YVS LAW LLC

Erin K. Benson ✧ 443-569-0795 ✧ ebenson@yvslaw.com

July 29, 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")
Rhode River Marina
Tax Map 60, Grid 21, Parcels 250 and 275 and Tax Map 60, Grid 22, Parcels 508 and 269 along Germantown Road, Edgewater, Maryland 21037 (the "Property")

Dear Ms. Seay:

This firm represents Marina Property Management LLC and 3920, LLC (collectively, "Marina Property Management" or the "Applicant"), the owners of property known and designated as Tax Map 60, Grid 21, Parcels 250 and 275 and Tax Map 60, Grid 22, Parcel 269, along Germantown Road, Edgewater, Maryland 21037. The property owned by Marina Property Management subject to this Application consists of approximately 7.77 acres, the majority of which is known and operated as Rhode River Marina. This growth allocation application also includes a 0.70 acre portion of property owned by Barbara A. Pearson, such property is known and designated as Tax Map 60, Grid 22, Parcel 508 with a street address of 3926 Germantown Road. A letter of authorization signed by Mrs. Pearson is attached hereto as ***Attachment 1***. The properties referenced above are collectively referred to as the "Property" for purposes of this Application. Marina Property Management and Mrs. Pearson respectfully request to reclassify a total of 8.47 acres of Limited Development Area ("LDA") to Intensely Developed Area ("IDA") for the expansion of the marina's boat storage capacity and construction of improvements in order to support the marina's current operations and better serve the boating community.

The entirety of the Property is currently classified as LDA. The Property is split zoned General Commercial Marina District ("MB"), MA2 – Light Commercial Marina ("MA2"), and Residential District ("R2"). Due to the split zoning of the Property, the portions of the Property zoned R2 are excluded from this request. This Application only relates to the portion of the Property zoned MB and MA2, currently the entirety of Parcel 250 and portions of Parcels 269, 275, and 508 (the "Subject Property"). The reclassification of the Subject Property from LDA to IDA aligns with the Subject Property's commercial marina zoning designation and is consistent with the zoning district's allowable uses. The Application will allow this family owned marina to update and enhance its operations to better cater to the greater Mayo/Edgewater community, sales and service customers, and marina members. Rhode River Marina has a rich 85-year history of dedication to boaters, respect for the Chesapeake Bay and its tributaries, and responsibility to the environment, this Application will further support this family's efforts.

Existing Property

The Property is currently improved with several uses. Existing uses include a commercial marina, fuel dock, parking, boat storage, full-service repair and warranty facility, parts store, show room, and residential homes. The majority of Marina Property Management's property has been used historically for a commercial marina since before 1952. The Property is also within a buffer modification area.

Parcel 250 (Marina Property Management) consists of approximately 5.14 acres and is entirely zoned MB – General Commercial Marina District and classified as LDA.

Parcel 269 (Marina Property Management) consists of approximately 0.84 acres and is split zoned R2 – Low Density Residential and MA2 – Light Commercial Marina. The MA2 zoned portion of Parcel 269 consists of approximately 0.68 acres and is classified as LDA.

Parcel 275 (Marina Property Management) consists of approximately 2.58 acres and is split zoned R2 – Low Density Residential and MA2 – Light Commercial Marina. The MA2 zoned portion of Parcel 275 consists of approximately 1.94 acres and is classified as LDA.

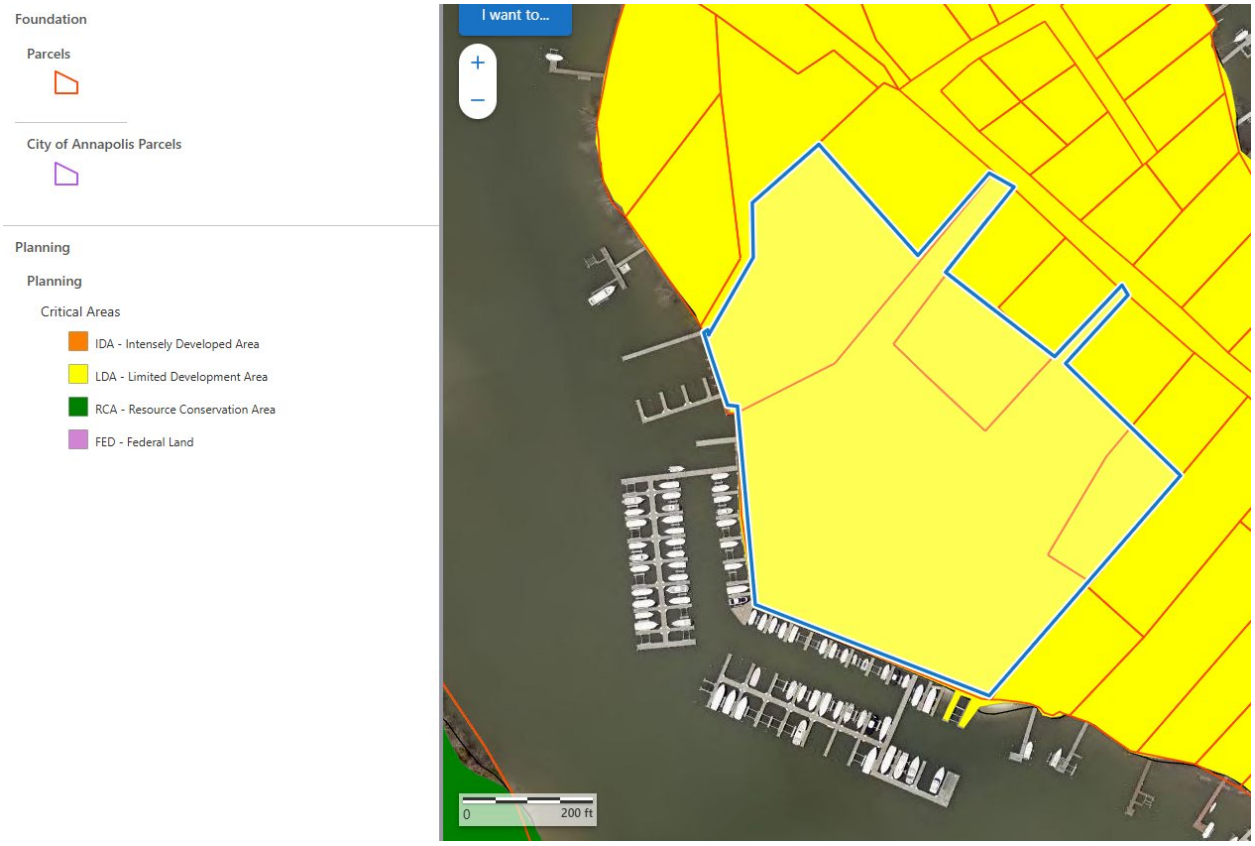
Parcel 508 (Pearson) consists of approximately 1.03 acres and is split zoned R2 – Low Density Residential and MA2 – Light Commercial Marina. The MA2 zoned portion of Parcel 508 consists of approximately 0.70 acres and is classified as LDA.

