

Larry Hogan
Governor
Boyd K. Rutherford
Lt. Governor



Charles C. Deegan
Chairman
Katherine Charbonneau
Executive Director

STATE OF MARYLAND
CRITICAL AREA COMMISSION
CHESAPEAKE AND ATLANTIC COASTAL BAYS

August 14, 2017

Ms. Kelly Krinetz
Anne Arundel County
Office of Planning and Zoning
2664 Riva Road, MS 6301
Annapolis, Maryland 21401

Re: Wroxeter Estates - Sketch
S17-018; P17-0066-00NS

Dear Ms. Krinetz:

Thank you for submitting information regarding the above-referenced subdivision for review and comment. The applicant seeks sketch plan approval for a major subdivision to create five (5) single family lots, four (4) of which will be within the Resource Conservation Area (RCA) of the Critical Area. The proposed subdivision will consolidate and reconfigure one existing parcel (Tax Map 39, Parcel 51) and one existing lot (Lot 1 of the Severn View Subdivision). Parcel 51 is approximately 55.8 acres, approximately 28.5 acres of which are located within the RCA. Parcel 51, is waterfront and contains four existing dwellings, three of which are within the RCA portion of the parcel. Lot 1 is approximately 0.47 acres in size, entirely within the RCA, waterfront, and is currently unimproved. The four proposed lots within the RCA are seeking a riparian right and access to Asquith Creek.

Parcel 51 and Lot 1 are considered nonconforming parcels under Critical Area law and regulations. The three existing dwellings within the RCA portion of Parcel 51 exceed the required RCA density of one dwelling unit per 20 acres. The County has recognized these three dwellings as an R1-Residential District type nonconforming use. Additionally, one of those dwellings is located within the Critical Area Buffer. Lot 1 is also considered a nonconforming lot under Critical area law and regulations because it is less than 20 acres and located within the RCA. Given the proposed subdivision seeks to maintain four development rights in the RCA, the County must determine the application meets the lot consolidation and reconfiguration regulations in COMAR 27.01.02.08.

After reviewing the proposed subdivision, this office has the following comments:

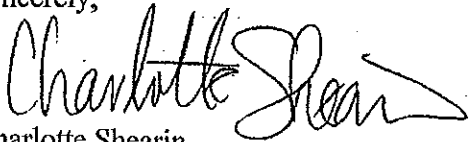
1. Information regarding the date of recordation of Lot 1 as a legally buildable lot is required per COMAR 27.01.02.08. It is unclear when Lot 1 was first created and whether

it is considered grandfathered under COMAR 27.01.02.07; and how and when it became known as Parcel 370.

2. Please confirm that Lot 8 is no longer a part of this subdivision. Lot 8 was included in the letter dated November 30, 2016 from the County to the applicant but it does not appear to be a part of the submitted plans.
3. It is unclear whether the Buffers onsite have been drawn accurately on the submitted plans. The Critical Area Buffer, including the Buffer to tributary streams, should be expanded for steep slopes, erodible soils, hydric soils, or nontidal wetlands. Please refer to COMAR 27.01.09.01.E(7) for instructions on how to expand the Critical Area Buffer, including the Buffer to tributary streams. Please submit a separate exhibit showing the Critical Area Buffers onsite for existing and proposed conditions so that a determination can be made as to whether they are accurately drawn.
4. A 200-foot Buffer is required for subdivisions in the RCA. This Buffer should also be expanded for steep slopes, erodible soils, hydric soils, or nontidal wetlands. This Buffer should be fully established in native woody or wetland vegetation, per COMAR 27.01.09. If the 200-foot Buffer, as expanded, is not currently fully established in native woody or wetland vegetation, a Buffer Management Plan should be provided which shows where planting will occur, as well as planting details related to species, number of each species, maintenance and monitoring requirements, etc. (COMAR 27.01.09).
5. The subdivision plat and development plan must include notes restricting any Open Space within the Critical Area from conversion to a future lot and limiting any uses to passive recreational uses only.
6. The County must make written findings, per COMAR 27.01.02.08.F, as to how the proposed subdivision meets the lot consolidation and reconfiguration regulations. Specifically, the County must address how the proposed subdivision will not create an additional riparian parcel or lot, or waterfront lot, or any other parcel or lot deeded with water access, when the current configuration allows two (2) waterfront parcels or lots (Parcel 51 and Lot 1), and the proposed reconfiguration/consolidation will allow four waterfront lots.
7. The plat should include a lot coverage table that shows how the Critical Area portion of the subdivision will meet the County's 14% lot coverage limit and how the remaining allowable lot coverage will be distributed among the Critical Area portion of the subdivision.
8. The Commission will not support a variance request to allow greater lot coverage, greater impact to steep slopes, or greater impact to any habitat protection areas including the Buffer; than development activities within the configuration currently in existence. Comments regarding the variance request to impact steep slopes and the Critical Area Buffer will be provided under separate cover.

