YVS LAW LLC

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June 16, 2026

Sterling P. Seay, Planning Administrator
Anne Arundel County Office of Planning and Zoning
2664 Riva Road, MS 6403
Annapolis, MD 21401

Re: Critical Area Growth Allocation Application ("Application") – Herrington Harbour North Marina
385 Deale Road, Tracys Landing, Anne Arundel County, Maryland 20779
Tax Map 77, Grid 11, Parcel 89, Lot 1R and 330 Highview Road, Tracys Landing, Maryland 20779, Tax Map 77, Grid 17, Parcels 268 and 19

Dear Ms. Seay:

This firm represents Herrington North LLC ("Herrington Harbour" or the "Applicant"), the owner of three contiguous parcels known and designated as Tax Map 77, Grid 11, Parcel 89, Lot 1R along Deale Road and Tax Map 77, Grid 17 and Parcels 19 and 268 along Highview Road, Tracys Landing, Maryland, consisting of approximately 79.18 acres, regarding the enclosed Critical Area Growth Allocation Application. Herrington Harbour respectfully requests to reclassify 4.762 acres of Resource Conservation Area ("RCA") to Intensely Developed Area ("IDA") in order to support the expansion of Herrington Harbour's boat storage capacity. Approval of this growth allocation will ensure that Herrington Harbour North Marina Resort can continue to advance its commitment to environmental stewardship while simultaneously providing direct benefits to Anne Arundel County in the form of additional employment and tax revenue-generating opportunities.

This Application only relates to the portion of the Herrington Property classified as RCA and zoned General Commercial Marina District (MB), currently the entirety of Parcel 268 consisting of approximately 1.26 acres and a 3.502 acre portion of Parcel 19 (a total of 4.762 acres). For purposes of this Application, the entirety of the Herrington Harbour North property, Parcels 19, 268, and Lot 1R, consisting of approximately 79.18 acres will be referred to as the "Herrington Property." The Herrington Property is split zoned Heavy Commercial Marina District ("MC"), General Commercial Marina District ("MB"), and Residential District ("R1"). The majority of the Herrington Property is known and operated as Herrington Harbour North Marina Resort and is split zoned MC and MB. This Application only applies to the 4.762-acre MB zoned portion of the Herrington Property currently classified as RCA (the "Subject Property"). The reclassification of the Subject Property from RCA to IDA aligns with the Subject Property's commercial marina zoning designation and is consistent with the zoning district's allowable uses. The Subject Property directly abuts a priority funding area and will be part of an IDA that exceeds 20 acres. The requested critical area reclassification will facilitate the marina's expansion within an area specifically planned and zoned to accommodate growth and economic activity in the County.

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Applicant's Pending Modification Application

Pursuant to Herrington Harbour's modification application (MOD-2026-0085)[1], Herrington Harbour proposes to amend the lot lines of the three existing parcels in order to consolidate the portions of Parcels 19 and 268 zoned MB, consisting of a combined 4.837 acres, into what is currently known and designated as Lot 1R (currently improved by the marina).[2] The resulting lot, Lot 1RR as shown on Sheet 2 entitled Critical Area Exhibit of the Growth Allocation Plan Set, will consist of approximately 69.24 acres. Pursuant to the modification request, the remaining 9.94 acre portion of the Herrington Property, located entirely within existing Parcel 19, will become Parcel 19R.

If the Applicant's modification request is approved and an amended plat recorded, this will result in two lots, Lot 1RR and Lot 19R. Lot 1RR shall consist of the 3,267 square feet (0.075 acres) outside of the critical area and zoned MB, the 4.762-acre Subject Property, and existing Lot 1R improved by the marina consisting of 64.40 acres. The combined total area of Lot 1RR is 69.24 acres. Parcel 19R shall consist of all remaining acreage of the Herrington Property, 9.94 acres.

Existing Property

Lot 1R, the main Herrington North property on which the entire marina is currently located, consists of approximately 64.40 acres and is partially classified intensely developed area ("IDA") and partially classified Resource Conservation Area ("RCA"). The RCA portion of Lot 1R consists of tidal wetlands and is not impacted by this Application.

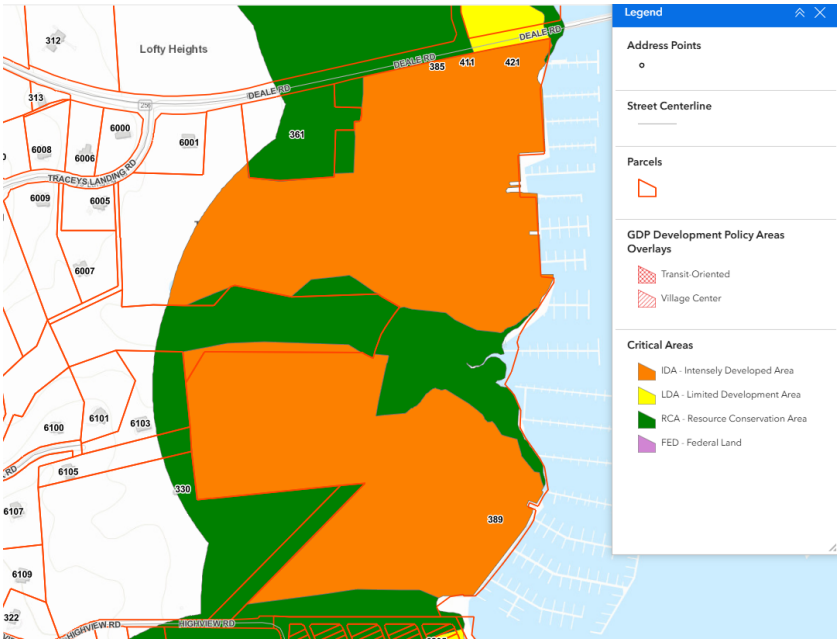
Currently, Parcel 268 consists of approximately 1.26 acres and Parcel 19 consists of approximately 13.52 acres. The entirety of Parcel 268 is classified as RCA but only a portion of Parcel 19 is within the critical area and classified as RCA. Herrington Harbour respectfully seeks reclassification to IDA for all RCA classified land that is zoned MB, approximately 4.762 acres as shown on the accompanying Growth Allocation Plan Set. The resulting critical area IDA classification for the Subject Property would be consistent with the General Commercial Marina District zoning. MB zoning is Anne Arundel County's second most intense maritime zoning district and permits a full range of commercial services. The Subject Property's current RCA

[1] A modification to allow for the recordation of an amended plat for property within the critical area pursuant to Anne Arundel County Code §17-3-801 was submitted on May 6, 2026 (MOD-2026-0085). If approved, the amended plat will align the property line of Lot 1RR with the MB zoning district line. This growth allocation request is only applicable to the 4.762-acre portion of proposed Lot 1RR. Upon modification approval and amended plat recordation, Lot 1RR shall consist of approximately 69.24 acres. A copy of the modification application is attached hereto for reference. Sheets 2 and 3 of the Applicant's Growth Allocation Plan Set show the resulting two properties pursuant to the modification request.

