

June 13, 2023

Carlos Del Toro, Secretary of the Navy
1000 Navy Pentagon,
Washington, DC 20350-1000

RE: NO Golf course at Greenbury Point, Annapolis

Dear Secretary Del Toro,

We write to ask for your intervention to assure that the 231 acres at Greenbury Point, Annapolis designated by the Navy as a natural resource conservation area open to the public be kept as such in perpetuity. This was agreed to by DOD and the Navy under the Base Realignment and Closure Act when the Naval Radio Transmitting Facility operating at Greenbury Point since 1918 was decommissioned in 1996. All but three of the communication towers were dismantled in 1999.

This agreement by the Navy was honored from 1996 onward and elaborated upon in the Integrated Natural Resources Management Plans for these 231 acres and other Naval facilities in Annapolis. These INRMPs are required for DOD lands under the Sikes Act (16 USC 670a-670o) which dictates that these plans must be reviewed annually and, if necessary, revised. This law requires INRMPs to be re-executed at intervals of not more than five years. But the last INRMP was originally prepared and signed in 2011; in 2016, it was again approved and signed; but as of this date, the 5-year deadline has not been met.

Concurrently with misguided efforts to violate the INRMP for these 231 acres by constructing an 18-hole golf course on 150 or more acres of the site, Naval Support Activity Annapolis has not fulfilled its responsibility under the Sikes Act by executing a new or extending the existing INRMP. Naval District Washington has not forced compliance. The INRMP does not just cover the 231 acres at issue but all Naval facilities in Annapolis. There is reason to believe that the process of re-issuing the INRMP has been held up by pressure by Navy-related parties who want to construct the private golf course on the 231 conservation area.

The Sikes Act mandates that the development of an INRMP for lands with conservation values must be done by the Navy in mutuality and agreement with the U.S. Fish and Wildlife Service and appropriate state agencies concerning the management of fish and wildlife. In this case, it is the Maryland Department of Natural Resources which must review and sign-off on the INRMP. Such mutual agreement and cooperation are required by law to support the principles of ecosystem management and the previous INRMPs have all been signed-off by the USFWS and Maryland DNR.

To our knowledge, neither USFWS nor Maryland DNR have been consulted on the renewal or revision of the 2016 INRMP. After a major public outcry last spring and summer over the plans for a golf course on these conservation lands, the Navy took the INRMP from the public domain, removing access to it online. Only after the filing of a FOIA request by a journalist was it again posted.

Further violations of the Sikes Act and the INRMP under it are occurring and seem to be related to the golf course plans. Naval Support Activity Annapolis acted to greatly restrict public access since the golf course plans were revealed despite more than two decades of mostly open access and the clear provisions in the INRMP mandating such public access. Such restrictions blatantly violate the INRMP for Greenbury Point.

This access and usage are dictated on page 5-21 of the INRMP: “Because of the extensive area of undeveloped land, **outdoor recreation and environmental awareness are the primary focus of the NRP at NSAA North Severn**. Outdoor recreation includes natural resources-based recreation activities and does not refer to sports/athletics or boating, which also occur at NSAA North Severn. The Greenbury Point Nature Center, 2.1 miles of walking trails, and a bird-watching platform are the primary natural resource based activities supported by the Environmental Office.”

As noted on Naval Support Activity Annapolis' website: "Greenbury Point, located at the mouth of Severn River in Anne Arundel County, is a Navy property managed by Naval Support Activity (NSA) Annapolis as a mission-supportive natural resources conservation area. It has become a popular hiking destination for nature lovers, runners, walkers, and dog walkers. While the Navy allows public access to the conservation area when safe to do so, the area is also critical to the NSA Annapolis mission and can close anytime without prior notification."

The INRMP for all Navy-Annapolis lands contains a map of land uses for management purposes at page 5-2, figure 5-1. The entire 231 acres at Greenbury Point are listed as the most highly protected land use—a Conservation Area.

