

CRITICAL AREA COMMISSION
Program Committee
Information Only
April 8, 2026

Island Resort Campground Growth Allocation
Worcester County
Staff: Katie Hayden

General Information

Type of Program Change:

- | | |
|---|---|
| <input type="checkbox"/> Text Amendment | <input checked="" type="checkbox"/> Growth Allocation |
| <input type="checkbox"/> RCA Use | <input type="checkbox"/> Comp Review |
| <input type="checkbox"/> Other _____ | |

Authority:

- Natural Resources Article 8-1808.1(c) – Growth allocation in RCAs;
- COMAR 27.01.02.06 through .06-4 - Growth Allocation minimum local program requirements, Submittal requirements, Environmental Report, Requirements for new IDAs and LDAs

Summary: Worcester County proposes to reclassify 33.46 acres of Resource Conservation Area (RCA) to Limited Development Area (LDA) at Island Resort Campground to expand the campground by 62 RV campsites (Attachment 1). The campground encompasses two adjacent properties: 9537 Cropper Island Rd (Tax Map 40, Parcel 241) and 9552 Cropper Island Rd (Tax Map 40, Parcel 93). The new campsites are proposed primarily on Parcel 93. If approved, the development will need to comply with LDA development standards, including forest/developed woodland clearing limits and lot coverage limits.

Relevant Laws, Statutes, and Policies

Natural Resources Article §8-1808.1 (c) – Relevant Growth Allocation Standards

1. Locate a new LDA adjacent to an existing LDA or an IDA.
2. Locate a new IDA or LDA in a manner that minimizes impacts to habitat protection areas as defined in COMAR 27.01.09, and in an area and manner that optimizes benefits to water quality and impacts to the defined land uses of the RCA.
3. Locate a new IDA or LDA in an RCA at least 300 feet beyond the landward boundary of tidal wetlands or tidal waters, unless the local jurisdiction proposes, and the Commission

approves, alternative measures for enhancement of water quality and habitat that provide greater benefits to the resources.

4. *Locate a new IDA or LDA outside areas vulnerable to climate change.
5. No more than 50% of a jurisdiction's growth allocation may be used to change an RCA to a new LDA or IDA unless the jurisdiction adopts an alternative standard approved by the Commission.

Natural Resources Article §8-1808.1 (c)(4) and COMAR 27.01.02.06-3(G) – Growth Allocation Factors

1. Consistency with the jurisdiction's adopted comprehensive plan and whether the growth allocation would implement the goals and objectives of the adopted plan.
2. Whether new development proposed in the LDA will be served by a public wastewater system or septic systems that uses the best available nitrogen removal technology; complete an existing subdivision; expand an existing business; or be clustered.
3. The use of existing public infrastructure, where practical.
4. Consistency with federal and state environmental protection policies concerning the protection of threatened and endangered species and species in need of conservation that may be located onsite or offsite.
5. Impacts on a priority preservation area, as defined under Agriculture Article, §2-518, Annotated Code of Maryland.
6. Environmental impacts associated with wastewater and stormwater management practices and wastewater and stormwater discharges to tidal waters, tidal wetlands, and tributary streams.
7. Environmental impacts associated with location in a coastal hazard area or an increased risk of severe flooding attributable to the proposed development.
8. *Environmental impacts to underserved or overburdened communities.

*Applicability

This growth allocation request was approved by the Worcester County Commissioners on January 16, 2024; more than eight months before the October 1, 2024 enactment of the Commission's most recent statutory updates that added the climate resiliency standard and equity factor for growth allocations. The County subsequently followed Critical Area Commission staff's guidance to pursue a mapping mistake on Parcel 241 to reclassify 30.7 acres of RCA to IDA, to be consistent with the other Critical Area classifications at existing RV campgrounds. This mapping mistake was approved by the Critical Area Commission on March 4, 2026. Given both the initial timing of the County Commissioner's local approval and the subsequent request and approval of the mapping mistake, the climate and equity considerations were determined to be inapplicable to this growth allocation.