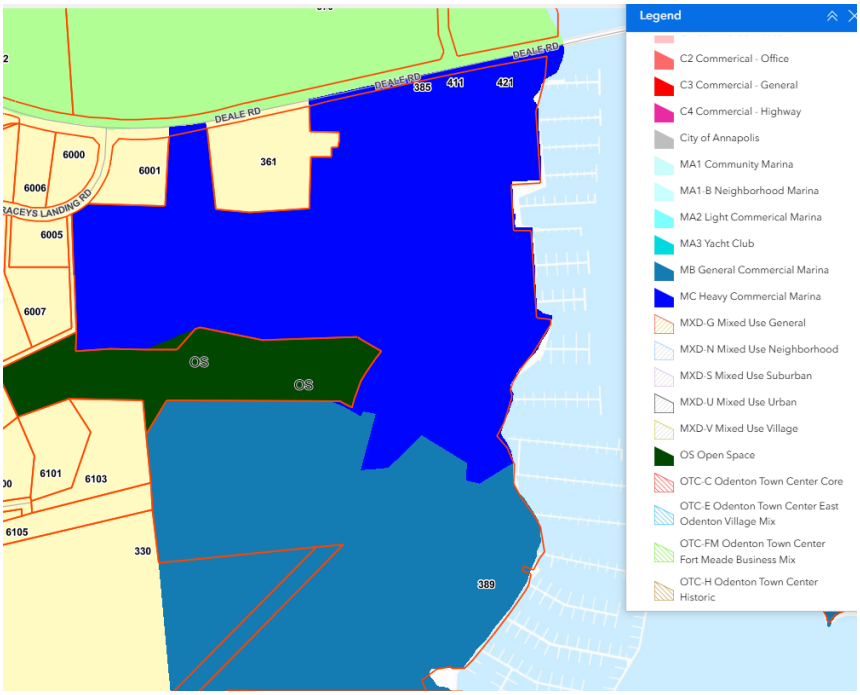
[2] Please note that approximately 3,267 square feet (0.075 acres) of Lot 1RR is outside of the critical area and not part of the Subject Property or this Application. This area is shaded in dark green on Sheet 3 of the Growth Allocation Plan Set and is labeled "Proposed 35' Landscape Buffer (Outside Critical Area)."

classification is inconsistent with the Subject Property's zoning. IDA will allow the Applicant to expand boat storage for the marina as described in detail herein.

Existing Critical Area classification:



Zoning Map for the Herrington Property:



The requested growth allocation is consistent with the overall goals and policies of the 2022 Master Plan for Water Supply and Sewerage Systems. The Subject Property is within the planned sewer service area and is not currently served by public sewer. Existing Lot 1R, improved with the marina, is located within an existing sewer service area with operating sewer service. Sewer service may be extended to the Subject Property, however, based on the proposed boat storage use, current plans do not include sewer extension as such use does not require sewer service.

County Sewer Service Category Map for existing Parcels 19 and 268:



While the Subject Property is within a planned sewer service area, it does not have access to public water. Public water service is not reasonably obtainable in this area due to the distance from existing water infrastructure and the lack of planned service extensions. This condition is consistent with development patterns in southern Anne Arundel County, where both residential and commercial uses have historically relied on private wells for potable water, with on-site storage tanks typically used to meet fire protection requirements. The County's 2022 Master Plan for Water Supply and Sewerage Systems supports the provision and extension of water services in alignment with the General Development Plan and designated service areas; however, this area is not identified for public water service. The proposed use, surface boat storage associated with an existing marina, represents a low water demand that can be adequately supported by the existing well and infrastructure already serving the site. Fire protection needs will be addressed through conventional storage tank design and the property's close proximity to the Chesapeake Bay, which provides a viable supplemental water source. Accordingly, the absence of public water service does not impede the proposed development and is consistent with both historical practices and County planning policy.

Property Background

Herrington Harbour North is a family-friendly marina and yachting center with a multigenerational commitment to preserving and protecting the environment. Herrington Harbour cares deeply about the natural environment, the surrounding community and all those that work, play and relax in and around the water. Herrington Harbour has a demonstrated record of environmental achievement through nearly five decades of developing and implementing best management practices and incorporating pioneering strategies.

Herrington Harbour was established in 1978. From the very beginning, when it was not nearly as popular as it is today, plans and improvements were made in harmony with nature. Clean water, clean air and clean soil were considered with every decision. Creating soft shorelines, planting wetlands, planting trees and adaptive reuse of the existing buildings have been foundational principles at Herrington Harbour. Herrington Harbour has created, enhanced, and maintained over 5 acres of tidal wetlands. Best management practices, including: bioretention areas, marsh creation areas, stream restorations, step pools and coastal plain outfalls have all been created to capture virtually all stormwater for filtering. Herrington Harbour North has also planted trees and understory comprising 6 acres or more of new forest in the RCA along the southern boundary of the Herrington Property. This forest will not be impacted by the requested growth allocation.

Herrington Harbour has a robust recycling program and has also led the maritime industry in the creation of the No Discharge Zone, first in Herring Bay and then throughout Anne Arundel County. Herrington Harbour has created habitats for natural pest control such as purple martins and have added low volume water fixtures for water conservation. Herrington Harbour has also created buffers around the shoreline by moving parking away from the shoreline and planting native trees, grass and bushes, a practice that Herrington Harbour North plans to continue upon the approval of this Application. In addition to its creation and restoration of over 5 acres of wetlands, Herrington Harbour North has completed 400 feet of stream restoration that outfalls into tidal waters. Herrington Harbour North has removed bulkheads replacing them with living shorelines. In the living shorelines Herrington Harbour North planted tidal wetlands *Spartina alterniflora, Spartina patens*, marsh hibiscus, as well as bayberry bush and other native plants to soften the shoreline and act as a filter and habitat for aquatic species. Herrington Harbour North has also created coastal plain outfalls with step pools and bioretention areas to further filter water before it reaches the tidal wetland areas created by Herrington Harbour North. The majority of these features are located on the RCA portion of the Herrington Property, a small portion is located within the existing IDA, these features will not be impacted by the requested growth allocation. Additionally, Herrington Harbour North has sponsored the planting of 1 million oysters in Herring Bay. Herrington Harbour also works with and supports numerous local organizations including, Chesapeake Bay Foundation, Chesapeake Bay Trust, Scenic Rivers Land Trust, Arundel Rivers Federation, Advocates for Herring Bay, and many others.

Herrington Harbour uses its weekly newsletter to promote natural resource initiatives and to educate the boaters on environmental topics. Herrington Harbour has been recognized both

nationally and regionally for being the best environmental marina. For over 20 years Herrington Harbour has been awarded the most environmental marina by the Chesapeake Bay Magazine. Herrington Harbour was a founding member of the Maryland State Clean Marina Program and was the first Clean Marina in Maryland. The Clean Marina Program certification is overseen by the Maryland State Department of Natural Resources ("DNR"). The DNR uses a certification worksheet with over 100 requirements to certify marinas. Marinas must be recertified every three years to remain in the program. Herrington Harbour North has remained in good standing since the inception of the program 25 years ago in 2001, a copy of the marina's most recent recertification for 2026 is attached hereto as ***Attachment 1***.

Beginning nearly 50 years ago, Herrington Harbour adopted a culture of preserving and protecting our fragile environment, setting high industry standards and preserving its rich historical context. While these decisions were sometimes more expensive and challenging than the alternative, Herrington Harbour is convinced that a natural setting, industry stewardship, community reinvestment, and a commitment to the past reflects its goal of a marina and yachting center that caters to those who would appreciate the importance of these objectives. Then and now, these assumptions have proven to be correct and this growth allocation Application will allow Herrington Harbour to further expand those ideals.

Application Requirements

The purpose of this Application is to facilitate the construction of improvements associated with the commercial marina facilities on the Subject Property. An IDA classification will allow Herrington Harbour to expand its surface boat storage farther from the shoreline and permit the renovation and re-purposing of certain structures and ancillary commercial marina facilities on the Herrington Property in order to enhance the marina's current operations and better serve the boating public and community. This project will provide expanded economic activity and employment opportunities in the area. This Application will further allow this family-owned marina to expand and better serve the community.