Marina Property Management and Mrs. Pearson respectfully seek reclassification to IDA for all classified land that is zoned MB and MA2, approximately 8.47 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 marina district zoning. IDA will allow the Applicant to expand its boat storage and allow for the construction of a new showroom for the marina as described in detail herein.

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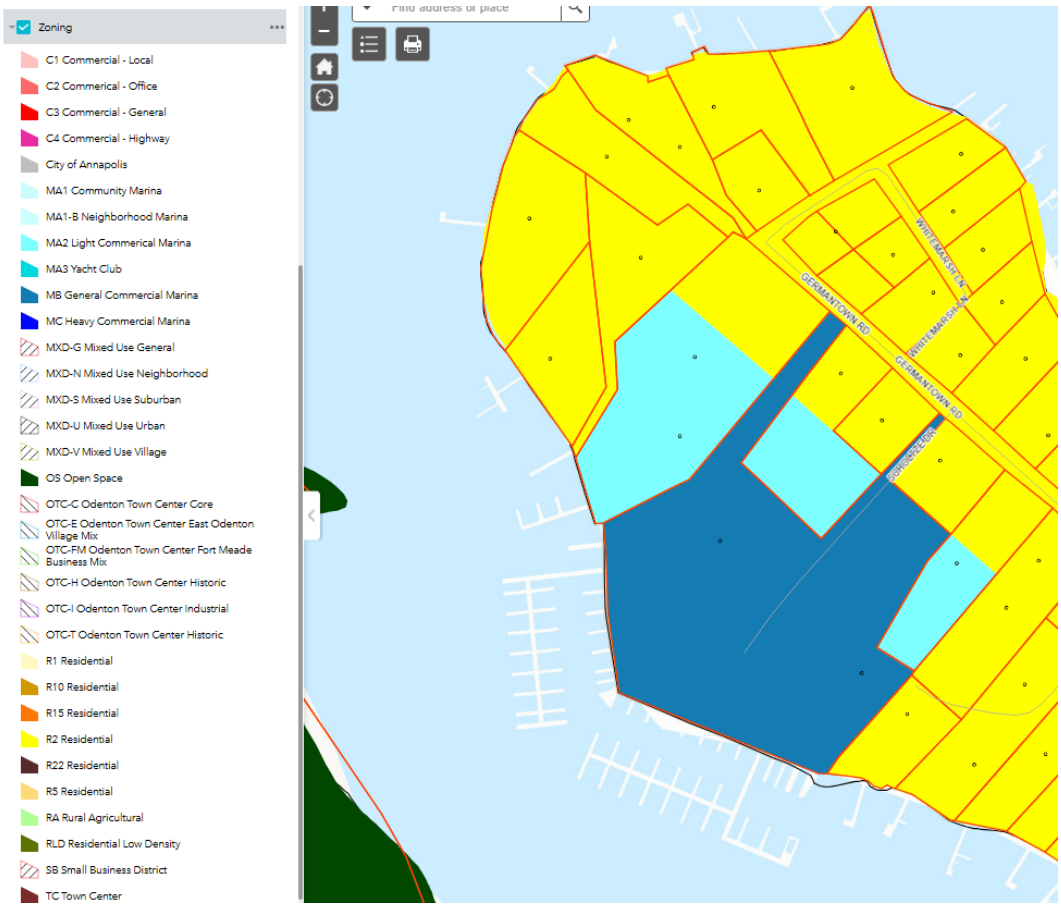
Existing Critical Area classification for the Property:



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Zoning Map for the 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 located in an existing sewer service area with existing sewer service to each of the individual parcels. The Subject Property 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, relocation of the showroom and 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 Subject Property's close proximity to Whitemarsh Creek

and the Rhode River, which provide a viable supplemental water source. The absence of public water service does not impede the proposed development and is consistent the 2022 Water and Sewer Master Plan.

Marina Property Management's Pending Modification Application

Pursuant to Marina Property Management's modification application (MOD-2026-0123)[1], Marina Property Management proposes to amend the lot lines of its three existing parcels (Parcels 250, 269, and 275) in order to consolidate the portions of Parcels 269 and 275 which are zoned MA2, consisting of a combined 2.62 acres, into what is currently known and designated as Parcel 250. The resulting lot, Proposed Lot 1 as shown on Sheet 2 entitled Growth Allocation Reclassification of the Growth Allocation Plan Set, will consist of approximately 7.77 acres.