The only times closures had occurred were the infrequent times when the firearm range was operating or other training events precluded public access. But recently, NSA-Annapolis closed the East and West trail roads Tuesday through Saturday only allowing the public use of these main 3.1 miles of walking, hiking, and running trail roads two days a week. These trail roads around the perimeter of Greenbury Point include the area surrounding the three remaining communication towers. These road trails have smaller trails off of them where people can reach the shoreline of Mill Creek and Carr Creek as well as the Severn River and Chesapeake Bay. Closing these trails denies people access to water views and their locating waterbirds.

These trails were even closed on Earth Day and National Migratory Day this year. Walking, hiking, or running the narrow open trails remaining can be done but poison ivy flourishes on either side and some areas have branches across them. New fencing has been installed and the entrance to the 231 acres close to the Nature Center appears under construction for a gate to block access. This all violates the INRMP and years of access to the public guaranteed since closure of the Naval Radio Transmitting Facility back in 1996.

This significant restriction of public access began after the public opposition to the golf course and despite a letter to the Navy Secretary from leaders of Maryland's congressional delegation demanding that any proposal for Greenbury Point must protect the "environmentally sensitive" area, maintain public access to its trails "at current levels, or preferably enhanced," and be in compliance with the Chesapeake Bay Critical Area and be "fully protected in perpetuity." The letter was signed on August 15 by Senators Benjamin Cardin and Chris Van Hollen and Representatives John Sarbanes and C.A. Dutch Ruppersberger. Rep. Sarbanes represents the area in question and Rep. Ruppersberger is Chairman of the Naval Academy's Board of Visitors.

This Congressional letter and Integrated Natural Resource Management Plan are not being adhered to in the proper management of Greenbury Point. Access to the site has recently been severely limited through major trail closures, chain link fencing, barricades on Beach Street and a new gate being installed. This has nothing to do with security or military operations. These measures are depriving personnel and the public of access and enjoyable usage in defiance of the mission for the site and the INRMP. These new restrictions were imposed only after the vigorous opposition of the public to the golf course.

Tina Lorentzen served as the U.S. Naval Academy's natural resources manager for 12 years and scrupulously followed the INRMP for the Greenbury Point land, overseeing many conservation improvements. These included establishing 33 acres of wetland habitat, planting 35 acres of grassland meadows, managing an invasive weed control program on several hundred acres, conducting a diamondback terrapin release program, and establishing a small Nature Center with exhibits. She used the Center regularly for hosting local schools and scout groups for educational nature programs before they hiked some of the 3 miles of trail she helped maintain.

Ms. Lorentzen supervised interns to run the Nature Center and helped manage the Navy lands. She oversaw a deer and herpetology census and set up recreational fishing areas for Navy personnel. Unfortunately, Tina died in 2007. Subsequently, management of Greenbury Point pursuant to the INRMP slowly deteriorated.

This is from the 2016 INRMP: "The NSA Annapolis Commanding Officer must ensure preparation, completion, and implementation of the INRMP and should systematically apply conservation practices set forth in the plan. It

is his/her responsibility to act as stewards of installation natural resources and integrate natural resources requirements into the day-to-day decision-making process; involve appropriate operational and training commands in the INRMP review process to ensure no net loss of military mission; and endorse this INRMP via Commanding Officer signature.”

This is not and has not been done for years at Greenbury Point. The Nature Center has dust clinging to the taxidermy, old nature prints either fell off the walls or were peeling off the walls. Students no longer visit. The bathroom is locked all the time so visitors using the trails and roads for running, walking, birding, or enjoying nature, whether military or civilian, have no bathroom facilities because NSA Annapolis has allowed the visitor center to deteriorate and refuses to open the bathroom for use. The INRMP mentions the Visitor Center as important to the functioning of the Greenbury Point natural area.

The recycling cage by the bird blind has had a sign missing for months and the bird blind has had a hole in the roof for many years. The current resource manager told users she would replace the sign but it was still missing a few weeks ago. Controlled burns mentioned in the INRMP were conducted previously and were supposed to occur every four years per the INRMP. This has not been done for many years. The conservation area is being neglected as is the INRMP.

