

Comments on the
First Draft of the *Calvert County Comprehensive Plan (October 2017)*

Additional Comments Received through January 29, 2018

NAME	GROUP/AGENCY	ADDRESS	Date Received	# of Pages
B. Julie Paluda	Calvert County Department of Public Works, Enterprise Funds	Prince Frederick, MD	1/11/18	1
	Keep Calvert Country		1/16/18, 1/17/18	3
David Bury		Breezy Point	1/16/18	3

From: Paluda, B. Julie

Sent: Thursday, January 11, 2018 5:46 PM

To: Plummer-Welker, Jenny L. <Jenny.Plummer-Welker@calvertcountymd.gov>

Cc: Thomas, Michael A. <Michael.Thomas@calvertcountymd.gov>; Sharma, P. Rai <P.Rai.Sharma@calvertcountymd.gov>; Teter, William J. <William.Teter@calvertcountymd.gov>; Willis, Julian M. <Julian.Willis@calvertcountymd.gov>

Subject: RE: Comprehensive Plan

Good Evening, Jenny,

In the October 2017 Draft, under ***Goal 5: Maintain well-managed and effective solid waste and recyclable materials management systems in Calvert County*** on pages 10-15 through 10-16, please include,

Objective #1: “Protect public health and safety, and preserve the natural environment.” The purpose of this objective relates to developing and implementing future solid waste and recycling initiatives that are both sustainable and are environmentally responsible.

The remaining 4 solid waste objectives follow after, and they are:

Objective 2: Implement and maintain programs that promote source reduction, material reuse, and recycling over disposal.

Objective 3: Ensure cost effective and sustainable material management services to accommodate current and future county-generated and/or county-managed residential and commercial municipal solid waste and recyclables.

Objective 4: Ensure adequate facilities and infrastructure to accommodate current and future county-generated and/or county-managed residential and commercial municipal solid waste and recyclables.

Objective 5: Collectively plan future initiatives, to the greatest extent possible, with internal county departments and regional county jurisdictions, councils, and other potential partnerships.

Thank you,

B. Julie Paluda

Deputy Director – Enterprise Funds

Department of Public Works

150 Main Street, Suite 202

Prince Frederick, MD 20678

(410) 535-1600 x2520

January 15, 2018

Dear Planning Commission Members:

Keep Calvert Country was very pleased with the results of the January 10, 2018 work session regarding the 1st Draft of the Comprehensive Plan. We applaud the decision to:

1. Request a Multi-modal Transportation Plan
2. Restrict the expansion of the Huntingtown Village to only include the high school
3. Add language to more clearly state the County's growth management policies.

Since P&Z Director Mark Willis stated that comments will continue to be accepted until the Plan's adoption, we would like to take this opportunity to share our thoughts on the discussions surrounding the above decisions and certain statements made.

1. Everyone agrees that it is crucial to replace the 1997 Transportation Plan. After all, the consultant included the Transportation Plan in her list of Plans over which the Comprehensive Plan serves as an "umbrella". We have heard it said that the current Comprehensive Plan was not based on any traffic study. We wish to clarify why that is not true: The 2004 Plan was based on the traffic analysis of the 1997 Transportation Plan and the 2010 update had the benefit of the 2008 Southern Maryland Transportation Needs Assessment. In addition, the 2004 Plan and the 2010 update proposed growth management tools that would *decrease* the projected "buildout", (thereby reducing the traffic growth as well). Some argue that updating the Transportation Plan will slow down the Comprehensive Plan process.

We would like to remind the Planning Commission that the current update is actually premature. State law requires Plans to be updated every 10 years, which gives the County until 2020 to adopt a new Plan.

2. There seemed to be mixed opinions as to whether Huntingtown High School should be included in the Village, with some members stating that it is not necessary since it is already constructed. Although staff explained that a waiver would be necessary if the high school needed to be expanded and was not in the Village, our concern again is any minor Town Centers crossing Route 4. As you know, all Comprehensive Plans have recommended against such crossings since the creation of the Town Centers in the 1983 Plan. We fear that additional rezonings may be made to properties adjoining the high school with the justification that "we've already crossed Route 4, so what's the harm in expanding further". Finally, if you review the Priority Funding Area Map (Figure 2-1 in the draft Plan), you'll see that there are numerous schools that are not located within a PFA, most notably Northern High School, which is currently undergoing a complete replacement.

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Community Planning
and Building

3. We were concerned to hear the consultant recommend that the Planning Commission consider replacing the “buildout” projections with some sort of method to control the rate of growth, especially since no fact-based percentage was suggested and no explanation as to how such methods would be implemented was given. Even more disheartening was the consultant’s complete disregard for the Maryland Dept. of Planning’s comments:

“Avoid the assertion that the County could somehow manipulate the growth rate. That seems unlikely.”

Staff indicated, when questioned after the meeting, that St. Mary’s County controls growth via a yearly percentage, which equates to a “building permit cap”, with the growth rate percentage being periodically adjusted. We caution the Planning Commission that such methods may not address the long-term concern that Calvert County’s infrastructure and environment can not sustain unlimited growth. We hope the consultant will provide more facts and information to inform the Planning Commission on the pros and cons of attempting to control the rate of growth.

Finally, it is important to clarify the use of the terms **“housing units”** (used by the consultant) vs. **“households”** (used by the current Plan). The 2016 Census Bureau statistics show the number of **“housing units”** (# of houses, whether occupied or not) in Calvert County is 35,056 while the number of **“households”** (occupied residential units) is only 31,479. As you can see, the use of the proper term is significant when discussing how close the County is to its buildout goal of 37,000 **“households”**. Note: for a detailed explanation, visit <https://www.census.gov/housing/hvs/definitions.pdf>.

We were very pleased to hear the consultant state that the missing “heritage” and “government” sections will be added to the next draft, but concerned that there was no mention of adding a “purpose statement”. Director Willis’ remarks about the Plan being used as a “vision” falls short of the real importance of the Comprehensive Plan. We encourage the Planning Commission to review the Purpose Statement from the current Plan (attached) and request that a similar statement be included in the 2nd draft so that its intended use is clear.

Thank you for the opportunity to share our thoughts on the above topics. We hope the Planning Commission will find this information useful.

Sincerely,
Keep Calvert Country

Overview - Purpose of the Comprehensive Plan

The Comprehensive Plan (Plan) is the official policy document for the County. The Board of County Commissioners, the Planning Commission and County Departments use the Plan as a guide when evaluating proposed projects or changes to the Zoning Ordinance. The State uses the Plan to determine whether or not to provide state funding for a local project (e.g. Rural Legacy, Community Legacy, public infrastructure, Community Development Projects, etc.). Bond rating agencies look at the Plan to see if the County is using resources wisely and in a coordinated fashion. Prospective business owners use the Plan to help them make investment decisions. Residents use the Plan to evaluate how well County government is responding to the goals and objectives written in the Plan.

Comprehensive Plan Goal

The goal of the Comprehensive Plan is to maintain and/or improve the overall quality of life for all citizens of Calvert County by:

- a. promoting sustainable development,
- b. encouraging a stable and enduring economic base,
- c. providing for safety, health, and education, and
- d. preserving the natural, cultural, and historic assets of Calvert County.