If Marina Property Management's modification request is approved and an amended plat recorded, this will result in reconfiguration of the three existing parcels. Parcel 250 will increase to approximately 7.77 acres by adding 0.68 acre from Parcel 269 and 1.94 acres from Parcel 275 (Proposed Lot 1).[2] The resulting property boundaries will align with the marina district zoning line but the number of parcels (3) will not change.

Property History

Brian Conner, owner of Marina Property Management, leased and operated the Rhode River Marina beginning in 1982 and has owned the Property since 1997. Prior to Marina Property Management's purchase, the Property was owned by the Behlke family, who emigrated from Germany in 1900. The marina has grown over the last 85 years and is a staple in the community and beyond on account of its location minutes from the Chesapeake Bay and easy accessibility by water or land from Annapolis, Baltimore, Washington DC, and Virginia.

Rhode River has been a certified clean marina since 2005. The Clean Marina Program certification is overseen by the Maryland Department of Natural Resources ("DNR"). Brian Conner participated in the development of the Clean Marina Program. The DNR uses a certification worksheet with over 100 requirements to certify marinas, DNR estimates that only 30% of Maryland's marinas are certified as Clean Marinas or Clean Marina Partners. Marinas must be recertified every three years to remain in the program. Rhode River Marina proudly utilizes several

[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 June 22, 2026 (MOD-2026-0123). If approved, the amended plat will align the property line of Lot 1 with the MB and MA2 zoning district lines. This growth allocation request is applicable to the entirety of Proposed Lot 1 as well as the 0.70 acre portion of Parcel 508 owned by Mrs. Barbara Pearson. Upon modification approval and amended plat recordation, Lot 1 shall consist of approximately 7.77 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 three lots pursuant to the modification request.

[2] The modification request shows Proposed Lot 1 as consisting of 7.76 acres, this is a rounding error that will be rectified during the amended plat process to match the 7.77 acres requested pursuant to this Application for the Marina Property Management property.

clean marina practices including: oil recycling, clean boat sanding and pressure washing protocols, filters and containment protection on gas tanks serving the fuel dock, buffers on pier bulkhead to assist with stormwater management, and a pumpout station. A copy of the marina's most recent recertification for 2026 is attached hereto as ***Attachment 2***.

Similar to Marina Property Management's recent rezoning of certain residentially zoned land to MA2, the Pearson property was also split zoned during the County's recent comprehensive rezoning process. This rezoning resulted in approximately 0.30 acres of the Pearson property being rezoned from MA2 to R2 and the remaining 0.70 acres retaining the MA2 zoning. The Pearson property is currently improved with a single-family dwelling. Approval of this Application will allow Mrs. Pearson to continue to reside in her family home on the R2 zoned portion of the parcel while also planning for the future expansion of boat storage space within the MA2 zoned portion of the parcel (0.70 acres) as shown on Sheet 3 of the Growth Allocation Plan Set.

Application Requirements

The purpose of this Application is to facilitate the expansion of a sophisticated family owned commercial marina facility. The expansion will help enhance the marina's current operations and better serve the boating public and community. As stated above, Marina Property Management has applied for a modification to process an amended plat, such amended plat will reconfigure the lot lines to conform with the zoning district lines and further allow for necessary improvements to the Subject Property to improve marina operations. This project will support increased economic activity and create additional employment opportunities in the area while enabling the marina's expansion within a long-standing location that has been specifically planned and zoned to support growth and economic development in the County.

This Application contemplates an expansion and redevelopment of an existing marina use in compliance with current stormwater management requirements, is consistent with Plan2040, supports the established character of the community, and provides suitable infill development and the preservation of 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 LDA property to IDA pursuant to §18-13-401(c) of the County Code.

Pursuant to §18-13-401(c), IDA may be located in an area of less than 20 acres if the IDA designation would:

> (1) allow for the redevelopment of existing commercial use in compliance with current stormwater management requirements;
> (2) allow for land use consistent with the County's General Development Plan; and
> (3) support the established character of the community, provide for suitable infill development, and provide for the preservation of existing community assets.

Plan2040 designates the majority of the Subject Property as Maritime planned land use. The County later updated its mapping in 2025 to include "GDP Planned Land Use Amended June 2025." This update revised the planned land use classification for land zoned MA2 District or MB District as Maritime planned land use. This Application is consistent with the Subject Property's Plan2040 land use classification. As described above, the Subject Property is also located in an existing sewer service area with existing sewer service to each of the individual parcels. Therefore, the requested rezoning is consistent with the overall goals and policies of the 2022 Water and Sewer Master Plan.

As discussed in Plan2040, continued development of the maritime industry is an opportunity to create and continue a healthy economy. Plan2040 outlines several policies to promote and sustain the maritime industry and maritime trades. Plan2040 outlines several policies to promote and sustain the maritime industry and maritime trades. The Subject Property is located within both a Peninsula Policy Area and a Priority Funding Area.

This growth allocation Application will allow for the necessary renovation and improvement of the Rhode River Marina to further expand and enhance its existing operations. Such improvements will support the County's policies and goals for the maritime industry, goal BE4, "[s]upport quality of life and economic vitality in County Peninsula Policy Areas, while preserving environmentally sensitive areas," and BE4.2, "[e]nsure the maritime industry remains a viable driver of economic growth and stability in Peninsula Policy Areas." This Application 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 the needs of all residents"; and specifically HE2.6: "[p]romote and sustain commercial fishing and maritime trades."

