



December 19, 2023

Queen Anne's County Commissioners
and Administrator
107 North Liberty Street
Centreville, MD 21617

Subject: Centreville WWTP Proposed Text Amendment

Dear Commissioners:

Commissioners, this is a follow-up to my email to you of December 27, 2023, on behalf of CRC, in which I expressed serious concerns with the Town's proposal. Since then, we have spent considerable time in dialogue with Town representatives including a meeting with them as part of the Corsica Implementers group that oversees the Corsica River restoration. What we have learned thus far does not allay our fear that the proposed plan portends a serious threat to the continued restoration of the Corsica and conservation of its natural resource legacy.

CRC understands the Town's need and responsibility to plan for the replacement of its sewage treatment plant (WWTP). We have no problem with what we have learned about the modern MBR technology that it proposes to use in a replacement plant. The improved nutrient reduction on a per gallon basis is welcome along with other advantages the new technology would provide.

Our concerns center on the proposed relocation of the discharge point to the upper main stem of the River and the proposed dramatic increase in the volume of effluent that will be released into this fragile shallow water ecosystem, including during the most biologically vulnerable warm and hot months which are periods of high human use as well. Frankly, we are surprised that the Town would propose this dramatic increase in the amount of effluent discharge in an area of intense public use and visibility. The Town, along with the County, has made major investments to make this area a beautiful public use asset and attraction. These investments include purchase and development of a scenic public park, improvements and additions to boat dockage and landing service and expensive dredging of the waterway.

This area has seen constant, growing usage by the public for boating, kayaking, paddle boarding and fishing, including the Town's popular kid's Fishing Derby which CRC volunteers have made possible over the years. Much of the other fishing that takes place in this area, even from the Watson Road Bridge, seems to be for consumption and possibly for sustenance.

One should also acknowledge the residential waterfront properties in this area whose owners have invested in good faith that the Town and County would not act in a way that could degrade the real or perceived value of their properties for which they annually pay significant taxes. We, as you, have heard from many of these residents who are shocked and deeply concerned about the proposal.

We believe the reactions above taken at face value should register with representatives like yourselves as serious arguments against the proposed surface water discharge changes. Moreover, beyond those reactions are real concerns about the potential degradation of the River's ecosystem that we have all worked so hard to protect and improve for so many years.

The Town (via its Council) and the County (via its Commissioners) are signatories to the Corsica Watershed Restoration Action Strategy (WRAS). In that document, both governmental entities pledged to apply the principles of the strategy and work to "de-list" the river. One of the events that led to development of the

WRAS was a major failure of the Town's earlier WWTP; thousands of fish died from the pollution and littered the banks of the tributaries and river shorelines. Embarrassing regional publicity ensued.

The widely applauded Corsica WRAS led directly to the selection of the Corsica as Maryland's first "Targeted Watershed" restoration project. In September 2005 Governor Erlich stood on the bank at Conquest Preserve and announced the multimillion dollar, multiyear project. Behind him in the river floated thousands more dead fish.

Since then, the restoration project team - the Implementers - consisting of State, County, Town, NGO's, citizen-scientists and affiliated organizations have worked continuously to restore and to preserve the Corsica. Along the way, we have tried to make the Corsica restoration a model for other watersheds to follow. In fact, the Maryland government is now moving to reenergize the targeted watershed approach in the state.

We believe that progress would be placed in jeopardy by the approval of the proposed Text Amendment and presumptive option of dramatically increasing surface discharge to the river and moving the discharge location to the shallow upper Corsica. There are too many unknowns about the potential effects of those actions on this fragile, flood prone tidal area.

I use the word "option" here because we believe that other ways of handling the effluent exist and should be further pursued. Degrading the river should not be the option of expedience. There is also the question of how much additional capacity is really needed and whether such expansion is in the best interest of the current residents.

We appreciate the willingness of the Town to meet with us and to reach out to residents to try to address their concerns. The prospect of reduced nutrients through the use of new MBR technology sounds promising. But again, nothing has been revealed to allay our basic environmental concerns including: increased toxins such as pharmaceuticals, micro-plastics, chlorine and ammonia, possible increases to bacteria, ecosystem changes that would affect fish spawning and filter feeders, exacerbation of algae and clarity problems especially in warm seasons when this problem is especially present in the shallow upper Corsica as well as unknown effects of other changes in the ecosystem that would be caused by changes in salinity or tidal flow.

For these reasons we ask you not to approve the Town's proposed text amendment to the County water and sewer sanitation plan in its current form as it includes increased and year round surface discharge with relocation of discharge to the upper Corsica main stem.

Respectfully,

Frank DiGialleonardo
President, Corsica River Conservancy