The goal is expressed in a series of 10 visions. Each vision is followed by one or several benchmarks. The visions and benchmarks are listed on the following page.

Goal Implementation

1. Use the Comprehensive Plan as the County's primary guiding policy document.
2. Implement the Plan using the following procedures:
 - a. Department Heads: Prepare annual reports to the Board of County Commissioners on progress implementing assigned action items.
 - b. Planning Commission: Determine whether ordinances or special plans need to be proposed or revised.
 - c. Board of County Commissioners:
 - Appoint committees to investigate and report on specific aspects of the Plan as needed.
 - Maintain a 10-year Capital Improvement Plan which reflects the actions called for in this Plan. Place high priority on providing needed infrastructure in the Town Centers, as called for in the Town Center master plans, and identify funding sources to help implement the CIP.
 - Require additional research as needed.
 - Make copies of all reports and actions available to the public.
 - d. Citizens: Remain informed and active participants.

Project Funding

The County's Capital Improvement Program budget reflects the goals established in the Comprehensive Plan and the subordinate plans adopted by the County Commissioners. The CIP schedules projects over a six-year span, based on severity of need, public safety, Commissioners' priorities, and the availability of funding. This plan is updated annually to more accurately reflect current needs and trends. Only those projects planned for implementation in the upcoming fiscal year are actually approved for funding. Each project is tied to a specific reference in the Comprehensive Plan.

From: David Bury [mailto:]

Sent: Tuesday, January 16, 2018 3:23 PM

To: Planning and Zoning <pz@calvertcountymd.gov>

Subject: Additional Comprehensive Plan Comments. Please pass to PC before Wed working session

Sir/Ma'am

I was glad to get clarification at the 10 January Planning Commission meeting that the Planning & Zoning Department and Planning Commission were still taking public comments on the draft Comprehensive Plan. I want to offer some additional comments for consideration, based specifically on issues raised at the 10 January meeting, as the Planning Commission looks toward the scheduled 6 February joint work session with the BOCC.

Can you please forward the attached comments to the Planning Commissioners as soon as possible? They contain specific recommendations that they may want to consider for discussion at tomorrow's (Wed 17 January) Planning Commission work session meeting.

Thank you very much

David Bury
Breezy Point

16 January 2018

Dear Sir/Ma'am

Based on the discussions at last week's Planning Commission work session, I had some additional suggestions I'd like to offer as the Commission prepares for the 6 February joint work session on the Comprehensive Plan.

On the issue of a **Transportation Study**, I was very glad to see the Planning Commission take aboard the numerous citizen public comments concerned with future traffic congestion. I think a full County Transportation study should be contracted that evaluates how much additional residential and commercial growth each Town Center can accommodate before failure occurs. This information will be essential to inform future zoning and development decisions, along with consideration of whether the current 37K household goal should be modified.

- **TIME-PHASING RECOMMENDATION:** Recommend hiring an outside contractor to begin a full County Transportation Study to begin upon completion of the new Comprehensive Plan, and conclude before the Town Center and Village Master Plans are drafted, and before any changes to zoning are drafted. Language should be added to the new Comprehensive Plan emphasizing the need for a Transportation Study phased in this manner. This phasing achieves the goal of not delaying finalization of the new Comprehensive Plan, and at the same time provides the essential data the Town Center and Village Master Plans need to guide future development decisions and zoning changes.

On the issue of **Comprehensive Plan coordination**, one of the factors leading so many citizens to complain about a perceived "rush" to prepare the plan is that the Draft Comprehensive Plan was sent out for public comment *before* it had been completely reviewed by relevant County and State agencies. As a result, a large number of substantive change recommendations were received from the State Department of Planning (25 pages), the County Environmental Commission (18 pages), the Historic Preservation Office (7 pages), the Owings and Prince Frederick Architectural Review Committees, and others. These preliminary changes should have been evaluated for incorporation into the draft Comprehensive Plan *before* it was released for public comment – otherwise, the public may be spending time commenting on text already destined for substantive revision.

- **TIME-PHASING RECOMMENDATION:** To avoid continued public perception of a "rushed" Comprehensive Plan process, recommend that all County agency reviews of the final Comprehensive Plan draft and the mandatory State review process happen sequentially, rather than time-coincident, with the public comment period. It is imperative that citizens be given the opportunity to see all County and State text changes incorporated into the final draft before the public comment period begins. Further recommend that the public comment period be 90 days, to allow for full, detailed interactive presentations by Planning & Zoning staff to all interested citizens groups, which in turn will lead to more informed citizen participation in the public hearing process toward the end of the 90 days.

On the issue of **transitioning from the 37K dwelling goal (aka "buildout") to a percent annual growth goal**, the percentage goal is problematic because it does not take into account transportation, school and other adequate public facilities constraints.

- RECOMMENDATION: Recommend instead that the dwelling goal be retained, with the 37K number reevaluated and updated. The new County dwelling goal should be based on a County Transportation Study, which should establish dwelling goals specific to each Town Center and Village. This recognizes that the impact of new residential development on infrastructure varies, depending on where in the County it occurs.

Thank you very much for your consideration

Yours truly

David Bury
Breezy Point

██████████@██████████

From: Carys Mitchelmore [mailto:mitchelm@umces.edu]

Sent: Thursday, December 07, 2017 11:33 PM

To: Planning and Zoning <pz@calvertcountymd.gov>

Cc: Willis, Julian M. <Julian.Willis@calvertcountymd.gov>; Anderson, Pamela B. <Pam.Anderson@calvertcountymd.gov>; Anderson, Pamela B. <Pam.Anderson@calvertcountymd.gov>; Marney, Ronald A. <Ronald.Marney@calvertcountymd.gov>; bradleybandp@gmail.com; clsjjs33@gmail.com; jluek88@gmail.com; william.a.heine@gmail.com; racebeat@aol.com; ptr_vogt@yahoo.com; stevenssr@calvertnet.k12.md.us; jane.dodds@maryland.gov; craig.simmons@navy.mil; hbudd@whmap.com; Ron Klauda <rjklauda@gmail.com>; Carys Mitchelmore <mitchelmore@umces.edu>

Subject: Comments from the Environmental Commission regarding the Calvert County Comprehensive Plan

Importance: High

To whom it may concern,

Please find enclosed comments from the Environmental Commission regarding the first draft of the Calvert County Comprehensive Plan. We hope that you find our suggested edits helpful and if you need any further clarification please let us know. We also have some questions that we would like responses to. We will also be happy to review the next versions, specifically the implementation plans when they become available.

We were also wondering how our comments (and other public comments) will be addressed. Will we see your responses to our comments and provide us responses to our questions?

Best wishes,

Carys Mitchelmore
Vice Chair EC

On behalf of the members of the Calvert County Environmental Commission

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The Environmental Commission reviewed the first draft Calvert County Comprehensive Plan and have the following comments and suggested edits that are divided into two sections. The first section contains our main points of concern, questions requiring more information and suggested edits. The second section contains suggested edits and minor questions. Both sections are divided into the specific chapters in the report for ease of review. If you require further clarification on any of these suggested edits and our questions, please contact the Environmental Commission and we would be happy to answer them.