Due to Rhode River's prime location and accessibility to the Chesapeake Bay and many of its attractions in Anne Arundel County, southern Maryland, and the Eastern Shore, the marina attracts boaters from all over the region. Not only does Rhode River Marina's unique and central location give customers convenient access but customers are able to experience a full day of boating on the Rhode and West Rivers, this is one of the many reasons the marina continues to reach capacity and consistently maintains a waitlist that spans several years. The Rhode River is known as a hurricane hole and safe haven for boaters, Rhode River Marina has had customers from all over the world travel to Anne Arundel County just to experience this area by boat. Additionally, the Rhode River Marina ready access to the incredible 2,650 acre Smithsonian Environmental Research Center, an environmental research and educational facility operated by the Smithsonian Institution. This demonstrates the marina's sustained demand for additional slips and marina services and is an example of the strong market demand for boating access and marina services in Anne Arundel County. This Application promotes the Plan2040 land use, planning and policy goals.

This Application supports the established character of the community and preserves existing community assets. Brian Conner, owner of Marina Property Management, leased and operated the Rhode River Marina for over forty years and has owned the Property since 1997. Approval of this Application will allow this long-standing, family owned operation to strengthen and expand its

services while continuing to serve residents of Anne Arundel County and beyond. Reclassification to IDA will enable this family owned business to expand in a manner consistent with the County's planning objectives, strengthen its long-term economic viability, enhance access to the County's maritime industry, and continue providing high-quality marina services to its members and visitors.

County Code

Development in the IDA must also meet the requirements of Code § 17-8-205. As set forth in 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. Pursuant to County Code § 17-8-802, Marina Property Management must provide afforestation of 1.17 acres on Proposed Lot 1 as shown on Sheet 3 of the attached Site Plan. Marina Property Management seeks to plant or retain 1.34 acres of forest, 0.17 acres more than required. The proposed lot coverage on Proposed Lot 1 is 66%, much less than the 80% maximum. As for the Pearson owned portion of the Subject Property, Parcel 508, the proposed afforestation again exceeds the requirement pursuant to County Code § 17-8-802 at 6,209 square feet rather than the required 4,584 square feet (one tenth of an acre). The proposed lot coverage on Parcel 508 is 54%.

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 and showroom 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 is not within the relative sea level rise projections for the Annapolis area. 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 or a Special Flood Hazard Area. The growth allocation request is not likely to experience sea level rise over the life expectancy of the project based on all available data.

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 significantly lower than other 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. The project includes required landscaping, afforestation, vegetated buffer areas, and stormwater management. Please see the Environmental Report included with this submission for more information.

The amount of proposed growth allocation, 8.47 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 8.47 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 8.47 acre limited development area to intensely developed area.

(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 5 of the Environmental Report, the Subject Property does not contain steep slopes, rare, threatened or endangered species, or forest interior dwelling species. Further, neither wetlands nor streams are present on site. 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. Approval of this Application will allow the Applicant to increase native vegetation on site. The Application meets all applicable water quality requirements including 10% phosphorus removal.

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

This Application seeks reclassification of LDA to IDA consistent with the Subject Property's MB and MA2 zoning.

(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

Not applicable.

(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's 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 GDP Planned Land Use Amended June 2025 of "Maritime" as well as the Subject Property's location within a Priority Funding Area and the County's Peninsula Development Policy Area. Additionally, during Anne Arundel County's most recent comprehensive zoning process portions of the Subject Property were rezoned from R2 to MA2, 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;

The Subject Property is currently served by public sewer.

(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 proposed new intensely developed area (8.47 acres) is less than 20 acres. The Subject Property is within a Priority Funding Area.

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

The proposed development will expand the County's tax base, create additional employment opportunities in the Mayo/Edgewater community, and provide both residents and visitors with increased opportunities to recreate and spend recreation-related dollars within Anne Arundel County.

According to the Maryland Department of Natural Resources, the outdoor recreation industry provides a $10.6 billion impact on Maryland's economy.[3] *The 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*[4]*." 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." The report also lists an enormous $96 million in annual expenditures by recreational boaters in the County.*

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

[3] 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/.

[4] *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.

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."

(3) *Not applicable – request is for new intensely developed area.*

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

The Subject Property will utilize the marina's existing entrance on Germantown Road, a public road maintained by the County. The Subject Property is currently served by public sewer and private wells. The proposed use 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 Subject Property's close proximity to the waters of the Chesapeake Bay, which provide 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.

(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 deleterious impacts upon coastal hazards and will not result in increased flood damage impacts.

Conclusion

Approval of this Application will generate meaningful and demonstrable economic benefits for the surrounding community and Anne Arundel County as a whole. 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. The 8.47 acres of IDA for boat storage and the construction of improvements ancillary to the existing marina will allow the Rhode River Marina to enhance its operations and create additional employment and revenue-generating opportunities that will benefit Anne Arundel County and its citizens. Continued investment in the maritime industry presents an important opportunity to support a strong and sustainable local economy. Approval of this growth allocation Application will facilitate the renovations and improvements necessary for the marina to enhance its existing operations while at the same time advancing the County's planning objectives and the beneficial impact of the maritime industry on the 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