Commission Staff Considerations

We want to note the following for consideration by the Program Committee during this discussion in relation to the standards and factors noted above:

1. Growth Allocation Standard 2/Factor 4: The proposed growth allocation area includes nontidal wetlands, including Wetlands of Special State Concern (WSSCs), Sensitive Species Project Review Areas (SSPRAs), and Forest Interior Dwelling Species (FIDS) habitat.
 - a. The project avoids wetlands and only impacts nontidal wetland buffers.
 - b. In a 2021 letter from DNR's Wildlife and Heritage Service (WHS), it was noted that Porter Neck Bog, a WSSC on the southern portion of the project site, is known to support two state-listed endangered plants. The 2021 letter included protection recommendations for Porter Neck Bog. The letter also noted a second WSSC, Ironshire Swamp. However, a 2007 site visit by WHS staff determined that Ironshire Swamp did not support any rare, threatened, or endangered species. No impacts to the WSSC are currently proposed. However, there appear to be impacts to the 100-foot WSSC buffers considering the Limit of Disturbance (LOD) as shown in Attachment 1.
 - i. Staff notes that WSSCs, including a 100-foot buffer, are regulated by MDE; therefore, MDE review and approval is required for any proposed impacts to WSSCs and their buffers.
 - c. Regarding FIDS, the project must comply with the Commission's *Guide to the Conservation of Forest Interior Dwelling Birds in the Chesapeake Bay Critical Area*. As such, the expanded campground is designed to try and minimize impacts to FIDS interior while also avoiding existing Forest Conservation Easements (FCE) on-site. Overall, the proposed campground expansion will result in 2.79 acres of tree clearing. A total of 2.93 acres of afforestation is proposed onsite to offset this clearing, of which, 2.19 acres is proposed within the 300-foot setback. Furthermore, 21.76 acres of existing forest are proposed to be included within a FCE.
2. Growth Allocation Factor 1: A September 14, 2023 memo from Worcester County staff to the Worcester County Planning Commission states that the growth allocation is not consistent with Worcester County's comprehensive plan and would not implement the goals and objectives of the plan for the following reasons:
 - a. The growth allocation site is zoned as Agriculture, so it would not support the goal to maintain the county's rural and coastal character; and
 - b. would not meet the objective to continue the viability of the agriculture and forestry industry.

However, the same memo emphasizes that the campground is a legally existing non-conforming use, and the property was granted a special exception in January 2008 by the Worcester County Board of Zoning Appeals to expand the existing campground.

Furthermore, the Environmental Growth Allocation Report, dated October 2022, provided by the property owner's consultant states that the growth allocation furthers several objectives in the County's comprehensive plan including the objective to "facilitate the County's economic activity" as the campground will increase tourism.

3. Growth Allocation Factor 5: The site is located within Worcester County's Priority Preservation Area (PPA). The September 14, 2023 Worcester County staff memo to the Worcester County Planning Commission states that the growth allocation is not compatible with the policies of the County's PPA as the campground use is:
 - a. more intense than a minor subdivision;
 - b. not an activity providing farm income; and
 - c. the location is not near an existing population center.

However, the same memo emphasizes that the campground is a legally existing non-conforming use and a special exception was granted in 2008 to expand the campground.

4. Growth Allocation Factor 6: The property owner received conditional approval by the county for a Water and Sewer Plan Amendment. As a result, wastewater from the proposed campsites will be conveyed to an existing onsite package wastewater treatment plant (WWTP), which will be expanded to accommodate the increased flows. Treated wastewater will be spray irrigated on a 15.44-acre agricultural field onsite, adjacent to nontidal wetlands.
5. Growth Allocation Factor 7: The area is predicted to be impacted by storm surge from a Category 2 hurricane. Additionally, a portion of the forested area on the southern edge of the proposed growth allocation area, not currently proposed as part of the campground expansion, is within the 500-year floodplain.