One of our main questions is; when will a second more complete draft plan be available for review? We note that there are no implementation plans listed in any of the chapters and so we cannot comment on them. We will certainly be happy to review these when they are available.

We would also like to know what the plan is regarding the addressing of our comments (and all the public comments in general), will we receive a response to our questions?

We hope that you find our edits, comments and suggestions useful. Again please let us know if you have any questions.

(A) Main Points:

Chapter 1: Executive Summary (and draft plan as a whole):

We applaud the goal to cluster development into town centers vs. further reducing the remaining areas of forest and farm. This goal generally reduces the per capita environmental impacts. However, to do that the County has to make town center living attractive enough for those who would otherwise move into a large lot subdivision instead move into the town center. Where is the evidence that the proposed new plan would accomplish this goal? Please explain and provide examples of this in the text.

The overall goal suggests that the landscape of Calvert County is dominated by forests and fields. This is misleading as our landscape is dominated by large-lot (“rural residential”) development. Calvert County’s landscape is largely exurban sprawl, more than 400 named subdivisions. What is the % of County area in the green ‘Farm and Forest’ district in Fig. I-1? Please provide this information. Even then this green area likely contains many subdivisions, is this the case? Maybe the goal should be restated as ‘preserving what’s left’. The second paragraph in the Executive Summary glowingly reports on acres preserved since 1978 (very good!) without balancing that figure with the acreage developed—maybe more like twice the preserved area? Presenting a more balanced view would be useful. To achieve the County’s overall goal of preserving our rural landscape, there should be more said in the updated Comp. Plan about how land preservation will be funded and achieved.

* Pg. 1-1, paragraph 2: Is there a timetable for achieving 40,000 acres of preserved farm and forestland in the county? If reached, will this acreage goal be increased? (also note the same question also applies in Chapter 2, pg. 2-1, paragraph 4). Please expand on this.

* Figure 1-1 Future Land Use Plan—legend should include next to each color category ('District') the area in acres or sq. miles, and the % of County's area (220 sq. miles, 137,000 acres). A second map like Figure 1-1, but showing current land use in the county, should be added to Chapter 1 (and also to Chapter 4).

* Table 1-2 says that the county population was 88,737 in 2010; but the 2010 Comp. Plan said the population in 2010 population was 90,700. Why the difference? Please explain and correct the discrepancies.

* In fact Table I-2 is very misleading as it states population growth in per cent (%) instead of absolute numbers. We are **not** talking about compound interest on a savings account, but about finite resources like land or groundwater. Total environmental impacts (e.g., groundwater withdrawal, wastewater produced, household waste for landfills or recycling, etc.) are the product of average per capita impact X total population. The population growth **RATE** in the 1970s was 67.5% per decade but dropped to 19.0 % by the 2000's. This sounds great, but in fact the population and thus its environmental impact actually **INCREASED** more in the 2000's (14,174) than in the 1970's (13,956). TABLE I-2 bottom should replace % increases with absolute increases, or at least show a second row with absolute increases under the per cents. A ton of wastewater is a ton of wastewater, and an acre of farmland developed is an acre of farmland developed. If per cents are used, it would be more appropriate to show the per cent of remaining sustainable capacity, which per cent would **INCREASE** over time versus decreasing. If/where the plan includes measures to reduce per capita environmental impacts, it should say so.

* Table 1-3 projects 94,600 people living in the county in 2020, but the 2010 Comp. Plan said 96,000. Why the difference? Please explain and correct this. Also, what is the current projected population build-out number? The 1st draft Comp. Plan update does not mention the 37,000 household buildout provision adopted by the county in 1999 that is included in the current (2010) Comp. Plan. Why not?

* Furthermore, Table I-3 projects Calvert County population in 2020, 2030 and 2040, with associated changes in household numbers (Table I-4) and per cent changes. Again, per b) above, change % to absolute numbers or at least add a row with absolute numbers below the per cent numbers in both tables. Incredibly misleading are population projections (Table I-3) based on the current zoning and town center boundaries. Our growth to date, used in those projections, has been in large part the result of the zoning in place at present. The new draft plan calls for expanding town center areas and densities, which obviously would increase future populations beyond what is predicted from past data! Or were tables I-3 and I-4 used to assure people that the stabilization many hope for will happen? We suggest either omitting these tables or show projections based on the additional population, which would result (estimates only, of course) if the new town center populations are enacted.

* Table 1-4: 33,900 households in 2020 in this draft Comp. Plan update vs. 35,500 households in 2020 in the 2010 Comp. Plan. Why the difference? Please explain and correct this discrepancy.

* In the section “Supportive Comprehensive Plan Elements” under each element summary we suggest adding a couple of sentences summarizing the main differences from the existing plan. Many (if not most) readers of this draft have never read the existing plan, or have forgotten what was said. Also, if anything proposed in the present plan was not or insufficiently implemented, please say so.

* The Executive Summary repeatedly comments that TDR use is inappropriate in the farm and forest areas. The wording is unclear about the distinction of TDR sending and receiving areas. It is the RECEIVING areas (transfer zones) that are inappropriate in areas to be kept in farm and forest. TDRs were enacted in the 70s because PDRs (e.g., PAR TDRs) were believed to be politically impossible in a county still poor at the time. PDRs (PAR) are better for land preservation, to be sure, but the Executive Summary makes no mention of the need for PAR funding to reach preservation goals. Instead, TDR requirements in the town centers have been reduced or eliminated to make housing more affordable (by a modest amount).

Chapter 2: Goals and Visions:

* Fig. 2-1: If the Town Center boundaries are drawn by using a one-mile radius (as the map legend says) from the center of each Town Center, why is the circle around the Prince Frederick Town Center larger than at the other Town Centers? Please explain.

* Pg. 2-3, last line in the first full paragraph: Does anyone know what the population density number is to “create vibrancy” in Town Centers and Villages? If yes, what is the number?

* Pg. 2-3, 3rd item in paragraph 2: Please define “by-right development density”.

* Pg. 2-5, under “Changing Employment Characteristics” section: How many workers from neighboring jurisdictions commute to jobs inside Calvert County? Is this number increasing, decreasing, or stable since 1950?

* Pg. 2-6, top of page: Please add a table that gives the median household income for county residents in 1930, 1940, etc. through 2010--like the data presented in Table 2-2.

Chapter 3: Key Issues:

No comments.

Chapter 4: Land Use:

* Elsewhere in this chapter the goal of preserving 40,000 acres is stated (28,903 today). If nature park areas (State and County) are added, it MIGHT be possible to have 50,000 acres of preserved land when land use and population stabilize. This means at best about 1/3 of the County and very fragmented, so can't be said to 'dominate our landscape'. It would be better to state first vision realistically as "*There are still large areas where fields and forests dominate our landscape*". Use this phrasing later where appropriate. Similarly for Goal 1: "*Preserve what remains of the rural character of the county etc.*" It would be helpful to add a pie chart to Chapter 4, between the "Background" and "Existing Policies" sections on pg. 4-2, that shows the most recent land use/land cover category percentages for Calvert County. 2010 data from the MD Office of Planning says that 37.5 % of the county's 137,143 land acres was developed, 14.3% was farmland, 45.8% was forested, and 2.1% was wetlands.