Attachment 1

ATWELL

AUTHORIZATION

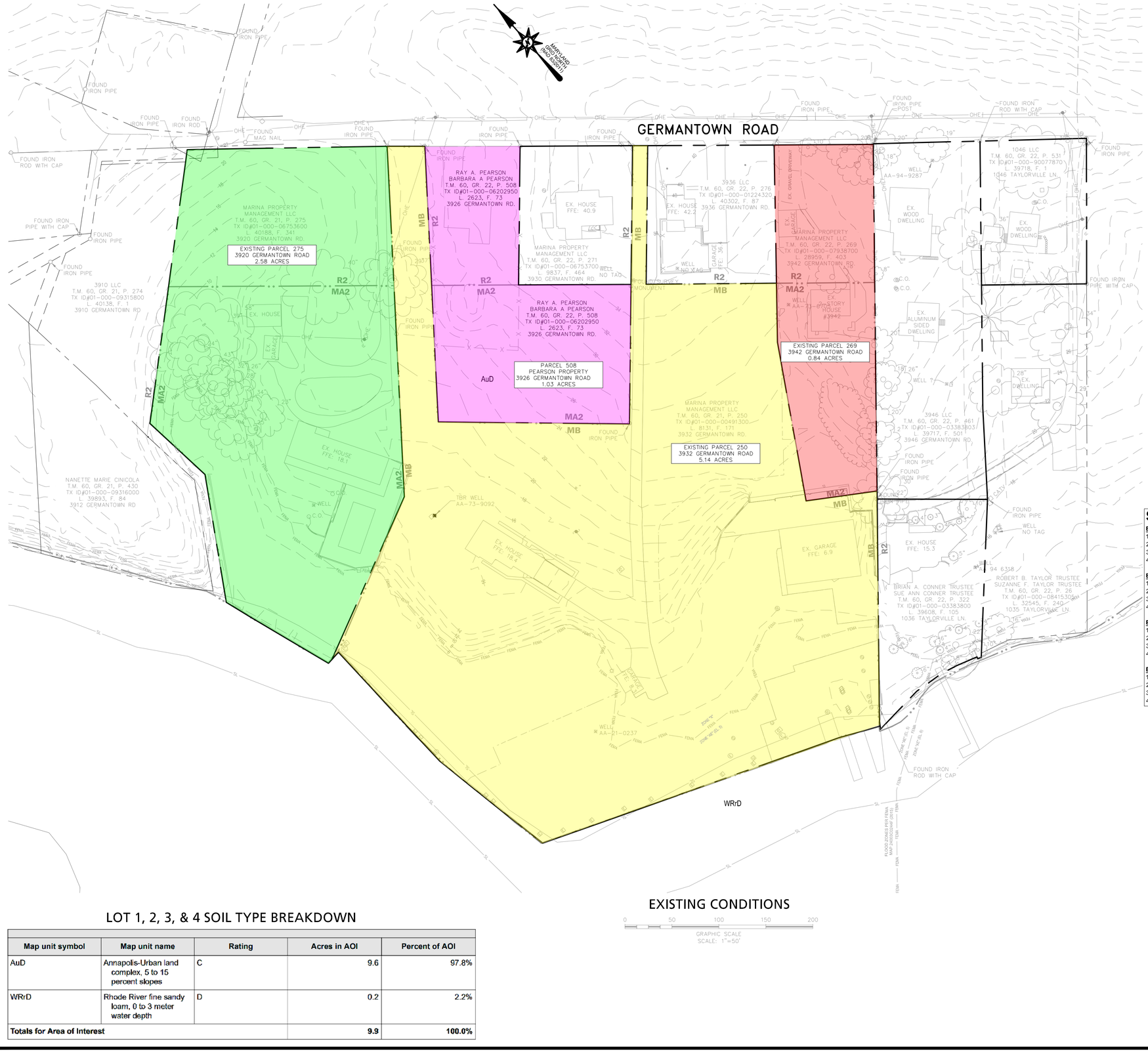
I hereby authorize Atwell, LLC and the firm of YVS Law, LLC to file a growth allocation request and to reclassify the Critical Area designation of my property located at 3926 Germantown Road, Edgewater, Maryland, Tax ID 01-000-06202950, from a Limited Development Area (LDA) to an Intensely Developed Area (IDA). I am the sole owner of the property, as the surviving tenant by the entirety.

BARBARA A. PEARSON

Barbara A. Pearson

Date: March 25, 2026

2661 Riva Rd Building 800, Annapolis, MD 21401
www.atwell.com



EXISTING CONDITIONS

0 50 100 150 200

GRAPHIC SCALE
SCALE: 1"=50'



VICINITY MAP

SCALE: 1"=2000'

© ADC THE MAP PEOPLE PERMITTED USE NO. 08301200

GENERAL NOTES

1. OWNER / DEVELOPER
   MARINA PROPERTY MANAGEMENT LLC
   3932 GERMANTOWN ROAD
   EDGEWATER MD 21037

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

2. THE PROPERTIES ARE KNOWN AS:
   TAX MAP 60, GRID 21, PARCEL 250; DEED 8131 / 171 (MARINA PROPERTY MANAGEMENT)
   TAX ACCOUNT NO. 01-000-00491300
   3932 GERMANTOWN ROAD

   TAX MAP 60, GRID 22, PARCEL 269; DEED 28959 / 403 (MARINA PROPERTY MANAGEMENT)
   TAX ACCOUNT NO. 01-000-07938700
   3942 GERMANTOWN ROAD

   TAX MAP 60, GRID 21, PARCEL 275; DEED 40188 / 341 (MARINA PROPERTY MANAGEMENT)
   TAX ACCOUNT NO. 01-000-06753600
   3920 GERMANTOWN ROAD

   TAX MAP 60, GRID 22, PARCEL 508; DEED 2623 / 73 (RAY A. PEARSON)
   TAX ACCOUNT NO. 01-000-06202950
   3926 GERMANTOWN ROAD

3. CRITICAL AREA DESIGNATION: LDA (LIMITED DEVELOPMENT 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 (LDA). 25' BUFFER MODIFICATION AREA PER 17-8-705.