Thank you for the opportunity to provide comment. If you have any questions, please contact me at (410) 260-3480.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlotte Shearin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Charlotte Shearin
Regional Program Chief

File: AA 560-17



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor
Mark Belton, Secretary
Joanne Throwe, Deputy Secretary

August 22, 2017

Anne Arundel County
Office of Planning & Zoning
2664 Riva Road
Annapolis, Maryland 21401

RE: Environmental Review for Wroxeter Estates, 185 Wroxeter Road, Arnold, Tax Map 39, Parcel 51 & 370, Anne Arundel County, Maryland.

Dear AA Co. P&Z:

The Wildlife and Heritage Service has determined that there are no official State or Federal records for listed plant or animal species within the delineated area shown on the map provided. We would like to point out, however, that our remote analysis suggests that the forested area on this property contains Forest Interior Dwelling Bird habitat. Populations of many bird species which depend on this type of forested habitat are declining in Maryland and throughout the eastern United States. The conservation of this habitat is mandated within the Chesapeake Bay Critical Area and must be addressed by the project plan. Specifically, if FIDS habitat is present, the following guidelines should be incorporated into the project plan (as applicable):

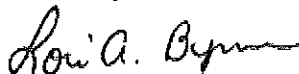
1. Restrict development to nonforested areas.
2. If forest loss or disturbance is unavoidable, concentrate or restrict development to the following areas:
 - a. the perimeter of the forest (i.e., within 300 feet of existing forest edge)
 - b. thin strips of upland forest less than 300 feet wide
 - c. small, isolated forests less than 50 acres in size
 - d. portions of the forest with low quality FIDS habitat, (i.e., areas that are already heavily fragmented, relatively young, exhibit low structural diversity, etc.)
3. Maximize the amount of forest "interior" (forest area >300 feet from the forest edge) within each forest tract (i.e., minimize the forest edge:area ratio). Circular forest tracts are ideal and square tracts are better than rectangular or long, linear forests.
4. Minimize forest isolation. Generally, forests that are adjacent, close to, or connected to other forests provide higher quality FIDS habitat than more isolated forests.
5. Limit forest removal to the "footprint" of houses and to that which is necessary for the placement of roads and driveways.
6. Minimize the number and length of driveways and roads.
7. Roads and driveways should be as narrow and as short as possible; preferably less than 25 and 15 feet, respectively
8. Maintain forest canopy closure over roads and driveways.
9. Maintain forest habitat up to the edges of roads and driveways; do not create or maintain mowed grassy berms.
10. Maintain or create wildlife corridors.

11. Do not remove or disturb forest habitat during April-August, the breeding season for most FIDS. This seasonal restriction may be expanded to February-August if certain early nesting FIDS (e.g., Barred Owl) are present.
12. Landscape homes with native trees, shrubs and other plants and/or encourage homeowners to do so.
13. Encourage homeowners to keep pet cats indoors or, if taken outside, kept on a leash or inside a fenced area.
14. In forested areas reserved from development, promote the development of a diverse forest understory by removing livestock from forested areas and controlling white-tailed deer populations. Do not mow the forest understory or remove woody debris and snags.
15. Afforestation efforts should target a) riparian or streamside areas that lack woody vegetative buffers, b) forested riparian areas less than 300 feet wide, and c) gaps or peninsulas of nonforested habitat within or adjacent to existing FIDS habitat.

The Critical Area Commission's document "A Guide to the Conservation of Forest Interior Dwelling Birds in the Chesapeake Bay Critical Area" provides details on development standards and information about mitigation for projects where impacts to FIDS habitat cannot be totally avoided. Mitigation plantings for impacts to FIDS habitat may be required under the local government's Critical Area Program. The amount of mitigation required is generally based in whether the guidelines listed above are followed.