* Tables 4-3 and 4-4 show population and household projections BASED ON CURRENT ZONING AND TOWN CENTER BOUNDARIES. These tables give misleading impressions of gradual population stabilization, which has to happen. The population growth projections in Table 4-3 (5850 increase from 2020 to 2040) is MUCH less than the total current (let alone future) household capacity), viz. >18000 without TDRs and >30,000 with TDRs (Scenarios 4 and 6 in Table 4-5). The changes from one decade to the next should be given IN ABSOLUTE NUMBERS OF PEOPLE AND HOUSEHOLDS, not in % increase from prior decade. Or both could be shown in the same table. The historic decadal increases (Table 4-2) also should use absolute numbers. The 19% growth in the 2000s is actually bigger than the 67.5% in the 1970s.

* Table 4-1 is as of what date? Please add this detail.

* Maps show different present land use (Table 4-3), future proposed land use (Fig. 4-4) and State growth tier categories (Fig.4-1). Please show the acreage and % of County area next to the colored legends. It's important for environmental and other reasons to know these numbers and hard to grasp from a map and even harder to compare to other counties. HOW MANY ACRES ARE CURRENTLY HIGH and LOW Density residential etc.?

* Pg. 4-3 and 4-4. Define forest retention (conservation) TDRs, how many conveyed and what prices. Would forest clearing for higher density housing in expanded town centers create market for that type of TDR? PAR fund---this type of DR is generally called a PDR, or Purchased Development Right.

* Pg. 4-5, 3rd bullet in "Critical Area Protection Program" section: Is it not the case that development in the Critical Area is supposed to be limited, if not prohibited? If so, why do "land use policies for development in the Critical Area which accommodate growth" need to be established? Please explain.

* Pg. 4-5 Planting or replanting and conservation in general in the MD Critical Area mandates or emphasizes NATIVE species. This needs to be added to the second bullet.

* Pg. 4-8, 2nd paragraph: Will this updated Comp. Plan have a goal of increasing the benchmark from 41% to 50% (or higher) --- to achieve the county's Vision and Goals for Town Centers?

* Pg. 4-12, last sentence: Is the last part of that sentence which says "...there is greater capacity to absorb new growth in areas outside the Town Centers." somehow advocating for new growth outside the Town Centers? If so, why? Please expand on this.

* Pg. 4-13 Rural Residential states that "use of TDRs is counter to the idea of directing growth to town centers". What is presumably meant is TRANSFER ZONES (receiving zones) should not be used there, is this correct? Waterfront Communities – has the use of TDRs there ever been proposed or allowed? Please explain.

* Fig. 4-4: Are the exact boundaries of the new land use category, residential, already established? Even if they are just being proposed in this draft Comp. Plan, it would be informative to include a full page map of each of the Town Centers so residents can clearly see what areas outside the existing Town Center boundaries are being proposed for inclusion in the Residential land use category.

* Some town centers are proposed to be expanded, notably Prince Frederick, but neither the text nor any table shows how many acres are to be added to those town centers or villages which are to be enlarged. The Fig. 4-4 map seems to show the expanded boundaries proposed by the consultants who made this draft. The present town or village center boundaries should be shown together with proposed expansions. A separate figure with blown up maps is needed, not just the County wide maps.

* Pg. 4-16 Waterfront communities first paragraph—what limits future development? Most parking lots already built? What determined the waterfront communities listed—leaving out the giant CRE and Drum Point?

* Pg.4-17-18 How many people actually live in Dunkirk? Why not expand that town center to include some denser housing and make it an actual town? Are there plans to build a WWTP and associated infrastructure to serve the Dunkirk Town Center? If not, why not?

* Pg. 4-18, 1st sentence in "Prince Frederick" section: More details are needed about where the expanded boundaries for the Prince Frederick Town Center are or will be. Without seeing clearly how the current Town Center boundaries would be expanded, it's not possible to understand the implications. Have or will the environmental impacts of expanding the Town Center boundaries be assessed before any boundary changes are finalized? These same requests/questions apply to the other Town Centers whose boundaries are being proposed for expansion.

* Pg. 4-18 Prince Frederick—mention the PF2Bay trail (ACLT/PCP) and trailhead right in the town center as a great example of a town center amenity and one connecting with the rural areas and even the Chesapeake Bay. The PF charrette planners made the most of this feature. If you live in PF you don't have to get into a car to access the largest hiking trail system in the county!

* Pg. 4-19 *Visual boundary* between Lusby and Solomons—better to say *a forested buffer zone*. Keep new commercial and residential out of sight from MD 2-4.

* Pg. 4-21, “Residential” section: In addition to plans to connect Residential land use areas to adjoining Town Centers, will the public transit systems be expanded to service these Residential areas? What densities will be allowed in the proposed Residential areas? What about water and sewer in these areas?

* Pgs. 4-22 to 4-25: These are good Goals and Objectives. Will action items and milestone dates be included in Chapter 11-Implementation, that is not yet available for public review? If not, why not? But, here again, there are no milestone dates given for relevant objectives. Objective 2 on pg. 4-22 is unclear, please explain what this means.

* Pg. 4-23, 1st bullet: What “other economic development activities”? In the 2nd bullet, how will the negative environmental impacts be reduced? 2nd bullet under Objective 2: Should the word “to” be “in”?

* Pg. 4-24, 1st bullet: This statement is not clear. Nothing is mentioned about signs or architectural standards under Objective 3. Why not? Under Goal 4, Objective 2: Why are office and business uses not currently allowed in industrial areas?

Chapter 5: Environment and Natural Resources:

This Chapter includes some good valid goals but some things (listed below) that are very important appear to have been omitted. Also the section on mineral resources has many problems as written (see below comments).

* Pg. 5, Goals: The word ‘Encourage’ in Goals 1 and 2 communicates weak rather than strong commitments to achieving these excellent goals. We suggest deleting “Encourage” and instead say, ‘Preserve, protect, and conserve.....’. Also, more information is needed in this Comp. Plan update about how funding will be obtained to achieve Goals 1, 2, and 3.

* Pg. 5-1: Vision: supporting thriving plant and animal communities is not enough! That could be done with 100% Eurasian plants! Suggest the vision sentence be extended by”....communities *dominated by native biota, which have evolved to succeed in Calvert’s climate and soils*”

* Suggest adding these two goals: Goal 5: *Reduce adverse per capita and total County impacts on the natural environment.* Goal 6: *Incorporate up-to-date climate change predictions from now to 2040*

* Pg. 5-1: Suggest adding another goal that says: “Restore lost and/or damaged natural environmental features.”

* Background, p. 5-2. The summary of the topography is incomplete. The upland plain should be described as patchy and locally dissected. It’s barely a plain at all; the county is oriented NS in the north and NW-SE in the south. Certainly not ‘to the southwest’! Say *wetlands, both brackish salt marshes and freshwater.*

* Fig. 5-1 p.5-3. Are the village and town center boundaries the extant ones or the expanded ones proposed in this plan? Please make this clear.

* Pg. 5-4 Wetlands: Even if the State only mandates a 25 foot buffer (we presume it has to be vegetated? Please explain), the County should require this buffer (as in the State Critical Area buffer) to comprise native vegetation.