6. THE PROPERTY DESCRIBED HEREON IS LOCATED IN THE FLOOD HAZARD ZONE X (AREAS OF MINIMAL FLOODING AND ZONE AE (EL 5) AS DELINEATED ON THE FIRM FLOOD INSURANCE MAP #24003C0244F 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.
   AuD; ANNAPOLIS-URBAN LAND COMPLEX, 5 TO 15 PERCENT SLOPES

SITE TABULATION

EXISTING PARCEL 269:

1.	TOTAL SITE AREA:	36,590 SQ. FT.± OR 0.84 ACRES.
2.	EXISTING LDA:	36,590 SQ. FT.± OR 0.84 ACRES.
3.	EXISTING LOT COVERAGE IS:	5,526 SQ. FT. OR 0.13 ACRES.
4.	TOTAL LOT COVERAGE:	5,526 SQ. FT. OR 0.13 ACRES. (15% OF SITE AREA)

EXISTING PARCEL 250:

1.	TOTAL SITE AREA:	223,855 SQ. FT.± OR 5.14 ACRES.
2.	EXISTING LDA:	223,855 SQ. FT.± OR 5.14 ACRES.
3.	EXISTING LOT COVERAGE IS:	158,175 SQ. FT. OR 3.63 ACRES.
4.	TOTAL LOT COVERAGE:	158,175 SQ. FT. OR 3.63 ACRES. (70% OF SITE AREA)

EXISTING PARCEL 275:

1.	TOTAL SITE AREA:	112,431 SQ. FT.± OR 2.58 ACRES.
2.	EXISTING LDA:	112,431 SQ. FT.± OR 2.58 ACRES.
3.	EXISTING LOT COVERAGE IS:	19,379 SQ. FT. OR 0.45 ACRES.
4.	TOTAL LOT COVERAGE:	19,379 SQ. FT. OR 0.45 ACRES. (17% OF SITE AREA)

EXISTING PARCEL 508:

1.	TOTAL SITE AREA:	44,884 SQ. FT.± OR 1.03 ACRES.
2.	EXISTING LDA:	44,884 SQ. FT.± OR 1.03 ACRES.
3.	EXISTING LOT COVERAGE IS:	3,463 SQ. FT. OR 0.08 ACRES.
4.	TOTAL LOT COVERAGE:	3,463 SQ. FT. OR 0.08 ACRES. (8% OF SITE AREA)

LEGEND

- PROPERTY LINE / RIGHT-OF-WAY
- EXISTING CONTOUR MINOR — 208 —
- EXISTING CONTOUR MAJOR — 208 —
- EXISTING ZONING DESIGNATION — MB
- EXISTING WOODSLINE
- EXISTING PARCEL 269 AREA
- EXISTING PARCEL 250 AREA
- EXISTING PARCEL 275 AREA
- EXISTING PARCEL 508 AREA
- FEMA FLOOD ZONE — FEMA — FEMA — FEMA — FEMA —
- SOIL TYPE — AuD
- SOIL BOUNDRY — SL —
- 100FT CRITICAL AREA BUFFER — CAB — CAB —

LOT 1, 2, 3, & 4 SOIL TYPE BREAKDOWN

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
AuD	Annapolis-Urban land complex, 5 to 15 percent slopes	C	9.6	97.8%
WRrD	Rhode River fine sandy loam, 0 to 3 meter water depth	D	0.2	2.2%
Totals for Area of Interest			**9.9**	**100.0%**

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Revisions

Rev. #	By	Date	Description

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Timothy J. Martin — 5/04/26 Date
License No. 10989 — Exp./Renewal Date 8/3/2026