Please be sure to let us know if the limits of proposed disturbance or overall site boundaries change and we will provide you with an updated evaluation. Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at (410) 260-8573.

Sincerely,



Lori A. Byrne,
Environmental Review Coordinator
Wildlife and Heritage Service
MD Dept. of Natural Resources

ER# 2017.1222.aa
Cc: C. Shearin, CAC



M A R Y L A N D


Office of Transportation
2664 Riva Road – 3rd Floor – MS-6600
Annapolis, MD 21401

Ramond Robinson
Director of Transportation

MEMORANDUM

DATE: August 11, 2017

TO: Kelly Krinetz
Office of Planning & Zoning/Development Division

FROM:  Jon Mayer, Transportation Planner II
Office of Transportation

SUBJECT: Wroxeter Estates
Subdivision #17-018/Project #17-0066-00NS

SAP: Broadneck

The subject Sketch Plan submittal has been reviewed from a Traffic Engineering standpoint. The following comments/ recommendations are provided at this time:

1. Old County Road is classified as a Collector Roadway (Rural). Subsequently right of way dedication/ frontage improvements consistent with Standard Paving Detail P/5 are required along all frontage to said roadway at this time.
2. Wroxeter Drive is classified as a Local roadway. Subsequently right of way dedication/frontage improvements consistent with Standard Paving Detail P/7 are required along the entire frontage at this time.
3. The boundary of the site fails to coincide with County Geocortex mapping with regards to the adjacent Cromwell Property/Parcel 455. Please clarify.

This Office offers no objection to granting Sketch Plan approval based the satisfactory resolution of issues raised in Comments 1-3 at Final.

cc:
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**ANNE
ARUNDEL
COUNTY**

M A R Y L A N D

Office of Planning and Zoning

Philip R. Hager, Planning and Zoning Officer

MEMORANDUM

TO: Development Division

FROM: Mark Wildonger, Planner

THROUGH: Cindy Carrier, Long Range Planning Administrator

SUBJECT: Long Range Planning Comments – General Development Plan and Small Area Plan Compliance

DATE: August 2, 2017

Name of Project: Wroxeter Estates
Subdivision Plan: S17-018
Project No: P17-0066-00-NS
Site Development Plan#:
Location: 185 Wroxeter Drive, Arnold
Tax Map 39, Block 9, Parcel 51 & 370
Planning Area: Broadneck

Summary:

The applicant proposes to subdivide the property into five single family home lots. The property is located at the intersection of Wroxeter Drive and Old County Road.

The 56.003 acre property is zoned R1 and OS and is located within the Broadneck Small Area. The property has a land use designation of Residential Low Density and Natural Features on the 2009 General Development Plan (GDP) Land Use Map. It is located in a Managed Development Policy Area and is not within the Priority Funding Area. The site is not within the County's Greenway network.

The 2009 GDP and the Broadneck Small Area Plan (SAP) do not make any specific recommendations for this parcel.

Findings:

The project is consistent with the overall goals and policies found within the Broadneck SAP as well as the 2009 GDP.

Recommendations:

None

Per Article 18 of the County Code, Small Area Plans are to be used as a guide in the future development of land and in the location of public services and facilities. While many SAP recommendations are not subdivision requirements, the recommendations should be considered in conjunction with development plan review and incorporated in future subdivision plans and site development plans when feasible.



**ANNE
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M A R Y L A N D

Office of Planning and Zoning

Philip R. Hager, Planning and Zoning Officer

MEMORANDUM

TO: Development Review Division

FROM: Cindy Carrier, Long Range Planning Administrator

SUBJECT: Long Range Planning Comments – Water and Sewer Plan Compliance

DATE: 8/14/17

Name of Project: Wroxeter Estates
Subdivision Plan: S17-018
Project No: P17-0066-00-NS
Site Development Plan:
Location: Southeast intersection of Wroxeter Drive and Old Country Road
Tax Map 39, Parcels 51, 370
Planning Area: Broadneck
Growth Tier: II

Summary:

This is sketch development plan submittal that proposes to create five single-family lots. The site is located in the Future sewer service category in the Broadneck SSA and the Existing water service category in the Broadneck 220 WPZ. The applicant proposes to utilize private septic and public water systems for the development of the site.