Discussion Questions for Consideration

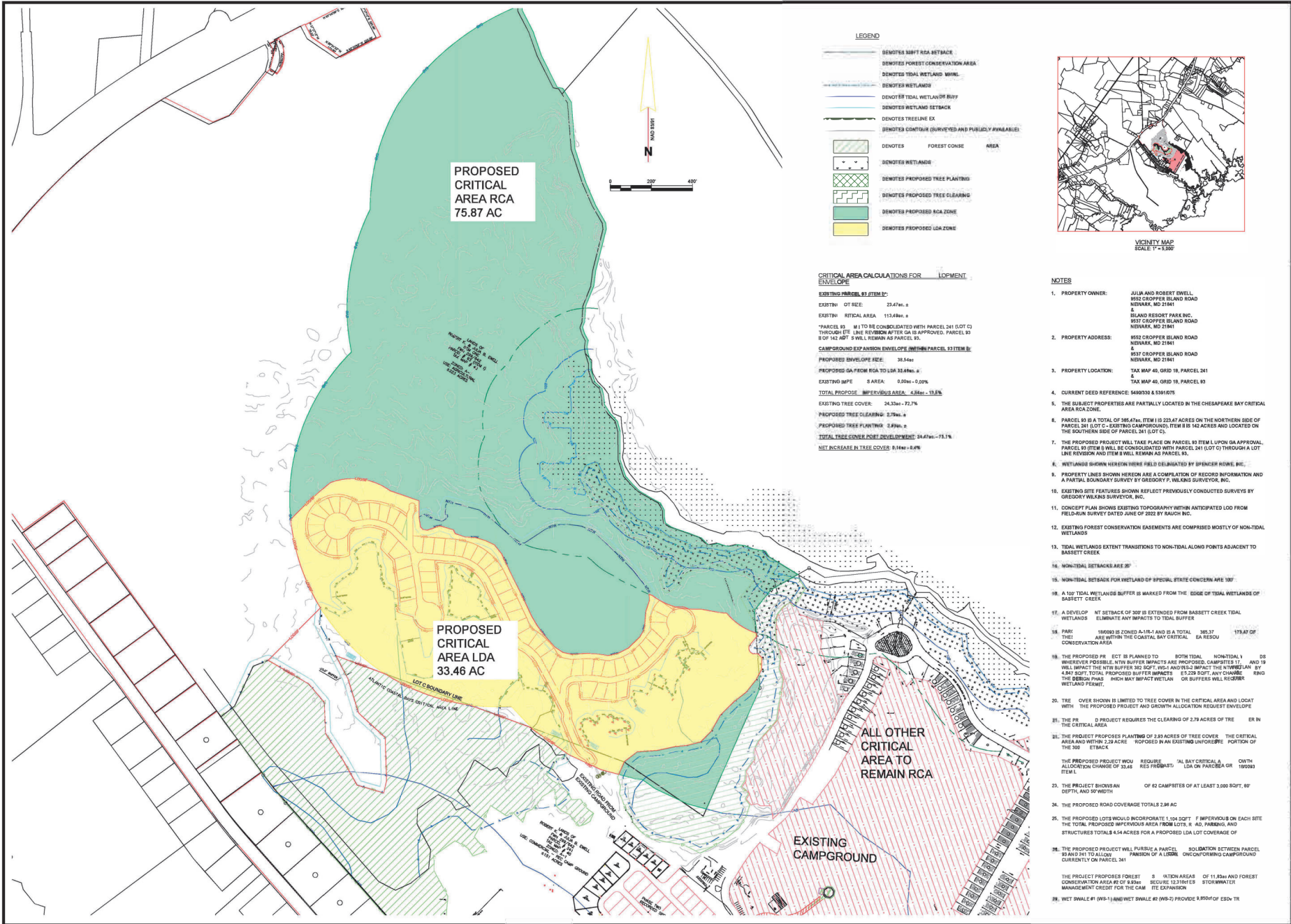
1. Does the growth allocation as proposed minimize impacts to habitat protection areas noted above (FIDs, WSSC buffers, SSPRAs)?
2. Does the proposed wastewater treatment provided minimize environmental impacts including impacts to water quality? Furthermore, given the date of approval (2022), can the county verify that water/sewer capacity is still available for this project?
3. Can the County provide more information regarding the County Commissioners' discussions when considering the growth allocation in light of the aspects listed above that noted a lack of consistency with the Comprehensive Plan, as noted by County staff's memo?
4. Can the County provide more information regarding the County Commissioners' discussions when considering the growth allocation's compatibility with the Priority Preservation Area designation, as noted in County staff's memo?

Please contact Katie Hayden at kathryn.hayden@maryland.gov or 443-848-9160 if you have any questions prior to the Program Committee Meeting.

Attachments:

1. Proposed Growth Allocation and Campsite Development
2. Parcel 93

EXHIBIT 6-2: PROPOSED CRITICAL AREA CLASSIFICATION



PROPOSED CRITICAL AREA Delineation

OF THE LANDS OF

ISLAND RESORT PARK, INC.

TAX MAP 40, GRID 18, PARCEL 93 &

18TH TENTH ELECTION DISTRICT, WORCESTER COUNTY, MARYLAND

PREPARED FOR ISLAND RESORT PARK, INC.

RAUCH engineering design & development services

11375 DORSETT BLVD. SUITE 100, NEWARK, MD 21841
 PHONE: 410-730-8811 FAX: 410-730-3997
 WWW: RAUCHINC.COM

DATE: JULY 2022

JOB NUMBER:

SCALE: 1"=200'

DRAWN BY: J. COOK

DESIGNED BY:

APPROVED BY:

FOLDER REF:

SHEET NO.: 1 OF 2

FILE NO.:

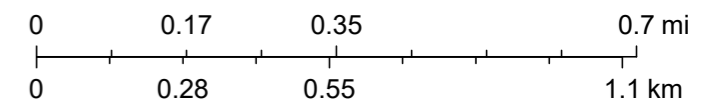
Parcel 93



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- Parcel Boundaries
- Resource Conservation Area
- Critical Areas Counties
- Wetland Area
- Limited Development Area
- Wetlands - Polygon - Special State Concern



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