This Application contemplates a necessary expansion of an existing marina use in compliance with current stormwater management requirements. This Application is consistent with Plan2040, Anne Arundel County's Comprehensive Plan, supports the established character of the community, and provides suitable infill development while preserving community assets. This Application meets the growth allocation requirements of Natural Resources Article, Section 8-1808.1(c)(2) of the Maryland Code because it proposes to reclassify an existing RCA property that adjoins an existing IDA to IDA pursuant to §18-13-401 of the County Code. As further described below, existing Lot 1R, the current marina, is within a priority funding area as described in the State Finance and Procurement Article. The Subject Property is within the planned sewer service area and will become part of an IDA that exceeds 20 acres.

Plan2040

As discussed in Plan2040, continued development of the maritime industry is an opportunity to create and continue a healthy economy. Plan 2040 outlines several policies to promote and sustain the maritime industry and maritime trades. This Application will allow for the necessary expansion and improvement of Herrington Harbour North to further expand and enhance its existing operations. Economic activities associated with maritime uses, such as marinas, are critical to the employment and economic health of the County. Marina uses are unique in terms of employment requirements and serve to diversify the economy.

According to the National Oceanic and Atmospheric Administration's 2024 Marine Economy Report for Maryland[3], Maryland is ranked 8 out of 30 coastal states for marine employment and 9 out of 30 coastal states for GDP. Most importantly, the State's top county for both marine employment and GDP is Anne Arundel County. Anne Arundel County is home to 25% of Maryland's marine jobs and produces 43% of the marine economy's gross domestic product in Maryland per NOAA's Office for Coastal Management.

Herrington Harbour North employs 45 year-round and 20 employees seasonally. There are 21 onsite family owned and operated businesses representing 200 full time jobs. An additional 250 outside contractors work out of Herrington Harbour North, which represent another 200 full time jobs onsite. Herrington Harbour North supports nearly 500 full time jobs for local people. Over the last 10 years, Herrington Harbour North has increased the number of employees by 20%. The number of onsite businesses has increased by 40% and the existing businesses have expanded by 50%. The boating industry requires more expertise in maintenance and repair as boats are getting more sophisticated. As the technology on boats continues to evolve, so does the industry. This requires more workshops, land storage space, and investment in equipment and personnel. This Application enables Herrington Harbour to further expand its operations and these crucial initiatives.

Such improvements will support the County's policies and goals for the maritime industry as stated in Plan2040 Goal BE4.2, while specific to Peninsula Policy Areas, defines the County's goal as to "[e]nsure the maritime industry remains a viable driver of economic growth and stability…" While the Subject Property is not located within a Peninsula Policy Area, Herrington Harbour North is one of the largest marinas on the East Coast and is the largest marina in Anne Arundel County with 600 slips and land storage for over 1000 boats. Approximately 3,000 boaters and their families visit the marina each year.

This growth allocation also supports Goal HE2: "[a]ttract, retain, and expand upon the diversity of businesses and industries that will provide jobs, income and a tax base that is sustainable and meets

[3] NOAA Office for Coastal Management, 2024 Marine Economy Report Maryland, https://coast.noaa.gov/data/digitalcoast/pdf/marine-economy-maryland.pdf.

the needs of all residents"; and specifically HE2.6: "[p]romote and sustain commercial fishing and maritime trades." This Application promotes the Plan2040 land use, planning and policy goals. Boaters are drawn to Herrington Harbour North, and therefore Anne Arundel County, from all over the world. The concentration of talent for marine repair services, proximity to international airports and strategic location on the Chesapeake Bay make Herrington Harbour North ideal for boaters. The marina's customer base is far reaching including local (Anne Arundel County and surrounding counties of Maryland), regional (Virginia, Washington DC/Baltimore region), national (all parts of the US) and international members and visitors. Herrington Harbour North has customers from 46 states and 11 countries. The furthest customers hail from Australia.

County Code

Development in the IDA must also meet the following requirements pursuant to Code § 17-8-205, and pursuant to the Growth Allocation Plan Set prepared by Atwell, LLC, the below requirements have been met.

(1) All development in the IDA shall be subject to the habitat protection area criteria of COMAR, Title 27.
(2) Pollutant loadings from impervious surfaces shall be reduced at least 10% below the level of pollution from the site prior to development. This requirement shall be met by maximizing ESD design criteria. Offsets permitted by the design standards and technical report may be used either onsite or offsite in the same critical area watershed to reach 10% pollutant reduction requirements of this section after maximizing ESD design criteria. For disturbance less than 5,000 square feet, the methods specified in § 17-8-405 may be utilized.
(3) If practicable, permeable areas shall be established in vegetation.
(4) Proposed development shall use cluster development as a means to reduce lot coverage and maximize areas of vegetation.
(5) Buffer modification areas in the IDA are subject to such additional requirements as provided in Articles 17 and 18 of this Code.
(6) Lot coverage may not exceed the lot coverage limitations of the underlying zoning district.

The Application proposes to exceed the 15% afforestation requirement and seeks to plant 0.82 acres of forest, more than the required 0.71 acres pursuant to County Code §17-8-802. The proposed lot coverage is 64%, much less than the 80% maximum.

Maryland Natural Resources Article

Maryland Natural Resources Article §8-1808.1(c)(2)(vi) requires that growth allocation must be sited outside of areas vulnerable to climate change or incorporate approved measures that reduce vulnerability. The Critical Area Commission has issued interim guidance dated May 2025 titled "Incorporating New Requirements for Climate and Equity Into Local Growth Allocation Applications." The completed guidelines are attached hereto including Worksheet A, Growth

Allocation Coastal Resilience Evaluation and Worksheet B, Growth Allocation Site Evaluation for Equity.

The proposed IDA is outside of areas vulnerable to climate change. Pursuant to the attached Worksheet A, the proposed project is designed with a 50 year life expectancy and, conservatively, has a medium tolerance for flood risk. The impacts of flooding on the use are low given that moderate flooding is not likely to cause significant damage or disruption to the proposed boat storage use. Additionally, the Subject Property is not located within a flood risk area. The Subject Property plans for a rise in sea level of 2.65 feet by 2080, again this will not have significant impact on the proposed use.

The Subject Property will not be impacted by storm events or nuisance flooding over the course of its 50 year design life, and it is not located within the FEMA 100 or 500 year floodplain. It is important to note that the proposed project seeks to further limit Herrington Harbour's vulnerability to sea level rise as the growth allocation will allow for boat storage located closer to the shoreline, a much more vulnerable area, to be relocated to a less vulnerable area farther away from the shoreline. Only grading and paving is proposed on the Subject Property, no structures are proposed at this time. This Application will permit Herrington Harbour to further advance its environmental stewardship and conservation initiatives.

Pursuant to Worksheet B, the Subject Property is not located in an overburdened or underserved census tract. The Subject Property is not in an underserved tree canopy area (or near one). Further, the Subject Property's environmental justice score is 7.9, significantly lower than other waterfront areas throughout the County.

COMAR Requirements

The Critical Area Commission adopted regulations that organized the statutory requirements for growth allocation under COMAR 27.01.02.06-1 through .06-4, Requirements for New Intensely Developed Areas and Limited Development Areas. Regulation .06-1 specifies the required elements for an application for growth allocation in order to be accepted by the Commission. Pursuant to COMAR 27.01.02.06-2, the Environmental Report completed by Holly Oak Consulting, LLC analyzed all applicable requirements which include items such as a buffer management plan, measures for soil erosion and sediment control, including implementation strategy, and calculations of forest, woodland, and vegetative areas. Please see the Environmental Report included with this submission for more information.

The amount of proposed growth allocation, 4.762 acres, is accurate and equal to the amount of growth allocation to be deducted from Anne Arundel County's existing total allotment of growth allocation. It is our understanding that the County has more than 4.762 acres available for IDA reclassification.

COMAR 27.01.02.06-3 describes the requirements for New Intensely Developed Areas.