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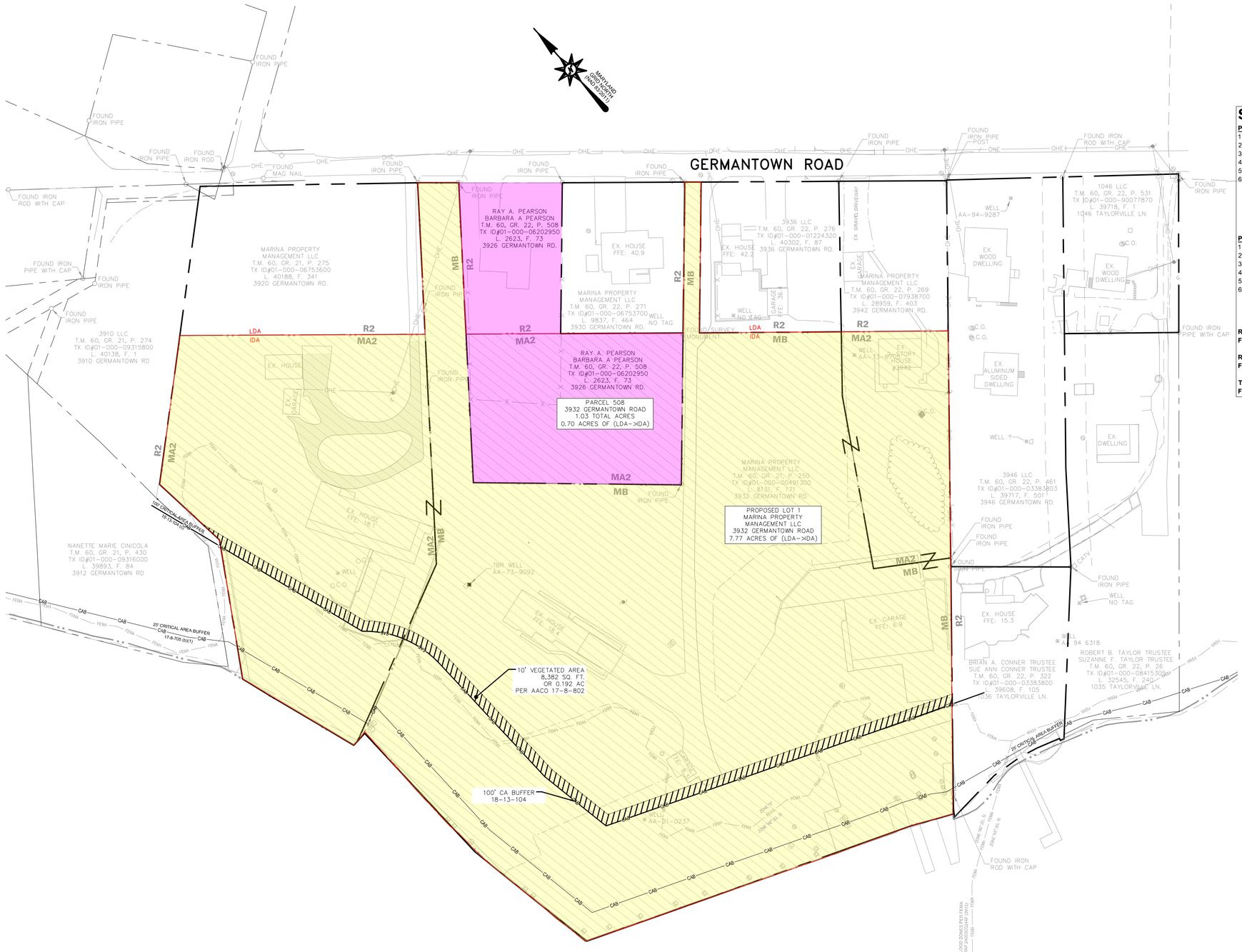
Date JUNE, 2026
Job Number 24001133
Scale AS SHOWN
Drawn By JCM
Approved By T. MARTIN
Folder Reference CONNER MARINA

EXISTING CONDITIONS

RHODE RIVER MARINA
CERTIFIED CLEAN MARINA
MDE DISCHARGE PERMIT 10-MA (02MA9205)
3932 GERMANTOWN ROAD
EDGEWATER , MARYLAND 21037
TAX ACC.: #01-000-00491300 DEED REF 8131 / 171
TAX MAP 60, GRID 21, PARCEL 250
1ST DISTRICT ANNE ARUNDEL COUNTY ZONED MB&MA2 / LDA

Sheet No. 1 OF 3

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SITE TABULATION

PROPOSED LOT 1 (MARINA PROPERTY MANAGEMENT LLC):

1.	TOTAL SITE AREA:	338,320 SQ. FT.± OR 7.77 ACRES.
2.	EXISTING LDA:	338,320 SQ. FT.± OR 7.77 ACRES.
3.	PROPOSED RECLASSIFICATION TO IDA:	338,320 SQ. FT.± OR 7.77 ACRES.
4.	EXISTING LOT COVERAGE IS:	180,598 SQ. FT.± OR 4.15 ACRES.
5.	TOTAL LOT COVERAGE:	180,598 SQ. FT.± OR 4.15 ACRES. (49% OF SITE AREA)
6.	REQUIRED 10' VEGETATED AREA: AACO (17-8-802)	8,382 SQ. FT.± OR 0.19 ACRES.

PROPOSED PARCEL 250R AREA

PROPOSED GROWTH ALLOCATION PART OF PARCEL 508 (BARBARA A. PEARSON):

1.	TOTAL SITE AREA:	44,884 SQ. FT.± OR 1.03 ACRES.
2.	EXISTING LDA:	44,884 SQ. FT.± OR 1.03 ACRES.
3.	PROPOSED LDA TO REMAIN:	14,319 SQ. FT.± OR 0.33 ACRES.
4.	PROPOSED RECLASSIFICATION TO IDA:	30,565 SQ. FT.± OR 0.70 ACRES
5.	EXISTING LOT COVERAGE:	3,560 SQ. FT.± OR 0.08 ACRES.
6.	TOTAL LOT COVERAGE:	3,560 SQ. FT.± OR 0.08 ACRES. (8% OF SITE AREA)

PARCEL 508 AREA

REQUESTED GROWTH ALLOCATION RECLASSIFICATION (MARINA PROPERTY MANAGEMENT) FROM LDA TO IDA: 338,320 SQ.FT.± OR 7.77 ACRES.

REQUESTED GROWTH ALLOCATION RECLASSIFICATION PARCEL 508 (BARBARA A. PEARSON) FROM LDA TO IDA: 30,565 SQ.FT.± OR 0.70 ACRES.

TOTAL REQUESTED GROWTH ALLOCATION RECLASSIFICATION FROM LDA TO IDA: 368,885 SQ.FT.± OR 8.47 ACRES.