Findings:

The development plan is in compliance with the 2013 Water and Sewer Master Plan. Note that the property is located in Growth Tier II. The utilization of on-site septic systems is considered interim. Properties must connect to public sewer when available.



INTEROFFICE CORRESPONDENCE

Fire Department

County Executive, Steven R. Schuh
Fire Chief, Allan C. Graves

TO: Planning & Zoning

CC: SUBCOMMENTS@aacounty.org

FROM: Lt. Stephen E. Stanton II, Fire Marshal Division

DATE: August 9, 2017

SUBJECT: P17-0066-00-NS Wroxeter Estates

This office is in receipt of the submittal package dated 7-31-17

Approval is withheld pending compliance with the following comments:

1. Pending receipt of a fire flow report; area shall be served by a water supply system for fire protection purposes capable of providing 1,000 gpm @ 20 psi residual for two (2) hours in addition to peak hourly demand.
2. The proposed cul-de-sac has the appropriate turn radius, however the pavement width must be increased to 28 feet to facilitate the movement of fire apparatus to "Road B".
No Parking will be allowed within the cul-de-sac. One sided parking within the cul-de-sac would be permitted if the pavement width was increased to 36 feet.

NO PARKING will be required by the fire department as deemed necessary for adequate access and operational requirements. Roadways and fire lanes must provide 20' of width, free of any obstructions, including parked vehicles.

The developer should be aware that the narrow street width indicated will require that no on-street parking will be allowed.

For consistency in the Review Process, please enclose a copy of all comments developed by this office for the Site Development Review process, along with the final approved site plan, with any submittal to the Permit Application Center.

Larry R. Tom, Planning and Zoning Officer

MEMORANDUM

TO: Kelly Krinetz, Critical Area, Development Division, OPZ, MS 6301

FROM: Anastasia Poulos & Darian Beverungen, Cultural Resources Division/OPZ, MS 6401

SUBJECT: **Wroxeter Estates (S17-018, P17-0066 00 NS)**

DATE: August 11, 2017

The Cultural Resources Division reviewed the sketch plan for Wroxeter Estates. The following comments apply. *Please note that all Article 17 requirements must be met prior to plan approval.*

A. Historic Resources: Site Visit Required

The project area contains historic structures that contribute to the Arnold Family Farmstead. A site visit by the County's Historic Sites Planner is required to evaluate and document the property's resources. Please contact Ms. Darian Beverungen (410-222-7466 or pzbeve19@aacounty.org) at your earliest convenience to arrange a site visit.

Please remove the "Historical, Archaeological, & Cemetery Note" (see sheet 3A for example) from the Sketch Plan that states no resources are present on the property.

B. Archaeological Sites: Phase I Survey Required

This property has extremely high archaeological potential. Cartographic evidence and historic aerials indicate that this historic property has been in use as a farmstead since at least the early part of the 19th century and is associated with the historic Arnold family in Anne Arundel County. Per County Code **17-6-502**, a Phase I archaeological survey (in compliance with State/County guidelines) is required before plan approval. If significant resources are identified, the applicant may be required to redesign in order to preserve or mitigate adverse impacts to the resources. This office must receive and review the report before it can approve the plan. Please submit the following directly to the Cultural Resources Division:

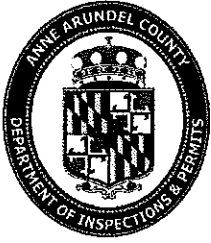
- (1) The Phase I archaeology report with any relevant archaeological site forms appended (please refer to the County Guidelines, located at <http://www.aacounty.org/departments/planning-and-zoning/cultural-resources/archaeological-sites/>). **Note:** In order to avoid any unnecessary delays, required reports and any supplemental documentation must be received at least 7 working days prior to review deadlines, so that staff can have adequate time to review.
- (2) If the owner plans to donate the artifacts recovered during the Phase I survey to the County, please include an artifact donation form, completed by the owners (download at <http://www.aacounty.org/departments/planning-and-zoning/cultural-resources/archaeological-sites/>). **Note:** If artifacts are to be donated to the County, an artifact donation form and all artifacts from the survey need to be submitted together with the report directly to the CRD before final approval.

Please contact Anastasia Poulos with any questions (#410-222-7486 or pzpoul44@aacounty.org).