E. A local jurisdiction shall use the following standards when locating new intensely developed areas or limited development areas:

(1) Locate a new intensely developed area in a limited development area or adjacent to an existing intensely developed area;

This request reclassifies an existing 4.762 acre RCA classified portion of the Herrington Property that adjoins an existing IDA of 49.18 acres. The proposed total IDA on Lot 1RR is 53.94 acres.

(2) Locate a new limited development area adjacent to an existing limited development area or an intensely developed area;

Not applicable.

(3) Locate in a manner that:
(a) Minimizes impacts to a habitat protection area as defined in COMAR 27.01.01.01;

Pursuant to Section 4 of the Environmental Report, the Subject Property does not contain steep slopes, rare, threatened or endangered species, or forest interior dwelling species. Further, a wetland delineation of the Subject Property was completed in January 2026 and the nearest non-tidal wetlands and stream to the Subject Property were surveyed by Atwell, LLC in February 2026. This Application will not impact to the non-tidal wetlands, stream, or their respective buffers. Please see the Environmental Report for more information.

(b) Optimizes benefits to water quality; and

As described in both the Environmental Report and the Growth Allocation Coastal Resilience Evaluation and Growth Allocation Site Evaluation for Equity, this Application optimizes benefits to water quality. As stated throughout this letter, approval of this Application will allow Herrington Harbour to relocate existing boat storage farther from the shoreline and replace those areas with native vegetation. The Application meets all applicable water quality requirements including 10% phosphorous removal.

Environmental mapping was conducted at the Subject Property prior to layout. Natural areas and stream, wetland, and shoreline buffers were reserved. Natural flow paths were maintained, building layout was fingerprinted to reduce clearing and grading on the Subject Property. Site grading promoted sheetflow from impervious area to pervious ones, site design was evaluated to reduce creation of needless impervious cover and maximize disconnection of impervious cover. Site design was also evaluated for to identify potential hotspot generations areas for

stormwater treatment and erosion and sediment control practices were integrated into the plan.

(c) Minimizes impacts to the defined land uses of the resource conservation area;

This Application seeks reclassification of RCA to IDA consistent with the Subject Property's MB zoning. A 35-foot landscape buffer will separate the remaining RCA and the proposed IDA as shown on Sheet 3 of the Growth Allocation Plan Set. The Application minimizes impact to the defined uses of the resource conservation area and will further promote such uses on the adjacent RCA located on Parcel 19R.

(4) Locate a new intensely developed area or limited development area in a resource conservation area at least 300 feet beyond the landward boundary of tidal wetlands or tidal waters, unless the local jurisdiction proposes, and the Commission approves, alternative measures for enhancement of water quality and habitat that provide greater benefits to the resources; and

The Subject Property is more than 300 feet beyond the landward boundary of tidal wetland or tidal waters.

(5) For a growth allocation application for a residential subdivision, comply with the requirements and procedures under Environment Article, § 9-206, Annotated Code of Maryland, and Land Use Article, Title 1, Subtitle 5, and § 5-104, Annotated Code of Maryland.

Not applicable.

Pursuant to COMAR 27.01.02.06-3 - Requirements for New Intensely Developed Areas and Limited Development:

G. When reviewing a map amendment or refinement involving the use of growth allocation, the Commission shall consider the following factors:

(1) Consistency with the jurisdiction's adopted comprehensive plan and whether the growth allocation would implement the goals and objectives of the adopted plan;

This Application supports County Economic Development objectives of promoting business and employment opportunities in southern Anne Arundel County and enhances existing and ongoing efforts to increase water access and increased opportunities for residents to appreciate waterfront and water dependent recreation. The Application is consistent with the Plan 2040 designated Land Use of "Maritime" and 2017 Existing Land Use of "Marina".

Additionally, during the Anne Arundel County's most recent comprehensive zoning process the Subject Property was rezoned to MB, and this Application is consistent with such zoning.

(2) For a new intensely developed area, whether the development will:

(a) Be served by a public wastewater system;

As explained above, the Subject Property is within the planned sewer service area but is not currently served by public sewer. The majority of Lot 1RR (formerly known as Parcel 89) is located within an existing sewer service area with operating sewer service. Sewer service may be extended to the Subject Property, however, based on the proposed boat storage use, current plans do not include sewer extension as such use does not require sewer service.

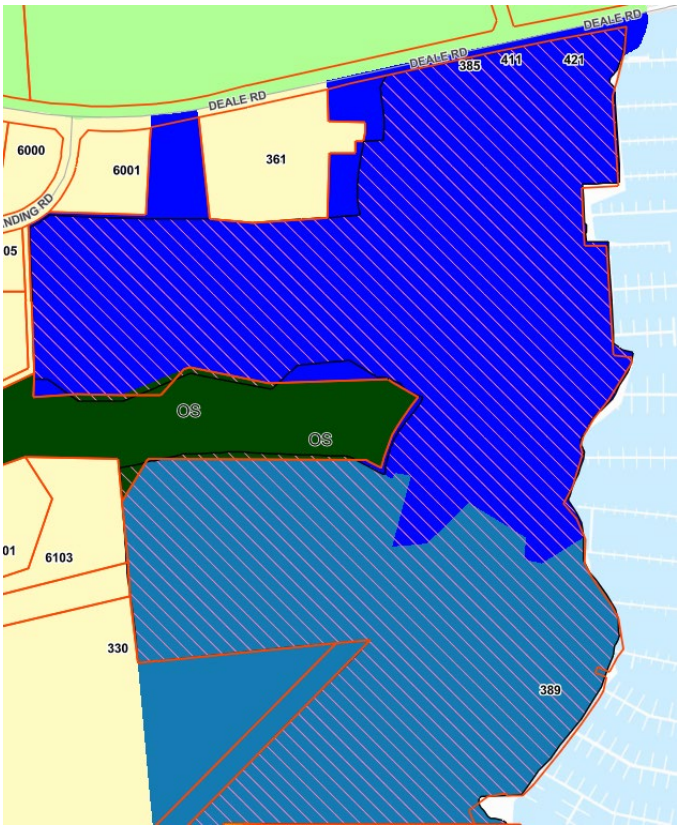
(b) Have an allowed average density of at least 3.5 units per acre, as calculated under State Finance and Procurement Article, § 5-7 B-03(h), Annotated Code of Maryland;

This standard is not applicable because it is not a residential development project.

(c) For a new intensely developed area that is greater than 20 acres, be located in a priority funding area; and

This factor is not applicable as the new intensely development area is less than 20 acres. The Subject Property is 4.762 acres. The majority of Lot 1RR is situated within an existing priority funding area and the Subject Property immediately adjoins the PFA as shown below. The total intensely developed area proposed including the Subject Property is 53.94 acres as shown on Sheet 2 of the Growth Allocation Plan Set.

The Priority Funding Area is shaded below:



(d) Have a demonstrable economic benefit to the area;

The proposed intensely developed area will result in an expanded tax base, increased employment opportunities in southern Anne Arundel County, and increased opportunities for residents to recreate within the County and expend recreation dollars in the County. Additionally, the proposed intensely developed area will promote and advance opportunities for existing and new secondary and tertiary businesses that depend upon marinas and marina-related activities.

According to the Maryland Department of Natural Resources, the outdoor recreation industry provides a $10.6 billion impact on Maryland's economy.[4] *The*

[4] Maryland Department of Natural Resources, *Outdoor Recreation Industry Provides $10.6 Billion Impact on Maryland Economy*, March 17, 2026, "The figures from the bureau show that Maryland's outdoor recreation economy is growing faster than the national average. The sector's contribution to the gross domestic product of Maryland increased 5.6% between 2023 and 2024, compared to 4% nationally." https://news.maryland.gov/dnr/2026/03/17/outdoor-recreation-industry-provides-10-6-billion-impact-on-maryland-economy/.

industry's impact on Anne Arundel County's economy cannot be understated. The Anne Arundel County Economic Development Corporation commissioned Sage Policy Group, Inc. to analyze the maritime industry's impact on the County in July 2020 entitled "The Maritime Industry as a Driver of Economic Recovery & Middle-Class Formation in Anne Arundel County, MD[5]" The report states, "[w]hen properly defined, the maritime industry directly supports nearly 5,700 jobs and more than $274 million in employee compensation/annum in Anne Arundel County. Once multiplier effects are considered, Anne Arundel County's maritime industry supports an estimated 8,600 jobs, $416 million in annual employee compensation, and nearly $1.2 billion in annual economic activity."

