

Objection to National Waste Managers' 3-Year Extension Request

Judith L. Wagner, 1210 Beaver Tree Dr, Odenton, MD 21113

I am a resident of Two Rivers, a development of over 2000 homes directly abutting the proposed landfill.

I am writing to object to the request of National Waste Managers (NWM) for a 3-year extension of the Special Exception for a rubble landfill, originally granted in 1993. My arguments against this extension are as follows:

The requested extension period is too long. NWM has submitted the MDE denial for judicial review. Based on historical landfill cases, the judicial review process can be expected to take approximately one year. This timeframe suggests that a shorter extension period, such as 18 months rather than three years, would be more appropriate to align with the expected duration of the judicial review.

More importantly, I believe that AA County has a strong reason to simply deny the extension, regardless of the judicial review of the MDE denial. That is because the conditions laid out in the 1993 special exception regarding the access point proposed in the application can no longer be met. Although NWM's attorney argued in statements to the Anne Arundel (AA) County Board of Appeals in 2021-2022 that it considers any point along Conway Road that meets fee-simple access to be approved under the 1993 special exception, in 1996 the same attorney stated that NWM understood they would have to apply anew to AA County for approval of that entrance. (See attached letter – Exhibit 1.)

Therefore, I believe that AA County should deny the extension on the grounds that the entrance approved in the Special Exception of 1993 is no longer available and that any other proposed entrance would require a new special exceptions process.

If that action is deemed unwise by the AA Hearing Examiner, then I believe the extension should be limited to a period of 18 months. As a resident of Two Rivers 55+ community who arrived in Anne Arundel County in 2020, unaware that the landfill was under consideration, I deserve a sense of closure over this continuing source of anxiety.

1996-08

SUSANNE KOSTER HENLEY
ATTORNEY AT LAW
P.O. BOX 2356
47 WEST STREET
ANNAPOLIS, MARYLAND 21404-2356

LOCAL (410) 280-0530
BALT. (410) 269-1516
FAX (410) 280-2029

CATHY DUNCAN
ADMINISTRATIVE ASSISTANT

May 21, 1996

ANNE ARUNDEL CO.
RECEIVED

MAY 22 1996

PLANNING & CODE ENFORCEMENT

Kevin Dooley
Anne Arundel County
Department of Planning and
Code Enforcement
2664 Riva Road, Box 6675
Annapolis, Maryland 21401

Re: Chesapeake Terrace

Dear Mr. Dooley:

Enclosed please find copies of the report from the Traffic Group on an extension of the entrance to the sand and gravel and rubble landfill facility farther up Conway Road. Please forward these to the appropriate person for review and comment. I understand that any comments will be preliminary and that any discussions will not constitute a commitment by either party to approve an access different from that previously proposed.

Sincerely,

Susanne K. Henley
Susanne Koster Henley

SKH:cd

Enclosure

cc: Mr. Halle



410-
286-2029

IMPORTANT FAX MESSAGE:

DATE: 4/16/96 **TIME:** 5:00

NUMBER OF PAGES: 4 (Including Cover Sheet)

- Original will not follow
- Original will follow by Next Day Delivery
- Original will follow by Regular Mail
- Other _____

