22	RCA to IDA	Effective: 07/01/00	22.33
Anchorage/Waternman Inc.	55 / 22	RCA to IDA	Effective: 03/17/00	20.16
Md General Land Co	57 / 155, 469, 485	LDA to IDA	Effective: 11/01/06	2.90
Kay Wilson	57/155/6	LDA to IDA	Effective: 11/01/06	0.56
White pines/Mallard homes	48, 49, 56, 57/ 9	RCA to IDA	Effective: 11/19/99	9.85
Gateway Self-storage/George Peters	tm 57 parcel 502	LDA to IDA	Effective: 03/05/99	2.34
Friendly Food Store/Chhay's	57/489/1	LDA to IDA	Effective: 03/05/99	1.95
Homeport on Winchester Creek	58 / 11, 497, 616 &807	RCA to LDA	Effective: 05/23/98	26.55
Kent Island Golf Course /Gibson Grant	57 / 45 & 495	RCA to LDA	Effective 08/31/96	20.08
Kent Island Golf Course / Exon Wendys	58 / 45 & 495	LDA to IDA	Effective: 08/31/96	4.66
K-mart/Breeding Property	56 / 20	RCA to IDA	Effective: 11/07/93	16.40
Total Growth Allocation Utilized to Date				533.89

Wes Moore
Governor

Aruna Miller
Lt. Governor



Erik Fisher
Chair

Nick Kelly
Executive Director

**STATE OF MARYLAND
CRITICAL AREA COMMISSION
CHESAPEAKE AND ATLANTIC COASTAL BAYS**

October 29, 2025

Ms. Stephanie Jones
Queen Anne's County Planning & Zoning
110 Vincit Street, Suite 104
Centreville, MD 21617

Re: Critical Area Commission Program Committee - Queen Anne's County Ordinance #25-12

Dear Ms. Jones,

The purpose of this letter is to provide an update on the progress of the Commission's review and next steps regarding the above-referenced program change. On October 24, 2025, the above referenced text amendment was presented to the Critical Area Commission's Program Committee for information only. During that meeting, Commissioners expressed concerns regarding the implications of this text amendment on future development in the Critical Area and potential additional language that may be needed to address those concerns. Before this text amendment is presented to the full Commission for a vote, the following should be considered and addressed:

1. The Committee asked that the County confirm that this is a comprehensive list of sites this specific text amendment would apply to, both within and outside of the Critical Area:
 - a. The Gunston School
 - b. Camp Pecometh
 - c. Hole in the Wall Gang Camp
 - d. Talisman Farm.
2. The Committee advises adding specific preventative language to the text amendment to prohibit adjacent property owners from using growth allocation approved under this non-adjacency standard to meet adjacency requirements for their own future growth allocation requests.
3. Commissioners expressed concerns should the parcels receiving growth allocation under this non-adjacency standard change ownership in the future. The Committee advises the County to consider additional language that will prevent the unintended transfer of these specific growth allocations to new owners or new uses.
4. The Committee requested that the definition of "secondary nonprofit institutional use" be included in the text amendment.

Ms.Jone's

Oct 29, 2025

Page 2 of 2

In light of the discussion and the Committee's concerns, we recommend that updated language incorporating the Program Committee's feedback, as outlined above, be drafted and shared with our office for review. Please do not hesitate to contact me at 410-260-3489 or margaret.white@maryland.gov if you have any questions or concerns.

Sincerely,



Margaret White
Natural Resources Planner

cc: Charlotte Shearin, CAC

File: 00003036



MCALLISTER
DETAR
SHOWALTER
& WALKER

Ryan D. Showalter
rshowalter@mdswlaw.com
(410) 820-0259 Direct

November 5, 2025

VIA ELECTRONIC MAIL(sijones@qac.org)
Stephanie I. Jones, Long Range Principal Planner
Queen Anne's County Planning and Zoning
110 Vincit St., Suite 104
Centreville, MD 21617

RE: Ordinance #25-12: Critical Area Text Amendment - Growth Allocation Adjacency
Response to Critical Area Commission Program Committee Comments

Dear Ms. Jones:

On behalf of The Gunston School, I appreciate the opportunity to review and respond to the Critical Area Commission Program Committee's October 29th comments on the above-referenced legislation. The Committee requested the County's consideration of four substantive comments, which have been addressed as follows:

1. The text amendment was initiated by The Gunston School and is intended to apply to its campus. The list of facilities located in the Critical Area that may be affected by this text amendment should include Camp Wright. Of course, no facilities located outside the Critical Area are subject to Chapter 14:1 of the County Code, but there are numerous secondary education facilities located outside the Critical Area that are not listed in the Committee's letter, including Wye River Upper School and both County high schools.
2. The Committee suggested that any growth allocation approved under the proposed non-adjacency standard should not be considered to establish adjacency for a subsequent growth allocation request by unrelated owner/uses. We propose to add a new paragraph [e] to the pending legislation to confirm that no IDA or LDA established under this exemption from the growth allocation adjacency could be used to satisfy the adjacency requirement of § 14:1-76(D)(5) for future growth allocation requests not affiliated with the secondary education or youth camp use.
3. Zoning does not regulate ownership of property. I feel strongly any provision that prohibits future subdivision or transfer of ownership would be inappropriate. Nevertheless, any growth allocation awarded under this non-adjacency standard would be established for a specific land use and based on a specific concept plan. Any change in use would require review or potential modification of the growth allocation for the new use. We propose to add a new paragraph [f] to confirm that growth allocation is specific to the education or youth camp use proposed by the application.



4. We propose to amend Section 14:1-11 (Definitions) to establish a definition of "Secondary Education".

The refinements proposed to address the Committee's comments are highlighted in bold text in the enclosed copy of the text amendment. We believe these minor refinements address the comments and questions resulting from the Program Committee's review and appreciate the County's support and approval of this text amendment, which is essential to the continued growth of The Gunston School's facility and educational services.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan D. Showalter", is written over the typed name. The signature is stylized and includes a long horizontal flourish extending to the right.

Ryan D. Showalter



MEMORANDUM

TO: Queen Anne's County Planning Commission

FROM: Heather Bacher, Chair QAC Economic Development Commission

CC: Heather Tinelli, Director, Department of Economic & Tourism Dev.
Todd Mohn, County Administrator
Amy Moredock, Director, Department of Planning & Zoning

DATE: 11/1/2025

SUBJECT: County Ordinance #25-08

At the September 22nd, 2025 Queen Anne's Economic Development Commission (EDC) meeting, we reviewed the Citizen Sponsored Text Amendment, County Ordinance No. 25-12 submitted by the Gunston School for consideration.

The proposed ordinance #25-12 - § 14:1-76.D Growth allocation process, seeks to amend the growth allocation review criteria to include non-adjacency standards for the expansion of non-profit institutional uses that provide secondary education or youth camps that existed prior to June 29, 1988.

After discussing the proposed amendment, the EDC voted to support the proposed text amendment No. 25-12.

Respectfully,

Heather Bacher, Chair

County Commissioners

James J. Moran, At Large
Jack N. Wilson, Jr., District 1
Patrick McLaughlin, District 2
Philip L. Dumenil, District 3
Christopher M. Corchiarino, District 4

Commission Members

Heather Bacher, Chair
Shelly Gross-Wade, Vice Chair
Lee Bridgman, Secretary
Lara Wilson, Treasurer
James P. Reilly
Larissa Costello
Deayna Ewell
Patricia Fox
Mason Popham
John Anderes
Shawna Payne
Kenneth Knight
Douglas Silber