The gravest recent threat to this natural resource area remains—an attempt by the Naval Academy Golf Association (NAGA) through its President, Chet Gladchuk, to build an 18-hole golf course of at least 150 acres of the 231 acre site. Mr. Gladchuk, who also serves as the Naval Academy Athletic Association Director, formally wrote to you on Feb. 15, 2022 seeking a single source contract to lease the land and build the golf course. Community outrage was swift and broad as there had been no notice or input by the public or the U.S. FWS or Maryland DNR.

Mr. Gladchuk pledged to publicly explain the plans and scheduled a May 10, 2022 public meeting to do so and to receive input. The intense public opposition caused Mr. Gladchuk to cancel the meeting. County Executive Steuart Pittman submitted plans to the Navy in early August to lease the property, keeping it as a conservation area park under the County Recreation and Parks agency.

On August 15, Naval District Washington stated that because of their receipt of these competing proposals, they could not consider either for a sole source lease. This at least temporarily ended consideration of changes at Greenbury Point. Despite pledges to do so, Mr. Gladchuk has refused to share any details of his proposal for the golf course with the public and public attempts to gain access to the plans have been blocked by the Navy. We recently inadvertently learned that Mr. Gladchuk is persisting in his plans and has succeeded in gaining funding to have a company owned by Jack Nicklaus to conduct a feasibility study for building a second golf course at Greenbury Point in Annapolis. If feasible, the Nicklaus company would be interested in designing the new golf course.

The golf course proposed by Mr. Gladchuk is far enough along that a descriptive list of all the environmental laws and evaluations required to construct a golf course on sensitive natural resource lands and the cost of compliance were listed in documents obtained through a formal FOIA filing. These documents included details dated January 10, 2022 outlining numerous environmental and permitting requirements that the officials listed as needed in order for the golf course project to advance.

These included compliance with the National Environmental Policy Act (NEPA), stormwater permitting requirements, state Critical Area law, tidal and nontidal wetland laws, forest conservation laws, archeological survey laws, and policy and statutory guidelines for natural resources management and conservation. Among the documents was an email exchange between an official from the Public Works Department of the Naval Support Activity Annapolis dated March 1, 2022 written to a colleague that he had received a request from Mr. Gladchuk to lease land at Greenbury Point to the Naval Academy Golf Association “to construct and operate a second golf course.”

The correspondence listed 14 separate documents needed for the groundwork to begin on the project. The list included a map and legal description of the property, lease terms, administrative fees, and a justification for why the lessee should be the Naval Academy Golf Association.

We note that we believe there has been a strong effort by Mr. Gladchuk/NAGA/NAAA, and certain Navy officials to continue to seek approval for the construction of the golf course on Greenbury Point conservation land.

This is despite an existing USNA golf course being within a few hundred yards of the proposed new golf course. It was completely rebuilt to championship level in 2020-2021 costing \$7 million and, according to Mr. Gladchuk, meeting all brigade requirements. A total of 191 trees were removed, many of them large ones. This golf course has many non-military members who pay \$22,500 to join and \$3,768 in annual dues. The second golf course would be a private enterprise on Navy land and violate all agreements and the terms of the INRMP for Greenbury Point. The attached list details why the 231 acres of sensitive and archaeologically important land at Greenbury Point should be protected forever and never used for a golf course, one of the most polluting land uses.

We ask that you direct and review compliance with the Sikes Act so that an INRMP is adopted that continues the conservation values in the 2016 INRMP for this 231 acre site and explicitly rules out construction of a golf course and keeps the land as a conservation area open to the public in perpetuity.

We also suggest these options you could exercise:

1. County Park. Allow Anne Arundel County to lease the 231 acres as a County park that adheres to the INRMP terms on a 99-year basis. The County is already obligated under an agreement with the Navy to maintain the three remaining communication towers. This was done in California for San Onofre State Beach and Marine Corps Base Camp Pendleton (https://www.parks.ca.gov/?page_id=23710).

2. National Park or Wildlife Refuge. Transfer management to the National Park Service or U.S. Fish and Wildlife Service as a National Park or National Wildlife Refuge. Either this or #2 could be done under the Federal Lands to Parks program (See: <https://www.nps.gov/orgs/1508/index.htm>).