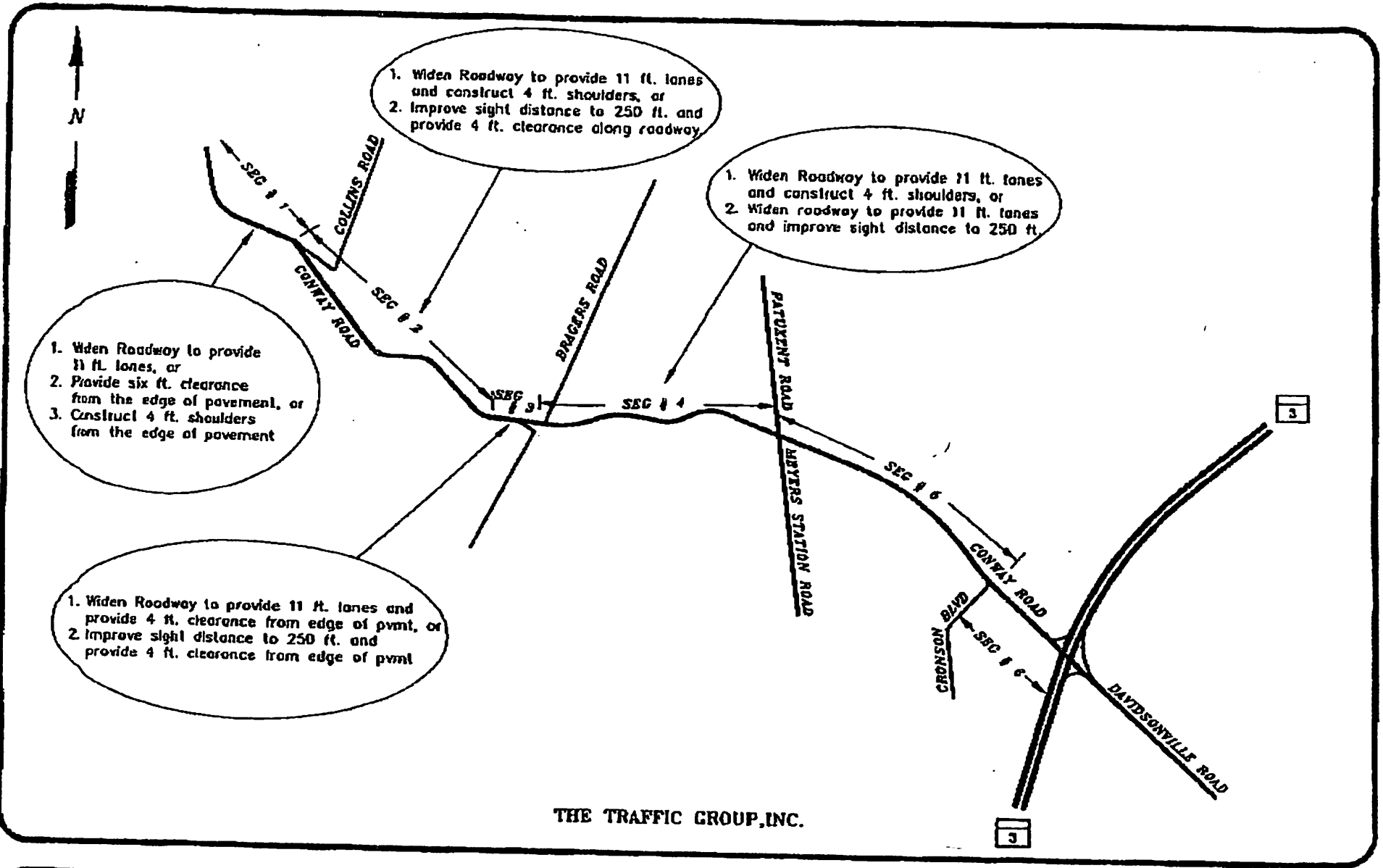
TO: Steve Fleischman **FAX:** 301-495-9452

FROM: Wes Guckert

COMMENTS:

If you do not receive the number of pages noted above, please contact Tina of this office at (410) 583-8405. Our fax number is (410) 321-8458. Thank you.

The Traffic Group, Inc.
Suite 600
40 W. Chesapeake Avenue
Towson, Maryland 21204
410-583-8405
Fax 410-321-8458

