CRITICAL AREA COMMISSION

Program Committee

Information Only

October 28, 2026

Gunston School Property Growth Allocation
Queen Anne's County
Staff: Maggie White

General Information

Type of Program Change: Growth Allocation

Authority: Natural Resources Article §8-1808.1(c);

Description: Queen Anne's County is requesting preliminary feedback from the Program Committee regarding a potential growth allocation to reclassify 45.651 acres of Resource Conservation Area (RCA) to Intensely Developed Area (IDA). The subject property, owned by the Gunston School, is located along the Corsica River at 911 Gunston Road, Centreville, Maryland, and currently operates as a college preparatory educational institution. The purpose of this preliminary Program Committee discussion is to provide general feedback to the county regarding the proposed growth allocation request.

Relevant Laws, Statutes, and Policies

Growth Allocation Standards and Factors (Natural Resources Article 8-1808.1(c); COMAR 27.01.02.06-3(G))
Critical Area Commission Interim Guidance Document - *Incorporating New Requirements for Climate and Equity into Local Growth Allocation Applications*

Commission Staff Considerations

Site Description/Proposed Redevelopment
The property is currently comprised of eight parcels that total 72.76 acres, of which 45.651 acres are located in the RCA. A portion of the property is located within the Critical Area Buffer, which has been expanded for steep slopes. Portions of the property are located within the 100-year floodplain. The property includes areas that have been improved and used as a school since 1911, along with areas currently in agricultural use. There are 20.34 acres of existing forest onsite, of which 19.22 acres are located within the Critical Area.

The proposed redevelopment will occur within two phases and includes the following improvements within the Critical Area: a new Science, Technology, Engineering, and

Mathematics (STEM) Center, an Environmental Field Station, an Athletics Center, a Performing Arts Center, a new residential facility, improvements to the campus circulation system, new athletic fields, pavilions, parking, and piers.

The project, as currently proposed, includes forest clearing; however, no information regarding the amount of proposed clearing was provided at this time.[1] The proposed project is required to meet the Critical Area Commission's 10% stormwater phosphorus reduction requirements. A conceptual stormwater management plan and report were included in this preliminary submittal; this requirement appears to be met through the use sixteen micro-bioretention areas, two grass swales, three non-rooftop disconnection areas and a submerged gravel wetland .

At this time, no non-water dependent impacts to the Critical Area Buffer are currently proposed, and there are no proposed non-water dependent impacts to tidal waters, tidal wetlands, and nontidal wetlands. However, there will be impacts to the Buffer and tidal wetlands to construct the proposed piers.

Alternative Adjacency

The proposed IDA is not located in a Limited Development Area (LDA) or adjacent to an existing IDA. The Critical Area Commission approved an alternative standard to authorize the County to award up to 150 acres of growth allocation on a non-adjacent basis for educational facilities or youth camps. The award of growth allocation under this alternative to the adjacency standard is intended for expansion of a non-profit institutional use (education or youth camp) existing as of June 29, 1988, which the Gunston School satisfies. The growth allocation request represents less than one-third of the total growth allocation available under this non-adjacent standard.

Alternative to the 300-foot Setback

The applicant is not providing a 300-foot setback in the RCA as a faculty residence and portions of a driveway, a pavilion associated with the STEM building, and a portion of an academic building, are located within the 300-foot setback. Per the Commission's growth allocation location standards, the applicant is providing alternative measures for enhancing water quality and habitat in lieu of providing a 300-foot setback from tidal wetlands and waters in the RCA. The current proposal proposes 3.48 acres of planting onsite; however, a portion of this planting is required for Buffer establishment for new lot coverage located outside the Buffer.

[1] There are no forest clearing limits or lot coverage limits in the IDA.

Climate and Equity Considerations
A comprehensive analysis of the climate and equity impacts of the proposal using the Commission's interim guidance document was not submitted at this time[2]. Based on a preliminary review, the proposed development is not located within the 100-year floodplain and based on the topography of the property, no portion of the area proposed for growth allocation is vulnerable to sea level rise or other impacts of climate change. The preliminary submittal also states that the proposed development does not propose any adverse impact, environmental or otherwise, on any underserved or overburdened community.

Consistency with Queen Anne's County Comprehensive Plan
The property is not located within a State designated Priority Funding Area (PFA). The submitted information states that the proposed development is consistent with the 2022 Comprehensive Plan because it allows for appropriate expansion and improvement of an existing institutional use while concentrating development within an existing private school campus, maximizing existing facilities, and incorporating measures that preserve and enhance environmental resources.

Impacts Associated with Wastewater/Addition of Septic Systems
The proposed growth allocation will not be connected to sewer. Instead, the site will be served by up to 9 septic systems and multiple wells.

Impacts to a Priority Preservation Area
Two lots in the Critical Area (A portion of Parcel 151, Lot 1 and all of Parcel 174, Lot 1) are designated as a Priority Preservation Area (PPA); an additional lot outside the Critical Area is also designated as a PPA. Portions of the agricultural fields on these lots will be afforested and protected as riparian forest. The remaining areas will be converted to institutional use as campus development occurs in phases.

Discussion Questions for the Program Committee

1. Currently, the applicant is providing Buffer establishment as the only alternative to meet the standard of not providing a 300-foot setback in the RCA. Would the Commission recommend additional alternative measures to enhance water quality and habitat, and if so, what should be considered (options could include mitigation for all IDA clearing proposed, additional stormwater retrofits to existing structures)?

[2] Commission staff are actively working to develop regulations and guidance for local jurisdictions to incorporate these climate and equity considerations into their local Critical Area programs. An interim guidance document, which Commission staff presented to the Commission in March 2025, provides recommended resources and procedures for analyzing potential growth allocation sites under the lenses of climate resiliency and environmental justice between the effective date of the changes to the Natural Resources Article (October 1, 2024) and the passage of new regulations and local program updates reflecting these changes.

2. The concept plan indicates that the mean high-water line was not established by the current survey and is approximate only on Parcel 174, Lot 1. Is additional information required to ensure the Buffer was field delineated based on existing conditions?
3. Given that the proposal is not located within a PFA and is located within a PPA, would additional information be required to help the Commission fully consider these two (2) factors and determine if additional offsets are needed?
4. Multiple septic reserve areas are shown on the site plan. Is additional information and an assessment of the potential water quality impacts of multiple septic systems required for the Commission to better evaluate this growth allocation request?

Representatives for the growth allocation request, including Queen Anne's County staff, have been invited to attend the Program Committee meeting to answer questions and receive feedback. If you have any questions prior to the October 28th, 2026, committee, please do not hesitate to contact me at 410-260-3489 or margaret.white@maryland.gov.

ATTACHMENTS

1. Proposed Growth Allocation Site Plan
2. Proposed Revision Plat