

February 6, 2009

Mr. Larry Tom
Director
Anne Arundel County
Office of Planning & Zoning
2664 Riva Road
Annapolis, MD 21401

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Dear Mr. Tom:

We greatly appreciate the amount of work that you and your staff at the Office of Planning and Zoning have put into the draft General Development Plan, and are impressed by its breadth and range.

The County has stated many laudable goals, policies and recommended actions in this plan, especially in the Environmental Stewardship section (Chapter 5). We are concerned, however, that there is no implementation plan and no timetable for developing one (Chapter 12). As a concrete example, the plan acknowledges the County's responsibility for meeting TMDL pollution limits in all 12 watersheds. On page 168 the plan notes that the current and future land use plans for the Patapsco watershed are projected to exceed the issued TMDL for nitrogen and phosphorous by 70%, but there is no plan for dealing with this excess pollution.

In a similar vein, we believe that the costs outlined in Chapter 11, the Concurrency Management Plan fall way short of a realistic estimate. For example, the only stormwater cost included is maintenance costs for existing Public Works infrastructure. The costs for mitigating stormwater pollution, the major source of non-point source pollutants are not included. It is not realistic to have a goal of reducing pollution without including an estimate of the resources required to accomplish such a goal.

As another example the On-site Sewerage Disposal System (OSDS) study makes recommendations for stemming the very substantial pollution coming from septic systems by extending sewer lines to communities where appropriate. But the Water and Sewer plan has not been updated to include the impact of these recommendations. As a result, there are costs as well as potential capacity issues that have not been addressed in the GDP.

The GDP can only be effective with a realistic implementation plan based on sound cost assumptions. We feel that your department needs to make a commitment to a timetable for that plan and the process that will be followed in putting it together. Since the plan will require setting priorities, as the GDP points out, we feel that public involvement and transparency is essential for the implementation planning process.

In addition to the above general comments, we had a number of specific suggestions. These include:

- Pg. 41 – We recommend that the goal for open space and land protection be set well above 2,000 acres. The Department of Recreation of Parks has embarked upon an ambitious preservation plan in the headwaters of the South River and has already achieved nearly half that number of protected acres.
- Pg. 59 – While we are very supportive of increasing the requirements for stormwater treatment on re-development sites, the draft MDE stormwater manual will require the treatment of impervious to increase from 20% to 50%. We would like to see Anne Arundel County go beyond the new minimum set by MDE by requiring not just quality treatment of the 50%, but reduction of the runoff volume as well.
- Pg. 61- Add “Evaluate the feasibility of regular inspections of septic systems by the Health Department” to the actions for Policy 2.
- Pg. 216 – The “Capital Improvements to Meet Existing and Future Demand” table does not indicate any costs associated with expanding wastewater infrastructure for new growth.

In addition, we would ask that you extend the public comment period at least until sometime after the Fiscal Impact Statement is released so that the citizens of the County have an opportunity to review the fiscal assumptions that underlie the GDP. Thank you for your consideration.

Sincerely,

Kincey Potter
President

Gwenn Azama
Vice President

Cc: Honorable James Benoit, Honorable Joshua Cohen, Honorable Edward Reilly