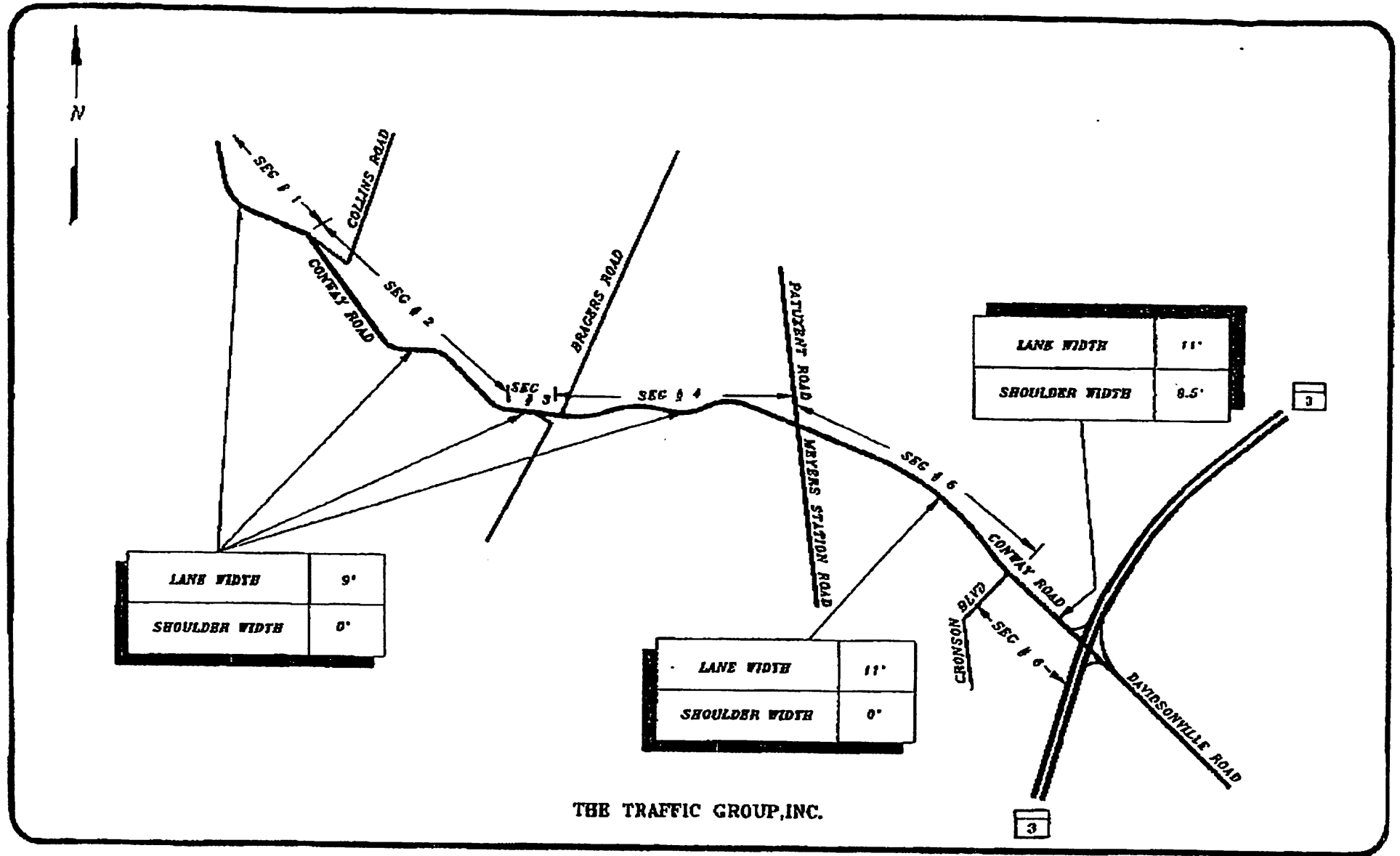


NOT TO SCALE

OPTIONAL IMPROVEMENTS TO MEET MINIMUM ROAD RATING STANDARD

Segment No.	Segment Limits		Road Rating	
	From	To	Existing	Total
1	West End	Collins Road	73	64
2	Collins Road	West Quarry access	59	56
3	West Quarry access	Bragers Road	71	61
4	Bragers Road	Patuxent Road	59	61
5	Patuxent Road	Cronson Boulevard	79	75
6	Cronson Boulevard	MD 3	83	73

RESULTS OF ROAD RATING



LANE WIDTH	9'
SHOULDER WIDTH	0'

LANE WIDTH	11'
SHOULDER WIDTH	0'

LANE WIDTH	11'
SHOULDER WIDTH	8.5'

3

3

NOT TO SCALE

ROAD SEGMENTS
EXISTING CONDITIONS