C. Cemeteries: The project area does not contain any recorded cemeteries.

D. Scenic and Historic Roads: This property is not located on a scenic and historic road.

E. Determination: **Approval Withheld** (*Pending Archaeological Survey and Site Visit*)



Daniel L. Kane, Director

Memorandum

TO: Kelly Krinetz, OPZ Development Division

FROM: Sarah E. Fowler, P.E., Engineering Division, Department of Inspections and Permits

SUBJECT: Wroxeter Estates
S17-018
P17-0066-00NS
Sketch Plan Review

DATE: August 11, 2017

Traffic Review

The above-referenced project has been reviewed for Traffic issues and the following comments apply:

The developer has opted to address adequacy of public facilities at this stage of the development process. Adequacy of Public Facilities is being addressed as follows:

Adequate Public Facilities for Roads:

Adequacy of Public Facilities for Roads has been addressed for this development. Trip generation information was submitted showing that the proposed development will generate fewer than 50 trips per day.

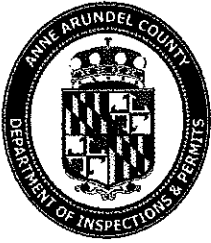
The following are comments regarding the plans as submitted; only the comments indicated in the closing paragraph will require a point by point response upon resubmittal:

A. Plans

1. Driveways should not be located off of the hammerhead of a t-turnaround.
2. It is unclear why a cul-de-sac is proposed.
3. It is unclear why two roads are proposed.
4. The right-of-way and property boundary are unclear on the northern side of the property; GIS layers show a different boundary than the plans.
5. Road A should not intersect Wroxeter Road in the middle of the curve.
6. Sight distance information will be required for the intersection of Road A and Wroxeter Road.
7. Show and label the B&A Trail which abuts the property.

B. Determination

We are unable to grant Sketch approval of these plans until comments A1-7 have been adequately addressed.



Daniel L. Kane, Director

Memorandum

TO: Kelly Krinetz, Development Division, Office of Planning and Zoning

FROM: John Bory, Engineer, Engineering Division, Department of Inspections and Permits

SUBJECT: Wroxeter Estates
Subdivision Number S 2017-018, Project Number P 2017-0066 00 NS
Sketch Plan Review

DATE: August 16, 2017

Engineering and Utility Review

The above-referenced project has been reviewed for Engineering and Utility issues and the following comments apply:

Adequacy of Public Facilities

The developer has opted to address adequacy of public facilities at this stage of the development process. Adequacy of public facilities is being addressed as follows:

Utilities:

The site will be served by private septic systems. Adequacy of facilities for sewerage will be deferred to the Anne Arundel County Department of Health.

The number of EDU's was determined to be less than five, one existing and four proposed, therefore a SWAMP analysis of public water service was not required. Adequacy of facilities for utilities has been adequately addressed for this development. The consultant/developer is being advised that the availability of capacity is not guaranteed until an allocation request has been processed and approved by the Department of Public Works.

Storm Drainage:

Adequacy of facilities for storm drainage has not been addressed. It has not been adequately demonstrated that the onsite drainage system and stormwater management system installed by the developer includes environmental site design to the maximum extent practicable, complies with the stormwater requirements of the Anne Arundel County Code, and is capable of conveying through and from the property, the design flow of storm water runoff originating on the site to an adequate outfall; and offsite downstream drainage systems are capable of conveying the design flow of storm water runoff to an adequate outfall between the several site outfalls and Points of Investigation POI which are yet to be shown.

The following are comments regarding the plans as submitted; only the comments indicated in the closing paragraph will require a point by point response upon resubmittal:

A. Roads

The site has frontage along Old County Road and Wroxeter Drive which are county public roads currently classified as Collector and Local roads respectively. The roads along the entire frontage of this development have not been fully improved to the required county standard based upon their classifications, therefore right of way dedication and frontage improvements are being required.

Offsite road improvements are not being required.

1. No public road internal road will be entertained. The road design should be per the private road section in the SWM Design Manual.
2. As shown a modification to private road standard for section, geometry for grade and terminus is required.
3. Sight visibility for new road must be addressed by at minimum a line of sight profile.
4. Actual extent of frontage on Old County Road and right-of-way width on both roads must be clarified.
5. Modification M-15344 as it relates to road right-of-way widening and road improvement cannot be supported at this time.
6. Lot drives may not access from the turn around.

B. Storm Drainage

Storm drainage through and from this development is accomplished by utilizing open swales.