* Pg. 5-5 top. (NOTE: Cypress not Cyprus Swamp). It is unclear what specific area is involved. The area of cypress trees that was in part illegally cut by developer Anthony Williams a few years ago? The cited report dates from 1981. This might be a good place, if not elsewhere in this chapter, to mention the efforts by past ACLT Exec Director Karen Edgecombe a few years ago to recommend taking a strip of rough topography, not suited for development, located parallel and west of MD 2-4 south of PF OUT of the Town Center, maybe in trade for some more buildable and less sensitive land east of the current town center. This strip of topography is in fact the headwaters of Parkers Creek, a small creek called Sullivan's Branch. Water from that branch ends up flowing east in a culvert under MD 2-4 and MD 765 to become Parkers Creek.

* Pg. 5-5, 2nd paragraph in "Streams and Their Buffers" section: we are not familiar with the source of the 200 miles of county streams. Based on information compiled by Maryland DNR, there are almost 250 miles of wadeable, freshwater streams in Calvert County (1st through 4th order). That number of miles does not include larger, non-wadeable non-tidal and tidal streams. So, we suggest that the 1st sentence in the 2nd paragraph of this section be rewritten to say;" Calvert County has at least 250 miles of streams."

* Pg. 5-6 the paragraph beginning with 'Cliffs...' is wrong or misleading. The cliffs are always referred to as the Calvert Cliffs. The fact they have 'been associated with hundreds of years of erosion' is misleading—these cliffs have been naturally eroding, providing habitats and fossils etc., for around 5,000 years. They are a natural feature of our environment. We don't know what 'upland ends' mean (please explain), but the cliff tops (lips) are mostly 75-100 ft. high (above the Bay), and only around 135 ft. at Point of Rocks. The materials that are exposed in the cliffs comprises variously consolidated sediments, mostly clay, silt and fine sand, except in the southern cliffs topped by sands and some gravel. That "Cliff Stabilization Committee" was formed to get government approval for toe erosion control measures. The ecological or geological or scenic values of the Calvert Cliffs was scarcely considered, and only one geologist was on this committee!

* The next paragraph is factually correct, but the next paragraph mentions "cliff stabilization and shoreline stabilization" What is the difference? Please expand on this. The cliffs cannot be stabilized except at the toe, where toe erosion can be slowed with groins and stopped with toe revetments. Erosion of the cliffs above the toe will continue until an angle of repose is reached. Many existing structures are now so close to the cliff lip that they will at some point be lost, irrespective of toe armoring. What we are saying here is it could be condensed into one or two sentences and included in this paragraph.

* Pg. 5-7, 4th paragraph: Is there a goal for how much sensitive land must be preserved to “maintain Calvert County’s diversity of wildlife and plant life”. If yes, what is that goal? Please expand on this.

* Pg. 5-7, “Resource Protection Area” section: we agree that it is important to delineate and protect buffers around perennial streams and non-tidal wetlands. But please do not forget about protecting intermittent and ephemeral streams that almost always lie just upslope from perennial streams. So, disturbing the buffer areas around intermittent and ephemeral streams can adversely impact downslope perennial streams during rain events. For information about the ecological importance of these smaller and usually not mapped streams, check out this new book (Datry, T., N. Bonada, and A. Boulton. 2017. Intermittent rivers and ephemeral streams, 1st edition, ecology and management. Academic Press, 622 pgs.) and these two links: <https://www.fs.fed.us/psw/publications/reid/1IntermitStr.html> and <https://academic.oup.com/bioscience/article/64/3/229/224292/Intermittent-Rivers-A-Challenge-for-Freshwater-Ecology>. What does the word “most” mean in the 2nd line of the 2nd paragraph in this section? Why not say “all”?

* Pg. 5-8, last 2 lines: what are these two watershed plans? What do these plans require? Are the plans being implemented? Where can we find results, particularly for the Hunting Creek watershed?

* Pg. 5-8 beginning with ‘Regardless of’”, at present it is not established why some nearly pristine Calvert streams rate only fair or poor. The ACLT Exec director Greg Bowen has suggested that Mater Naturalist graduates of the ACLT—managed program be invited to form watershed committees for the watersheds in which they live, to promote citizen awareness of the issues and programs to improve water and watershed quality.

* Fig. 5-2, p. 5-9 are the town center and village boundaries the extant ones or what this plan is proposing? Please explain.

* Fig. 5-2: Suggest adding boundaries and names of the 22, 12-digit watersheds to this map. It is important that county residents know in which watershed they live, and adding the 12-digit watershed boundaries and names to this map would be a good start on this education process.

* Pg. 5-10, “Forested Land” section: The 2010 Comp. Plan says there 81,781 acres of forests in Calvert County (58% of the total land area). Here on pg. 5-10, you say there are 62,500 acres of forest (45% of the land area). Did Calvert County lose that many acres of forests between 2010 and 2017? That doesn’t seem possible; but if so, that’s disappointing. Also, later on pg. 5-17, Goal 3, Objective 2, the 2nd bullet point says: “Retain 90% of existing forest as of 2010.” Well, 90% of 81,781 acres = 73,603 acres. So, if there are only 62,500 acres of forest left in the county in 2017, there is no way that part of Goal 3 can be met. What are we missing here? Also, can you please improve the definition of “forest interior”? The one given is not clear.

* Pg. 5-10 under Forested Land: The plan should say that the county was nearly 100% forested when English colonists arrived in the middle 17th century. It was essentially an Old Growth forest except near Indian hamlets along the Patuxent. It is misleading to say we still have 62,500 acres or 45 % forest. This acreage was calculated not doubt from aerial imagery and includes not only larger contiguous forest but wooded subdivisions. We have plenty of trees but not much forest. This section should also say that *all the remaining forest is second (or third, fourth) growth forest, and much of it is of the order a few decades old*, and does not support the biodiversity of an Old Growth forest such as the 43 acre Belt Woods parcel in Prince Georges County, which should be the gold standard for Calvert County forest restoration. In an old growth type forest *dead trees and decaying logs form an important part of the forest ecosystem*. This section should also state that X percent of our FID type forest is in fact managed for periodic timber harvest and will thus never be allowed to return to a 'natural' state. Somewhere in this chapter a goal should be stated as allowing or promoting y% of our FID type forest to return to a natural old growth state.

* Fig 5-3 p. 5-11. Again are the town and village boundaries the existing ones of the enlarged ones proposed by this draft plan? Please explain. The legend should give the acres and % of total County area for each category. How was the FID area calculated? If as it appears that this was done by taking the remote imagery based forest map (including wooded subdivisions, see previous comment) and measuring 300 ft. in from the 'forest' edges, this would not be a good estimate of actual FID area. Please provide a more accurate map of the actual FID habitat area (which is probably quite a bit smaller than stated).

* Pg. 5-12, "Air Quality" section: Why no mention of atmospheric sources of nitrogen from fossil-fuel burning power plants that deposit nitrogen on the landscape and then much of it ends up in waterways and the Bay?

* Pg. 5-12 last paragraph: emissions from Calvert vehicle use is 'just over one percent', but what is the actual per capita or per household value COMPARED TO THE AVERAGE FOR THE WMA? Please provide this information.