LEGEND

- PROPERTY LINE / RIGHT-OF-WAY
- REMOVED PROPERTY LINE
- EXISTING CONTOUR MINOR (208)
- EXISTING CONTOUR MAJOR (208)
- EXISTING ZONING DESIGNATION (MB)
- EXISTING WOODSLINE
- PROPOSED PARCEL LOT 1 AREA
- PARCEL 508 AREA
- PROPOSED IDA CRITICAL AREA (LDA ->IDA) (368,885 SQ. FT. OR 8.47 ACRES.)
- CRITICAL AREA LINE (IDA / LDA)
- FEMA FLOOD ZONE
- 100' CRITICAL AREA BUFFER (CAB)
- 25' CRITICAL AREA BUFFER PER 17-8-705 (2) (CAB)

PROPOSED GROWTH ALLOCATION RECLASSIFICATION

0 50 100 150 200

GRAPHIC SCALE
SCALE: 1"=50'

PLOTTED: Jul 27, 2026 - 2:28pm

Revisions

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Date JUNE, 2026
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Scale AS SHOWN
Drawn By JCM
Approved By T. MARTIN
Folder Reference CONNER MARINA

GROWTH ALLOCATION RECLASSIFICATION

RHODE RIVER MARINA
CERTIFIED CLEAN MARINA
MDE DISCHARGE PERMIT 10-MA (02MA9205)
3932 GERMANTOWN ROAD
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TAX ACC. #01-000-00491300 DEED REF 8131 / 171
TAX MAP 60, GRID 21, PARCEL 250
1ST DISTRICT ANNE ARUNDEL COUNTY ZONED MB&MA2 / LDA

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SITE TABULATION

PROPOSED PARCEL LOT 1 (MARINA PROPERTY MANAGEMENT LLC):

1.	TOTAL SITE AREA:	338,320 SQ. FT.± OR 7.77 ACRES.
2.	EXISTING LDA:	338,320 SQ. FT.± OR 7.77 ACRES.
3.	PROPOSED RECLASSIFICATION TO IDA:	338,320 SQ. FT.± OR 7.77 ACRES.
4.	EXISTING LOT COVERAGE:	180,598 SQ. FT. OR 4.15 ACRES.
5.	PROPOSED LOT COVERAGE:	223,009 SQ. FT. OR 5.12 ACRES.
6.	TOTAL LOT COVERAGE:	223,009 SQ. FT. OR 5.12 ACRES. (66% OF SITE AREA)
7.	LIMIT OF DISTURBANCE:	305,275 SQ. FT. OR 7.01 ACRES.
8.	MAXIMUM COVERAGE BY STRUCTURES...	
...PARKING, AND DRY STORAGE (80%):		291,279 SQ. FT.± OR 6.69 ACRES.
	AACO ZONING PER 18-7-106	

PARCEL 508 GROWTH ALLOCATION (BARBARA A. PEARSON):

1.	TOTAL SITE AREA:	44,884 SQ. FT.± OR 1.03 ACRES.
2.	EXISTING LDA:	44,884 SQ. FT.± OR 1.03 ACRES.
3.	PROPOSED LDA TO REMAIN:	14,319 SQ. FT.± OR 0.33 ACRES.
4.	PROPOSED RECLASSIFICATION TO IDA:	30,565 SQ. FT.± OR 0.70 ACRES.
5.	EXISTING LOT COVERAGE:	3,560 SQ. FT.± OR 0.08 ACRES.
6.	PROPOSED LOT COVERAGE:	16,143 SQ. FT.± OR 0.37 ACRES.
7.	TOTAL LOT COVERAGE:	23,344 SQ. FT.± OR 0.54 ACRES. (54% OF SITE AREA)
8.	MAXIMUM ALLOWABLE COVERAGE BY STRUCTURES...	
...PARKING, AND DRY STORAGE (80%):		34,848 SQ. FT.± OR 0.80 ACRES.
	AACO ZONING PER 18-7-106	

TOTAL REQUESTED GROWTH ALLOCATION RECLASSIFICATION FROM LDA TO IDA: 368,885 SQ.FT.± OR 8.47 ACRES.

GROWTH ALLOCATION PLANTING TABULATIONS

PROPOSED LOT 1 (MARINA PROPERTY MANAGEMENT LLC):

1.	AFFORESTATION REQUIRED 15% OF IDA: AACO 17-8-802 (c)	50,748 SQ. FT.± OR 1.17 ACRES.
2.	FORESTED AREA EXISTING:	20,401 SQ. FT.± OR 0.47 ACRES.
3.	AFFORESTATION PROVIDED:	36,999 SQ. FT.± OR 0.85 ACRES.
4.	TOTAL AFFORESTATION:	57,400 SQ. FT.± OR 1.34 ACRES.
5.	10' VEGETATED AREA REQUIRED: AACO 17-8-802(c)	8,382 SQ. FT.± OR 0.19 ACRES.
6.	10' VEGETATED AREA PROVIDED:	8,423 SQ. FT.± OR 0.19 ACRES.

PARCEL 508 GROWTH ALLOCATION (BARBARA A. PEARSON):

1.	AFFORESTATION REQUIRED 15% OF IDA: AACO 17-8-802(c)	4,584 SQ. FT.± OR 0.10 ACRES.
2.	AFFORESTATION PROVIDED:	6,209 SQ. FT.± OR 0.10 ACRES.

LEGEND

- PROPERTY LINE / RIGHT-OF-WAY
- REMOVED PROPERTY LINE
- EXISTING CONTOUR
- PROP CONTOUR MAJOR
- EXISTING ZONING DESIGNATION
- EXISTING WOODSLINE
- LIMIT OF DISTURBANCE
- CRITICAL AREA LINE
- FEMA FLOOD ZONE
- PROPOSED AFFORESTATION AREA (15%)
- EXISTING FORESTED AREA
- PROPOSED 100FT BUFFER PLANTING AREA
- EXSTING IMPERVIOUS AREA
- PROPOSED IMPERVIOUS AREA
- 100FT CRITICAL AREA BUFFER
- 25FT CRITICAL AREA BUFFER PER 17-8-702 (2)
- SWM DEVICES

PROPOSED CONDITIONS

0 50 100 150 200

GRAPHIC SCALE
SCALE: 1"=50'

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