1. Multiple site discharge points and POIs exist and must be analyzed in actual pre-existing condition and ultimate post developed condition by zoning.
2. Flows must be noted on DA plan for each drainage area.
3. Outfall statement on cover sheet will need to be revised.
4. Total drainage area to any POI includes off site flow.
5. Photographs must be from most hydraulically distant point to the actual POI.
6. Tc flow paths must be from hydraulically most distant point and include segments with flow data and surface condition for each segment.
7. Qp must be addressed for each drainage area in which development occurs, flows change and discharge is to private property.
8. Provide a color mapping of soils with percent coverage of total site area and each drainage area
9. Add a certification note to the resource mapping and have it signed and sealed.
10. Provide table from Line 67 of the checklist.

C. Stormwater Management

Stormwater management for this project is being addressed through the use of private drywells, community grass swale, private pervious paving and community micro bio-retention.

1. Qp must be addressed for each drainage area in which development occurs, flows change and discharge is to private property.
2. No SWM practices are allowed in or credit allowed to be taken for flows to environmentally sensitive areas or their buffers.
3. Bio-retention practices may not be founded in or supported by fill.
4. Swale grade and flows for both Cpv and Qp must be addressed with this application.
5. Shared communal SWM practices must be in open space, not on private lots and their maintenance covered by the HOA.
6. Disturbed area differs in all computations in the report.
7. Provide table described on line 12 of the checklist.
8. Per line 73 of the checklist explain why vegetated areas and practices are not more extensively used to provide SWM.
9. Provide Pe table per line 96 of the checklist.
10. Provision of treatment and management of stormwater for road outside the RCA may not be provided in the RCA.

D. Utilities

This development is expected to be served by:

- i) Public water in the Broadneck water service area (#32) – Existing Category.
- ii) Private sewer in the Broadneck sewer service area (#5) - Future Category.

A SWAMP analysis of water and sewer has not been requested because the increase in the number of EDU's is less than five, four. A fire flow test may be required by the Office of the Fire Marshal. The consultant is encouraged to request this directly from the Department of Public Works.

There are no Utilities comments. However, it must be noted the water and sewer service areas are both Broadneck and the categories are existing and future respectively.

E. Sketch Plan

1. Add a lot area and impervious area per lot chart to the plan set.

2. What is the purpose of the additional fire apparatus turn around? A sufficient terminus seems more appropriate. Note no parking signage requirements for internal road.
3. Lot 2 dwelling should be reconstructed outside the steep slope and associated buffer.
4. What is the five-foot utility easement around the end of the cul-de-sac to be used for?
5. On resource mapping show buildable area and shade areas to be protected.
6. Show zoning setbacks on site plan.

F. Flood Plain

1. Delineate the F.E.M.A. tidal floodplain and note the elevation.

G. Recommendations to Resolve Design Issues

1. Consider relocating road to obtain better site visibility.
2. Consider relocating lots outside RCA.

H. Determination

We are unable to grant Sketch Plan approval of these plans until comments A 1.-6., B1.-10., C1.-10., E 1.-6. and F 1. have been adequately addressed.



Daniel L. Kane, Director

Memorandum

TO: Kelly Krinetz, Development Division, Office of Planning and Zoning

FROM: John Bory, Engineer, Engineering Division, Department of Inspections and Permits

SUBJECT: Wroxeter Estates
Subdivision Number S 2017-018, Project Number P 2017-0066 00 NS
Sketch Plan Review

Modification Numbered M-15344

DATE: August 18, 2017

Engineering and Utility Review

The above-referenced modification requests have been reviewed for Engineering and Utility issues and the following comments apply:

Frontage Improvements –

Necessary right-of-way widening and road improvement is not be proposed.

The site has frontage along Old County Road and Wroxeter Drive which are county public roads currently classified as Collector and Local roads respectively. The roads along the entire frontage of this development have not been fully improved to the required county standard based upon their classifications, therefore right of way dedication and frontage improvements are required.

The request cannot be supported.

Disturbance to Steep Slope and Associated Buffer, Specimen Tree Removal, Provision of Adequate Recreational Area and Community Meeting

There is no Engineering objection to these requests.

These recommendations are deferred to the Planner.

Schools

Jones

Sewer Park

Sewer Park

Buffer not expanded correctly

Boundary lines do not
match tax records