As previously described, Herrington Harbour North supports nearly 500 full time jobs, over the last 10 years, Herrington Harbour North has increased the number of employees by 20% and the number of onsite businesses have increased by 40% while existing business have expanded by 50%.

Further, the report lists an enormous $96 million in annual expenditures by recreational boaters in the County. As described above, boaters are drawn to Herrington Harbour North from all over the world. The concentration of talent for marine repair services, proximity to international airports, and location on the Chesapeake Bay make it ideal for boaters. Herrington Harbour North has customers from 46 states and 11 countries.

The report also emphasizes the tax revenue the industry creates, citing to higher resident incomes and property values that provide the County with additional tax receipts and supports approximately $1.2 billion in economic activity countywide each year. Pages 4 and 25 of the report state, "Sage estimates that maritime activities support $8.7 million in County income tax collections each year and more than $8 million in real property tax collections from marinas alone."

(4) The use of existing public infrastructure, where practical;

The Subject Property will utilize the marina's existing entrance on Deale Road, a public road maintained by the State. As stated above, the Subject Property is not currently served by public water or sewer. While the Subject Property is within a planned sewer service area, sewer service is not necessary for the proposed boat storage use but may be extended in the future. The proposed use represents a low water demand that can be adequately supported by the existing

[5] *The Maritime Industry as a Driver of Economic Recovery & Middle-Class Formation in Anne Arundel County, MD*, July 2020, https://www.aaedc.org/wp-content/uploads/2021/02/Sage_AAEDC_Maritime_Final.pdf.

well and infrastructure already serving the site. Fire protection needs will be addressed through conventional storage tank design and the Subject Property's close proximity to the Chesapeake Bay, which provides a viable supplemental water source. Adequacy of public facilities will be evaluated during the County's site development review process and will be in compliance with all applicable County regulations.

(5) Consistency with State and regional environmental protection policies concerning the protection of threatened and endangered species, and species in need of conservation that may be located on-site or off-site;

The proposed project will advance conservation objectives or will be outcome neutral.

(6) Impacts on a priority preservation area, as defined under Agriculture Article, § 2-518, Annotated Code of Maryland;

The proposed growth allocation will have no impact upon the County's ongoing Priority Preservation program.

(7) Environmental impacts associated with wastewater and stormwater management practices and wastewater and stormwater discharges to tidal waters, tidal wetlands, and tributary streams; and

The proposed project will be outcome neutral for wastewater management priorities and will have a net positive impact upon stormwater discharge into tidal watercourses.

As explained above, Herrington Harbour North continues to go to great lengths to provide environmental stewardship. Herrington Harbour North led the way in the creation of the No Discharge Zone in Herring Bay in 2000 and more recently for all of Anne Arundel County in 2021.

(8) Environmental impacts associated with location in a coastal hazard area or an increased risk of severe flooding attributable to the proposed development.

The proposed project will have no measurable deleterious impacts upon coastal hazards and will not result in increased flood damage impacts.

Importantly, the proposed growth allocation will allow Herrington Harbour to move existing boat storage further from the shoreline to the Subject

Property. This will allow Herrington Harbour to replace the existing storage areas with greenspaces filled with native vegetation, in furtherance of Herrington Harbour's sustainability initiatives as described herein.

Conclusion

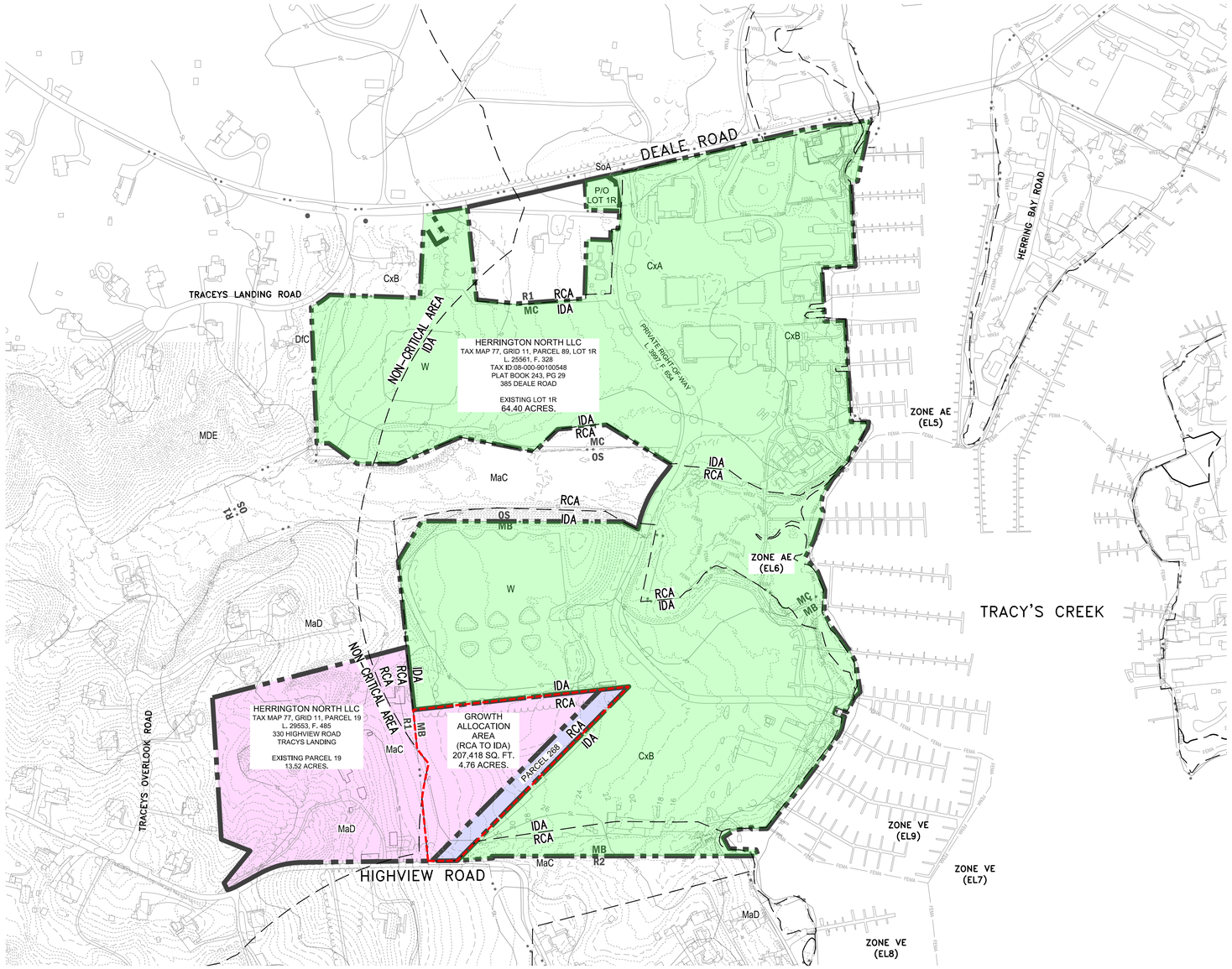
Approval of this Application will provide a demonstrable economic benefit to the surrounding area. The 4.762 acres of IDA for boat storage will allow the Herrington Harbour North Marina to expand and create employment and revenue opportunities that will benefit Anne Arundel County. The marina operation imposes minimal costs on County infrastructure and resources as it requires no additional school or road capacity and utilizes minimal public services while generating economic activity and tax revenues. It is fair and appropriate to grant Herrington Harbour North's growth allocation request as it will facilitate the improvement and expansion of the marina and will accommodate growth and economic activity consistent with Plan2040 and sound planning principles. Approval of this Application will help ensure that the maritime industry remains a viable driver of economic growth and stability in Anne Arundel County.