* Pg. 5-13 Mineral Resources. This needs numerous corrections and is not informative as currently written. The Ti-rutile black sands at Cove Point are the only heavy mineral sands ever mined, and this proved uneconomical in the early 1950s. The only diatomite-rich deposits are in NORTHERN Calvert and are of limited value. There is no flagstone mining operation in Calvert County and never has been (quarried in Pennsylvania and simply sold in Calvert?). The Diatomite quarry in northern Calvert near Owings was closed we thought in the early 1930s, when purer deposits were found in Santa Barbara County, CA.

* Fig 5-4 is basically a geological map of outcropping (below surface soils etc.) strata. The legend colors are very misleading—change the legend labels (colors) to reflect what is actually there. There is very little and certainly very little remaining (not developed or preserved) bank run and some washed gravel remaining. Please consult the ca. 1990 MD Geological Survey map of Calvert County geology, online, with locations of gravel quarries. Water resources are

underground and treated in another chapter. Or was the Bay and River meant to be colored blue?

* Pg. 5-13: Are you planning to add anything to this section regarding the extraction of mineral resources?

* Pg. 5-15: Where in Calvert County are there “dam failure” hazards? How did you arrive at the three ranking categories? Are you saying that nuclear wastes stored onsite at Calvert Cliffs Nuclear Power Plant present zero hazard risk to Calvert County residents?

* Pg. 5-15 and table 5-1. State that most of the risks (except for Earthquake, very low risk in our opinion) are related to climate, and climate change models (e.g. just released 2017) predict most of them will certainly or probably increase in the future and certainly be higher in 2040 than today. The table should distinguish between stream flooding and tidal (surge) flooding. They are only marginally related. If tidal flooding is the category listed as Coastal Storm Wind, this is misleading because the biggest storm surges happen when a tropical cyclone passes to the WEST of Calvert.

* What is the basis for concluding that the hazard risk from the Cove Point expansion is “extremely low”, when the lowest hazard risk rankings included in Table 5-1 are “Low”? Do you think most county residents will agree that the hazard risk ranking associated with the Cove Point LNG plant is less than hot summers, hail, or drought?

* Pg. 5-16: The Goals and Objectives are good, but none have any projected completion dates. Why not? For example, under Goal 1, Objective 2, when will you create flood management plans for identified watersheds? Is there a list of which watersheds will have flood management plans created for them...and by when? Under Objective 1, what does the words “discourage disturbance” mean? Can’t you just say “allow no disturbance”? The word “discourage” “is used on other pages in this draft Comp. Plan update. That word doesn’t sound strong enough. Under Objective 2, why allow any development in the floodplain? Under Objective 3, please also mention intermittent and ephemeral streams (see comments above).

* Pg. 5-16 and 5-17, where replanting and buffers are mentioned, it needs to be stated that NATIVE species should or must be used. Objective I Preserve and restore forestland—emphasize need to replant with *native species* and BTW when blight/pathogen resistant native hybrids or genetically modified varieties become available, restore species lost to introduced pathogens (e.g. American elms and chestnuts) or greatly reduced by pathogens (e.g. flowering dogwood). Forest planting or replanting in subdivisions is great and maybe effective in terms of onsite wastewater disposal, but not as great ecologically as restoring/preserving contiguous forest areas.

* Pg. 5-18: It is not clear what the 3rd bullet under Objective 2 means, please explain.

* The importance of the Calvert Cliffs as a regional scenic landmark, and a paleontological/geological internationally recognized treasure, attracting tourist, scientists and students to Calvert County is nowhere mentioned in this chapter. Only at one point is the need to protect eroding cliffs mentioned, to protect Puritan tiger beetle habitat. (top p. 5-17). Page 5-

18 should add this goal: *Goal 5, Make all plans and policies consistent with the most updated accurate climate change predictions from now to 2040, particularly as regards sea level rise, tidal and nontidal flooding, drought and heat wave frequency.*

Chapter 6: Housing:

* Pg. 6-5, 1st bullet under Objective 2: this statement is not clear. Under the second Objective 1, please explain what ‘universal design principles’ are.

Chapter 7: Transportation:

* Pg. 7-5, 2nd bullet from bottom of page: What are “intelligent transportation systems”? Please explain.

* Pg. 7-8, 1st full paragraph: Are there any data to indicate that commuter bus service to Annapolis and Baltimore would be sufficiently utilized to be viable and therefore should be established?

* Pg. 7-9, top of page: we fully support the proposed plans to increase pedestrian and bicycle networks throughout the county. For the Prince Frederick Town Center, split by MD 2/4, two or more overpasses should be constructed to make for safe pedestrian and bicycle crossings. Any at-grade crossings of MD 2/4 for pedestrians and bicyclists within the Prince Frederick Town Center will never be safe no matter where they are located. Paragraph 2 under “Completer Streets...” section: Please plant only native street trees and native plants in medians.

* Pgs. 7-11 to 7-14: Again, more good Goals and Objectives, but no milestone dates for relevant objectives. These need to be added.

* Pg. 7-13, 4th bullet under Objective 1: What are “designated crosswalks”? Please explain.

* General Comment: Chapter 7 does not contain any projections on how much traffic volumes will increase on county roads in the proposed expansions of the Town Centers occur. Current traffic volumes on Routes 2/4 and 231 indicate that the Vision of safe highways ‘with only moderate congestion’ already doesn’t exist, and may be even further out of reach in the future, unless more roadway improvements are made. Will these much-needed improvements be made before any new development occurs in the Town Centers, especially Prince Frederick?

Chapter 8: Economic Vitality:

* In general this is a good chapter but there are some claims that may not be true and some other minor corrections are needed as detailed below.

* It should be noted that the economy of Calvert County is largely driven by bedroom commuters (over 60% of the work force!) driving to rather well-paying professional jobs in the greater DC area. The pay these commuters bring home is then largely spent inside Calvert

County, supporting retail, service and County government jobs. Calvert is among the top in Maryland and the US in terms of median household income. Many if not most commuters could live elsewhere but choose to live in Calvert because of the total quality of the environment—including our County’s “curb appeal”. Any reduction in this quality relative to neighboring counties hurts our economy.

* Pg. 8-2 Goal 4 explain how educational opportunities relate to economic vitality. Is job training/vocational training meant?

* Pg. 8-2, 1st sentence: Do you mean “seafood industry” or “commercial fishing” instead of “aquaculture”? We are not aware that the county’s local economy ever relied on aquaculture.

* Pg. 8-2 para 4—what are the main Calvert jobs bringing commuters into the county? The increase in Dominion employment is largely temporary, is it not? i.e. the construction phase that is soon finished.

* Pg. 8-3, 1st paragraph and Table 8-1: the statement is confusing: “the total employment in Calvert County in 2015 at 34,000”. Are you saying that 34,000 people were employed in jobs within Calvert County, or that 34,000 county residents were employed somewhere, either inside or outside the county? This does not make sense because if you add up the numbers in Table 8-2, you get 6,818 employees----a long way from 34,000. Please explain and/or correct this discrepancy.

* Pg. 8-3 What assumptions were made in these employment forecasts? If there is truly a sea change politically, in reducing the Federal Government, the Table 8-1 forecasts will be way off.