Thank you for your consideration of our Application. Please reach out to me directly with any questions regarding our Application at 443-569-0795 or ebenson@yvslaw.com.

Very truly yours,

YVS LAW, LLC

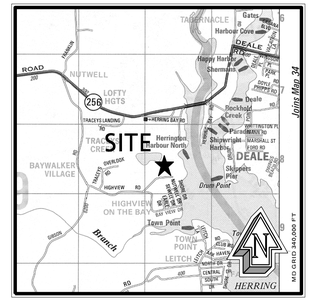
Erin K. Benson



EXISTING CONDITIONS GROWTH ALLOCATION PLAN

0 200 400 600 800

GRAPHIC SCALE
SCALE: 1"=200'



VICINITY MAP

SCALE: 1"=2000'

© ADC THE MAP PEOPLE PERMITTED USE NO. 08301200

GENERAL NOTES

1. OWNER / DEVELOPER
   HERRINGTON NORTH LLC
   PO BOX 40
   TRACYS LANDING 20779

   ENGINEER
   ATWELL, LLC.
   175 ADMIRAL COCHRANE DR, SUITE 302
   ANNAPOLIS, MARYLAND 21401
   410-897-9290

2. THE PROPERIES ARE KNOWN AS:
   TAX MAP 77, GRID 11, PARCEL 89, LOT 1R; DEED 25561 / 328
   TAX ACCOUNT NO. 08-000-90100548
   385 DEALE ROAD

   TAX MAP 77, GRID 17, PARCEL 268; DEED 29553 / 485
   TAX ACCOUNT NO. 08-00-90063027

   TAX MAP 77, GRID 11 PARCEL 19; DEED 29553 / 485
   TAX ACCOUNT NO. 08-000-01108800
   330 HIGHVIEW ROAD

3. CRITICAL AREA DESIGNATION: RCA (RESOURCE CONSERVATION AREA) AND IDA (INTENSELY DEVELOPED AREA.

4. THE EXISTING TOPOGRAPHY AND FEATURES SHOWN HEREON WERE TAKEN FROM COUNTY GIS INFORMATION AND SUPPLEMENTED WITH SURVEY INFORMATION BY ATWELL, LLC.

5. THE SITES ARE LOCATED WITHIN THE CHESAPEAKE BAY CRITICAL AREAS DESIGNATION (RCA & IDA).

6. THE PROPERTY DESCRIBED HEREON IS LOCATED IN THE FLOOD HAZARD ZONE X (AREAS OF MINIMAL FLOODING AND ZONE AE (EL.6) AND 0.2% ANNUAL CHANCE FLOOD ZONE AS DELINEATED ON THE FIRM FLOOD INSURANCE MAP #24003C0314F DATED FEBRUARY 18, 2015 FOR SAID COUNTY AND DISTRIBUTED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY.

7. GENERAL DESCRIPTION OF PREDOMINATE SOIL TYPE AS SHOWN ON USDA NATURAL RESOURCES CONSERVATION SERVICE MAP, (WEB SOIL SURVEY)
   CxB; CUMBERSTONE-MATTAPEX COMPLEX, 2 TO 5 PERCENT SLOPES

SHEET LIST

EXISTING CONDITIONS	...1 OF 3
CRITICAL AREA EXHIBIT	...2 OF 3
PROPOSED CONDITIONS	...3 OF 3

SITE TABULATION

LOT 1R:

1.	TOTAL SITE AREA:	2,805,145 SQ.FT.± OR 64.40 ACRES.
2.	EXISTING RCA:	307,469 SQ.FT.± OR 7.06 ACRES.
3.	EXISTING IDA:	2,142,265 SQ.FT.± OR 49.18 ACRES.
4.	TOTAL MB ZONING:	1,184,676 SQ.FT.± OR 27.20 ACRES.
5.	TOTAL MC ZONING:	1,620,469 SQ.FT.± OR 37.20 ACRES.
6.	EXISTING LOT COVERAGE IS:	1,781,433 SQ. FT. OR 40.90 ACRES.
7.	TOTAL LOT COVERAGE:	1,781,433 SQ. FT. OR 40.90 ACRES
8.	EXISTING WOODLAND:	27,247 SQ.FT.± OR 0.63 ACRES.

LOT 1R

PARCEL 268:

1.	TOTAL SITE AREA:	54,876 SQ.FT.± OR 1.26 ACRES.
2.	EXISTING RCA:	54,876 SQ.FT.± OR 1.26 ACRES.
3.	EXISTING IDA:	0 SQ.FT.± OR 0 ACRES.
4.	TOTAL MB ZONING:	54,876 SQ.FT.± OR 1.26 ACRES.
5.	EXISTING LOT COVERAGE IS:	0 SQ. FT. OR 0 ACRES.
6.	EXISTING WOODLAND:	3,028 SQ.FT.± OR 0.07 ACRES.

PARCEL 268

PARCEL 19:

1.	TOTAL SITE AREA:	589,056 SQ.FT.± OR 13.52 ACRES.
2.	EXISTING RCA:	189,084 SQ.FT.± OR 4.34 ACRES.
3.	EXISTING IDA:	0 SQ.FT.± OR 0 ACRES.
4.	TOTAL MB ZONING:	162,845 SQ.FT.± OR 3.74 ACRES.
5.	TOTAL R1 ZONING:	428,211 SQ.FT.± OR 9.78 ACRES.
6.	EXISTING LOT COVERAGE IS:	18,520 SQ. FT. OR 0.43 ACRES.
7.	EXISTING WOODLAND:	170,156 SQ.FT.± OR 3.91 ACRES.

PARCEL 19

LEGEND

- GROWTH ALLOCATION RECLASSIFICATION (RCA->IDA) 4.76 ACRES.
- PROPERTY LINE / RIGHT-OF-WAY
- EXISTING CONTOUR (208)
- EXISTING ZONING DESIGNATION (MB)
- EXISTING WOODSLINE
- CRITICAL AREA LINE (IDA / RCA)
- SOIL TYPE (MaC)
- SOIL LINE (SL)
- FEMA FLOOD ZONE (FEMA)
- LOT 1R
- PARCEL 268
- PARCEL 19

SOIL TABLE OF PARCEL 268, 19, & LOT 1R

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
CxA	Cumberstone-Mattapex complex, 0 to 2 percent slopes	C/D	16.0	20.2%
CxB	Cumberstone-Mattapex complex, 2 to 5 percent slopes	C/D	26.2	33.1%
DfC	Dodon very fine sandy loam, 5 to 10 percent slopes	C	1.0	1.3%
MaC	Marr-Dodon complex, 5 to 10 percent slopes	C	19.0	24.0%
MaD	Marr-Dodon complex, 10 to 15 percent slopes	C	6.5	8.2%
SoA	Shadyoak-Elkton complex, 0 to 2 percent slopes	B/D	0.7	0.9%
W	Water		9.7	12.3%
Totals for Area of Interest			**79.2**	**100.0%**

Revisions

Rev. #	By	Date	Description

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410.897.3200

Date MAY, 2026
Job Number 24008009
Scale AS SHOWN
Drawn By JLS
Approved By T. MARTIN
Folder Reference HERRINGTON HARBOUR