* Pg. 8-4 the two Nuclear Power plant reactors---currently employing 850 per table listing, are licensed (extensions from original) only to 2034 and 2036. Reactors don’t last forever and the nuclear waste is still being stored as dry casks onsite, because no national depository has been approved. Jobs by Industry states that 16.9% are construction. Construction jobs are temporary—when population stabilizes, as it has to at some point, construction jobs will be reduced to redevelopment/reconstruction/remodeling. This is not a long-term source of much employment. Suggest amending this and re-evaluating it.

* Pg. 8-5 and 8-6 under Commuting--- it should be clearly stated that the workforce commuting to the DC area is much better paid (estimate this number?) than the workforce employed in Prince Frederick, many just service and retail workers. The Prince Frederick versus Dunkirk area median and mean household incomes indicate this effect. Next to last paragraph mentions ‘recent reduction in housing values’ but in fact these reductions are relative to the 2004-2010 bubble. Looking at Table 8-5 we see that real property assessable base has stabilized and is as high or higher than it was before the bubble. Table 8-6 is either intentionally misleading or just compares 2016 with five years before to show a loss of 16.2% in assessable base since 2011. Better compare the last three years with the three years just prior to the bubble. Since 2007 there has been as seen in the table a LARGE INCREASE!

* Pg. 8-7, paragraph in “Five-Year Strategic Plan” section: What kind of incentives are being/will be offered to agribusinesses?

* Pg. 8-7 Median Household Income should mention the great spread of household/family incomes between e.g., the Dunkirk area and the Prince Frederick Town Center, i.e. around 140,000 versus 35,000 per year. These are important economic facts and need to be put in a long-range plan especially one that promotes enlarging the Prince Frederick town center! Suggest adding this.

* Pg. 8-8 Agriculture and Agribusiness—most of the farm stand type goods are or can be grown on small truck aka produce farms. Most extant farmland is being planted for animal feed. How much of the local livestock is being fed from such local farmland?

* Pg. 8-9 top. Historically, the watermen who dredged for oysters or fished with pound nets etc. around Calvert came from the Eastern Shore. Under Health Care what are the trends in recent years i.e. increasing average age or % retired in Calvert? This is surely a growth industry. Should mention that retirees don't add to the school budget, which is about 50% of our real estate tax. They also mostly drive less and when they do, not during rush hours. Their per capita environmental impacts are also lower. Next to last paragraph HOW MANY permanent employees at Dominion once it's operational?

* Pg. 8-9, "Retirement" section: Another advantage of more retirees living in Calvert County that could be added to the text here is that retirees do not have kids for which schools, athletic fields, etc. need to be provided.

* Pg. 8-9, last sentence in the 3rd paragraph under "Energy" section: The word "significant" is too vague. Please provide a realistic number of full-time (i.e., post-construction) employees that will be operating Dominion Cove Point and how many will live in Calvert County.

* Pg. 8-10-11 Geothermal is an established mostly low tech LVAC source, using the earth as a thermal energy 'bank'. Even where solar is not possible due to trees or other, geothermal is usually possible and proven, and a potential job growth industry. Bottom of page and next, with Table 8-8. There is no evidence that these claims are true (please provide). What is the evidence that 'Residents frequently request these businesses in Calvert County? The 2011 Fore Consulting Report has apparently never been actually fact-checked in the County, and (please give the link to a complete report and assumptions) seems to be based on some US average % of household income spent on these categories versus what was spent in the county via tax receipts. We don't know how accurate the latter data are, but the assumption of this % is extremely suspect. An economist needs to take a critical look! This was evidently contracted out to support a business and developer lobby's aim to put big boxes etc. in Prince Frederick and other town centers. Taking the supposed annual 'leakage' loss of \$460 million and dividing by ca 35,000 households implies that an average Calvert household spends \$13,000 annually outside the county, after travel and automobiles are excluded. What family spends that much out of the county? Here are some of the flaws in the study:

- a) We have MANY second homes, and owners of those will likely do most of their shopping outside the county no matter what is offered here.

- b) We have 67% of the County’s workers commuting outside the county, and many of those will do much or some of their shopping outside the County on the way home or near their jobs.
- c) The very precise numbers of ‘lost’ spending are not balanced by any estimate of uncertainties, likely errors, unproven assumptions.
- d) No mention is made of the now and in future increasing % of retail commerce is done online.
- e) No mention is made of the fact that the ‘median Calvert household income’ used in this estimate overlooks the disparity in income within the county, e.g. \$140,000 in the Dunkirk area versus \$35,000 in the Prince Frederick area.
- f) No mention is made of the fact that the residents of southern Calvert are near outlets in California (e.g., Lowes), while residents of the Dunkirk area are near outlets (e.g., the Home Depot on MD 301). Why would those folks drive to a similar place in Prince Frederick, which would be further away? We chose these examples because Building Materials, Garden Equipment Stores is the largest category (113 million in leaked income). Suggest removing this table entirely and summarizing the estimates with the caveats above. This one limited study should not solely be used for this long range plan!

* Pg. 8-12 third paragraph and elsewhere under agritourism—add ‘encourage B&Bs to get visitors to spend more money (by spending more time) in the County.

* Bottom of page and elsewhere—retail, restaurant/service jobs such as dominate in Prince Frederick, the Beaches and Solomons are generally much less well paid than professional day jobs to which people commute outside the County. This central reality needs to be articulated in this Economic chapter.

* The Economic development of Calvert County is in many ways related to the environmental impact, both average per capita and total.

* Pg. 8-13, “Education and Worldforce Development” section: To date, Morgan State University’s research lab (PEARL) on the Patuxent River at Jefferson Patterson Park has maintained a pretty low profile. However, with search underway for a new Director, that may change in the future. Therefore, suggest that this institution be mentioned here, along with the College of Southern Maryland and UMCES CBL. Having three higher education institutions in a county of Calvert’s size is a real boon, in my opinion, and should be trumpeted. We really like what’s said in the “Developing Entrepreneurs” section. Now we have to figure out how to make sure the young residents of Calvert County know what’s said in this section of the new Comp. Plan so they will be motivated to take up the challenge and make something positive happen.

* Pgs. 8-14 and 8-15, “Broadband Infrastructure” section: it is great that this topic is included in this new Comp. Plan, but the map (Fig. 8-15) paints a bleak picture for high tech development in Calvert County. What needs to be done to increase fiber optic coverage in the county?

* Pgs. 8-16 to 8-17: Very good Goals and Objectives, but no milestone dates for the relevant ones; please provide these. 2nd bullet under Objective 4: so assume farmers and solar energy companies can create their own “opportunities” for land leasing for solar farms? Is there anything the county can offer in the way of “incentives” to encourage farmers to lease their land for solar farms?

Chapter 9: Water Resources:

* Pg. 9-12: Are the land application systems being used in the county monitored sufficiently to support your statement that “the nutrients from sewerage systems don’t make their way into surface water.”? (3rd paragraph). Do you know what % of on-site septic systems in the county are the advance nitrogen removal systems?

* Pg. 9-13: Is there sufficient land area to handle the projected increased amount of wastewater flow to the Prince Frederick plant in 2030? Please explain.

* Pg. 9-14: Something should be said here about the fact that according to MDE, nutrients are reaching Chesapeake Bay from the Solomons WWTP that discharges to groundwater on site. Also, if upgrades to the Solomons WWTP are being planned, please mention these plans in the updated Comp. Plan.