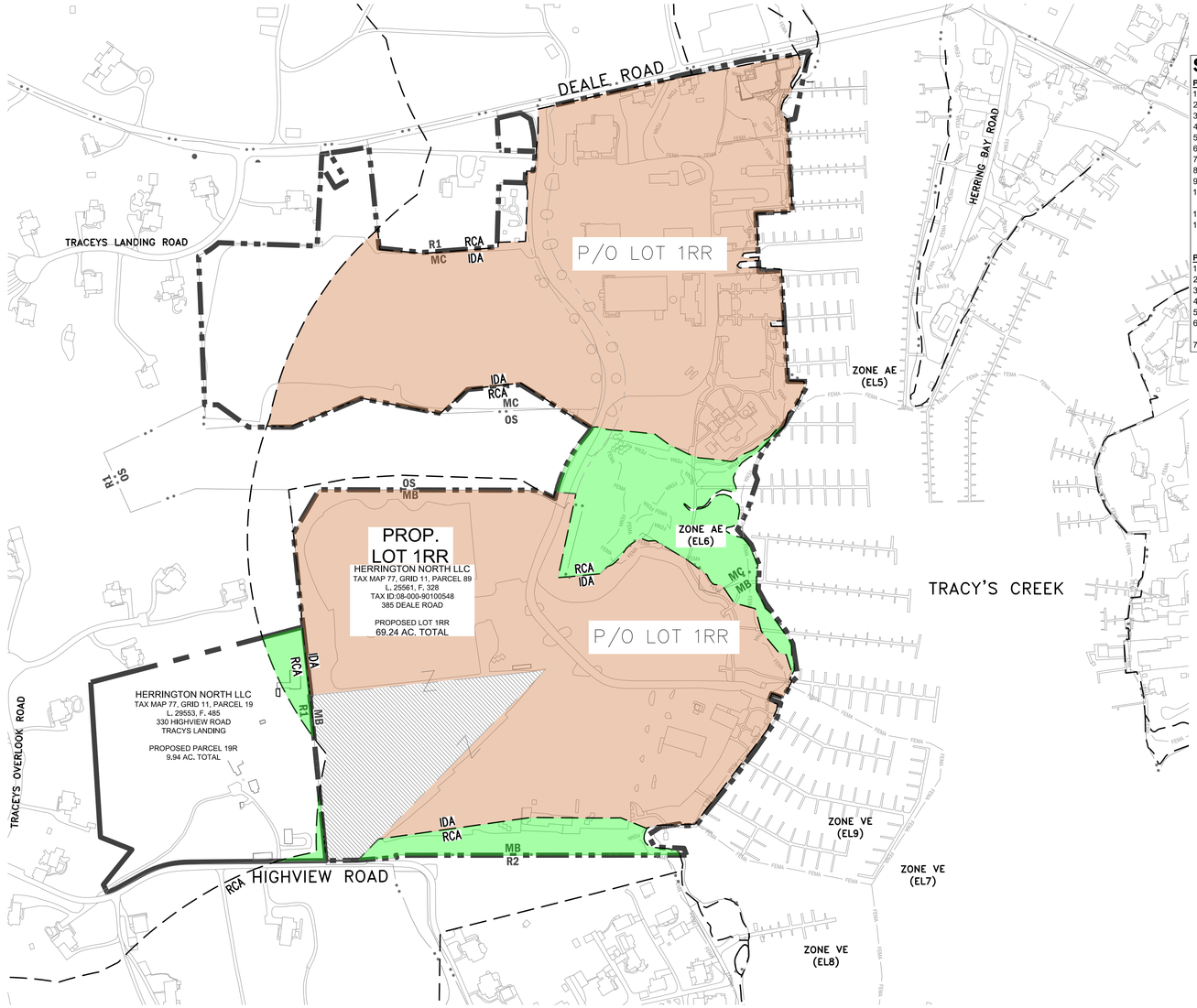
EXISTING CONDITIONS
THE LANDS OF
HERRINGTON NORTH LLC
385 DEALE ROAD
TRACY'S LANDING , MARYLAND 20779
TAX ACC. #08-000-90100548 DEED REF 25561 / 328
TAX MAP 77, GRID 11, PARCEL 89
8TH DISTRICT ANNE ARUNDEL COUNTY

Sheet No. 1 OF 3

PLOTTED: Jun 11, 2026 - 8:10am

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BASIS OF BEARING:
MARYLAND STATE PLANE
(NAD83/2011 ADJUSTMENT)



GROWTH ALLOCATION PLAN

0 200 400 600 800

GRAPHIC SCALE
SCALE: 1"=200'

SITE TABULATION

PROP. LOT 1RR:

1.	TOTAL SITE AREA:	3,016,040 SQ. FT.± OR 69.24 ACRES.
2.	PROPOSED AREA TO REMAIN RCA:	307,469 SQ.FT.± OR 7.06 ACRES.
3.	PROPOSED AREA TO REMAIN IDA:	2,142,265 SQ.FT.±OR 49.18 ACRES.
4.	PROPOSED RECLASSIFICATION OF RCA TO IDA:	207,419 SQ.FT.±OR 4.76 ACRES.
5.	PROPOSED TOTAL IDA:	2,349,684 SQ.FT.±OR 53.94 ACRES.
6.	MB ZONING:	1,395,361 SQ.FT.± OR 32.03 ACRES.
7.	MC ZONING:	1,620,679 SQ.FT.± OR 37.21 ACRES.
8.	EXISTING LOT COVERAGE:	1,781,433 SQ. FT. OR 40.90 ACRES.
9.	PROPOSED LOT COVERAGE:	1,933,597 SQ. FT. OR 44.39 ACRES.
10.	TOTAL LOT COVERAGE:	1,933,597 SQ. FT. OR 44.39 ACRES. - (64% OF SITE AREA)
11.	EXISTING WOODLAND:	48,796 SQ.FT.± OR 1.12 ACRES.
12.	MAXIMUM COVERAGE BY STRUCTURES, PARKING, AND DRY STORAGE (80%): AACO ZONING PER 18-7-106	2,412,832 SQ.FT.± OR 55.39 ACRES.

PROP. PARCEL 19R:

1.	TOTAL SITE AREA:	433,037 SQ. FT.± OR 9.94 ACRES.
2.	EXISTING RCA TO REMAIN:	30,061 SQ.FT.± OR 0.69 ACRES.
3.	TOTAL R1 ZONING:	433,037 SQ. FT.± OR 9.94 ACRES
4.	EXISTING LOT COVERAGE:	18,520 SQ. FT. OR 0.43 ACRES.
5.	PROPOSED LOT COVERAGE:	18,520 SQ. FT. OR 0.43 ACRES.
6.	TOTAL LOT COVERAGE:	18,520 SQ. FT. OR 0.43 ACRES. - (4% OF SITE AREA)
7.	EXISTING WOODLAND:	151,635 SQ.FT.± OR 3.48 ACRES.

LEGEND

- PROPERTY LINE / RIGHT-OF-WAY
- EXISTING ZONING DESIGNATION: MB
- CRITICAL AREA LINE: IDA / RCA
- SOIL TYPE: MaC
- FEMA FLOOD ZONE: FEMA
- EXST. PROP BOUNDRY T.B.R
- EXST. IDA CRITICAL AREA
- EXST. RCA CRITICAL AREA
- GROWTH ALLOCATION RECLASSIFICATION (RCA->IDA) PROP. IDA: 4.76 ACRES.