* Pg. 9-15: When do you anticipate being able to connect the septic systems of at least 672 dwelling units to the Prince Frederick WWTP? Please expand on this.

* Pg. 9-17: What’s being done to deal with the failing septic systems mentioned in the 1st paragraph? Please explain. Also in the last paragraph, are there any plans to retrofit existing stormwater treatment practices in the county that aren’t currently using ESC methods?

* Pgs. 9-18 to 9-20: Here again, good Goals and Objectives, but no projected completion dates. Is that beyond the intended scope of this Comp. Plan update?

* Pg. 18, Objective 3: Are there any plans to encourage use of rain water and gray water for non-drinking purposes to decrease consumption of ground water? If so, they should be added here.

* Pg. 9-19, Objective 2: minimize pollution from WWTP and septic systems. i.e. require new WWT systems to be land application systems”. This is unclear... it seems like this is being used as the ‘perfect’ solution to count an input of N and P to the Bay, how does it work exactly, how is it proven to be an ideal solution, please explain, how will the N and P not run-off the land, make it’s way and pollute groundwater etc.? Also the suggestion that we send sludge from Solomons WWTP to VA landfills – is exporting our waste the best solution?

* Pg. 9-20, 2nd bullet: this objective is not at all clear. Please reword or amplify it for clarity.

* Pg. 9-20: Given the nice four paragraph discussion on “Managing Stormwater and Non-Point Source Pollution” on pg. 9-17, why aren’t there more objectives under Goal 4 on this page that

emphasize, even more, ESD and other innovative stormwater management practices that we assume (please expand if this is the case), Calvert County will require for all new development?

* Table 9-1 under Agriculture, are those declines for fixed farm areas or does this include the reductions in loading caused by reductions in farm areas or tilled farm areas? Under 'Forest' are you including large 'forested' areas actually large lot wooded subdivisions which of course are all on septic systems?

* Table 9-2 Why NA for Constellation water use? The plant is one of the largest water uses in the County, is it not? Scientists Cliffs has several wells not just one, both in Piney Point and Aquia. Please edit and correct.

* Pg. 9-3 second paragraph you say "Calvert County's aquifers have declined..." but do you mean the water level in Calvert County's aquifers have declined? Please edit.

* Pg. 9-10 last paragraph do you really mean iodized or is it ionized (so as to become soluble)? Please correct.

* Pg. 9-13 second paragraph---If the Prince Frederick WWTP will need an increase of 25,000 gallons per day to meet projected 2030 flow, is this based on the proposed expansion of the Prince Frederick town center proposed in this draft plan? If so, how will this be accomplished, with no impacts on Parkers Creek, given this is now the largest preserved, relatively pristine watershed in the County? Please explain.

* Pg. 9-17 Sewage Problem Areas, do you mean that NEW subdivisions (Apple Green and Cavalier Country) are having septic system problems? Please explain.

* Monitoring local streams for fecal coliform bacteria—why is this not proposed anywhere? Along the Calvert Cliffs in particular, small densely populated subdivisions like Scientists Cliffs have small streams that debouch directly onto and cross the beach. Kids play in those streams! There needs to be a fecal (ideally also human fecal coliform) monitoring or spot checking program. Elevated levels would suggest one or more septic systems in these SMALL watersheds are failing, which would help the search for failing systems.

(B) Additional Edits and comments that require no action:

Chapter 1: Executive Summary:

* Pg. 1-1, paragraph 3, line 3: I suggest this phrase be inserted: “, while still preserving natural resources.” after “seeking”.

* The 10 visions listed on pg. 1-2 are good and also nice that they are the same visions included in the 2010 Comp. Plan.

Chapter 2: Goals and Visions:

No comments.

Chapter 3: Key Issues:

No comments.

Chapter 4: Land Use:

* Pg. 4-16, last paragraph: Developing a system of greenways is an excellent idea.

Chapter 5: Environment and Natural Resources:

* Pg. 5-2, paragraph 4: Suggest rewording the 2nd sentence to read as follows: “It is often the case that the value of the ecological services they provide is much greater than their commercial return.”

* Pg. 5-2, sentence 1 in “Sensitive Areas” section: To be consistent with what’s presented in Fig. 5-1 and on other pages in the Comp. Plan, suggest rewording this sentence to read as follows: “Sensitive areas include wetlands, streams, buffers, floodplains, steep slopes, cliffs, and habitat for rare, threatened, and endangered species.”

* Fig. 5-1: Add “Area” after “Critical” in the map legend.

* Pg. 5-4, “Wetlands” paragraph: suggest inserting “, either year-round or seasonally,” after “shallow water” in the 1st sentence. Also suggest deleting “and” in the 2nd sentence and inserting “, and seasonal (sometimes called ‘vernal’) pools.” after “bogs”.

* Pgs. 5-6, 1st line: suggest adding “from disturbance of these areas.” after “habitat”. Also suggest changing the next sentence on that page to read: “Steep slope areas are therefore unsuitable for development.”

* Pg. 5-6, 1st sentence under “Habitat for Rare…….” Section: suggest adding: “—related losses of forest and wetlands.” after “development” and delete “on forested land.”

* Pg. 5-7, 1st full sentence on the page: suggest rewording this sentence to read as follows: “The Maryland Department of Natural Resources has established the Puritan Tiger Beetle Habitat Conservation Program to protect the species. This Program requires that any individual intending to alter a Puritan Tiger Beetle habitat must first apply for and obtain a permit. If the permit is issued, the individual must mitigate any adverse impacts to the altered habitat.”

* Pg. 5-8, 2nd sentence in “Watershed Management” section: suggest rewriting this sentence to read as follows: “Calvert County lies within portions of the West Chesapeake Bay and Patuxent River basins.” In the second paragraph in this section, why not also mention non-point source runoff from residential lawns?

* Pg. 5-12, 1st paragraph: Delete the repeated sentence. Suggest adding this sentence to the end of this paragraph: “In addition to all these environmental benefits, forests are a renewable economic resource.”

Chapter 6: Housing:

* Pg. 6-1: The Vision, Goals, and State Visions all look good

Chapter 7: Transportation:

* Pg. 7-1: The Vision, Goals, and State Vision all look good.

* Fig. 7-2: Rt. 231 is an Arterial and should be colored red (or orange?) on this map.

* Pg. 7-7, last paragraph in “Local Roads” section: we agree 100% that larger roads in rural areas will almost certainly encourage more development and should not happen.

* Pg. 7-12, last bullet under Objective 1 of Goal 4: I suggest “and increase the number of” after “Review”.

Chapter 8: Economic Vitality:

* Pg. 8-1: The Vision, Goals, and State Vision and Plan all look good

Chapter 9: Water Resources:

* Drinking water should be defined in this chapter as including all household uses, washing, bathing etc., not just drinking, also garden watering etc. except where grey water is used. You are talking about DRINKABLE water.

* MGD is Million Gallons per Day and should be defined at top of each table.

* Why is storage capacity (should be a volume) given in MGD? Storage is not a rate.

* Define DI treatment in one sentence, maybe with footnote.

* Third paragraph on that page—the elevated As is mainly in southern Calvert part of Aquia, should be stated. Table 9-4 caption is incomplete (Less that ?)