Revisions

Rev. #	By	Date	Description

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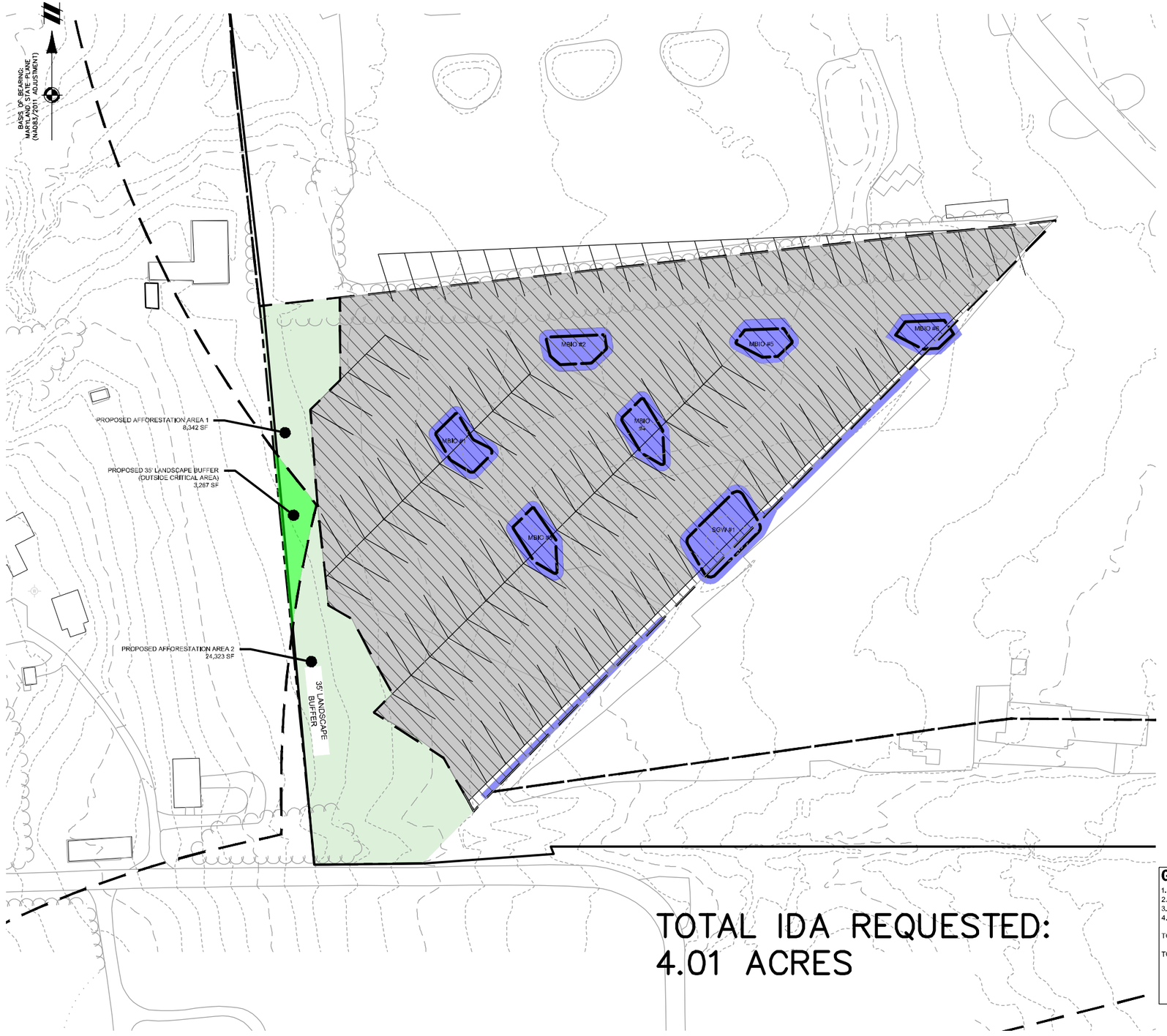
Date MAY, 2026
Job Number 24008009
Scale AS SHOWN
Drawn By JLS
Approved By T. MARTIN
Folder Reference HERRINGTON HARBOUR

CRITICAL AREA EXHIBIT
THE LANDS OF
HERRINGTON NORTH LLC
385 DEALE ROAD
TRACY'S LANDING , MARYLAND 20779
TAX ACC. #08-000-90100548 DEED REF 25561 / 328
TAX MAP 77, GRID 11, PARCEL 89
8TH DISTRICT ANNE ARUNDEL COUNTY

Sheet No. 2 OF 3

PLOTTED: Jun 11, 2026 - 8:10am

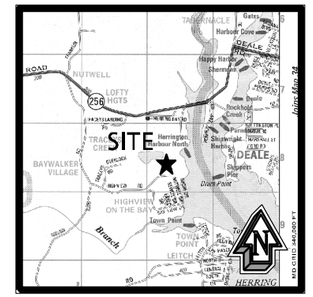
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TOTAL IDA REQUESTED:
4.01 ACRES

EXISTING CONDITIONS GROWTH ALLOCATION PLAN

0 100 200 300 400
GRAPHIC SCALE
SCALE: 1"=100'



VICINITY MAP

SCALE: 1"=2000'

© ADC THE MAP PEOPLE PERMITTED USE NO. 08301200

GENERAL NOTES

1. OWNER / DEVELOPER
HERRINGTON NORTH LLC
PO BOX 40
TRACYS LANDING 20779

ENGINEER
ATWELL, LLC.
2661 RIVA ROAD, BUILDING 900
ANNAPOLIS, MARYLAND 21401
410-897-9290

2. THE PROPERTY IS KNOWN AS:
TAX MAP 77, GRID 11, PARCEL 89; DEED 25561 / 328
TAX ACCOUNT NO. 08-000-90100548
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7. GENERAL DESCRIPTION OF PREDOMINATE SOIL TYPE AS SHOWN ON USDA NATURAL RESOURCES CONSERVATION SERVICE MAP.
CxB, CUMBERSTONE-MATTAPEX COMPLEX, 2 TO 5 PERCENT SLOPES

LEGEND

PROPOSED LOT COVERAGE (BOAT STORAGE AREA)

PROPOSED AFFORESTATION AREA (15% REQUIRED) AACO (17-8-802)

35' LANDSCAPE BUFFER (OUTSIDE CRITICAL AREA)

PROPOSED SWM STRUCTURES

PROPOSED GROWTH ALLOCATION RECLASSIFICATION (RCA>>IDA)

CRITICAL AREA LINE — IDA — RCA

GROWTH ALLOCATION AREA:

1.	LANDSCAPE BUFFER OUTSIDE THE CRITICAL AREA:	3,267 SF
2.	REFORESTATION AREA 1:	8,342 SF
3.	REFORESTATION AREA 2:	24,323 SF
4.	TOTAL FORESTED AREA (TO REMAIN RCA / OUTSIDE CA):	35,932 SF OR 0.82 ACRES
TOTAL ADDITIONAL SITE AREA:		210,685 SF OR 4.83 ACRES
SUBTRACTED BY PROPOSED RCA TO REMAIN / OUTSIDE CA		35,932 SF OR 0.82 ACRES
TOTAL AREA TO BE RECLASSIFIED TO IDA:		174,753 SF OR 4.01 ACRES

Revisions

Rev. #	By	Date	Description

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ANNAPOLIS, MARYLAND 21401
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GROWTH ALLOCATION PROPOSED LAYOUT

THE LANDS OF

HERRINGTON NORTH LLC
385 DEALE ROAD
TRACY'S LANDING, MARYLAND 20779
TAX ACC. #08-000-90100548 DEED REF 25561 / 328
TAX MAP 77, GRID 11, PARCEL 89
8TH DISTRICT ANNE ARUNDEL COUNTY

Date	NOVEMBER, 2026
Job Number	24008009
Scale	AS SHOWN
Drawn By	JCM
Approved By	T. MARTIN
Folder Reference	HERRINGTON HARBOUR

Sheet No. 3 OF 3

PLOTTED: Nov 18, 2026 - 12:03pm

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