3. National Monument Using the Antiquities Act. The President could declare the 231 acre site with Native American and 17th century historical artifacts, including the founding of Providence in 1650, a National Monument. See Fort Ord California (https://en.wikipedia.org/wiki/Fort_Ord).

4. Conservation Easement. Have a permanent conservation easement placed on the land that assures its conservation.

Respectfully Submitted,

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THESE SIGNATORIES ASKED TO BE ADDED TO THE LETTER AFTER IT WAS SENT:

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LAWS PROTECTING NATURAL RESOURCE, ENVIRONMENTAL, AND CULTURAL ATTRIBUTES AT GREENBURY POINT BLOCKING GOLF COURSE CONSTRUCTION.

ALL OF GREENBURY POINT IS A CONSERVATION AREA. The INRMP for all Navy-Annapolis lands maps out land use for management purposes at page 5-2, figure 5-1. The entire 231 acres at Greenbury Point are listed as the most protected: a designated Conservation Area that should preclude construction of a 150 acre golf course.

MOST ALL OF GREENBURY POINT IS LISTED AS WETLAND, FLOODPLAIN, INSTALLATION RESTORATION AREA. OR OPERATIONALLY CONSTRAINED

The map of Installation Restraint Sites at page 5.4, Figure 5-2 documents that all 231 acres of Greenbury Point are restrained from development. .

PRIMACY OF OUTDOOR RECREATION AND ENVIRONMENTAL AWARENESS. The INRMP provides at 5-37-5-38: “Because of the extensive area of undeveloped land, outdoor recreation and environmental awareness are the primary focus of the NRP at NSAA North Severn. Outdoor recreation includes natural resources-based recreation activities and does not refer to sports/athletics or boating, which also occur at NSAA North Severn. The Greenbury Point Nature Center, 2.1 miles of walking trails, and a bird-watching platform are the primary natural resource based activities supported by the Environmental Office.

Trail maintenance, nature center operations, program organization and presentation, updating the natural resources website, and volunteer oversight are ongoing activities conducted by the natural resources manager. Planning and participating in annual Earth Day, Arbor Day, and National Public Lands Day events are additional environmental awareness responsibilities of the NRP.

The primary goals of outdoor recreation management at NSAA North Severn are to: Provide outdoor recreational opportunities for station personnel, their dependents, and the general public to the maximum extent possible within the constraints of the installation mission and capability of the natural resources; and Foster understanding and awareness of the environment through educational conservation programs.”

A golf course would destroy these priorities and goals.

COASTAL ZONE MANAGEMENT. All of the acreage at Greenbury Point is in Maryland’s coastal zone and subject to the federal Coastal Zone Management Act. The INRMP at page 2-16 provides: “Under the federal CZMA (Coastal Zone Management Act) , activities on federal lands that are reasonably likely to affect use of lands or waters, or natural resources of the coastal zone beyond the boundaries of the federal property, must be consistent to the maximum extent practicable with the enforceable policies of the state’s CZMP. Coastal zone resources include the shorelines and the adjacent waterbodies at NSAA North Severn. NSAA North Severn is required to demonstrate consistency with the Critical Area Law requirements as part of its compliance with the CZMA. Specific coastal and marine management initiatives in which Navy personnel have participated in and around NSAA North Severn include oyster reef restoration, shoreline stabilization, SAV establishment, and nutrient and sediment reduction programs.”

Construction of a 150 acre golf course would be incompatible with CZMA provisions.

CRITICAL AREA PROTECTIONS. The INRMP at page 2-16 provides that: “The Chesapeake Bay Critical Area Act, an enforceable policy of the Maryland CZMP, is a joint effort by state and local governments to address the impacts of land development on habitat and aquatic resources in the bay. In Maryland, the Chesapeake Bay Critical Area designation extends 1,000 feet inland from the mean high water mark or from the edge of tidal

wetlands and is intended to significantly limit development on properties along significant tributaries to the Chesapeake Bay (MDE 2007).”

All of the 231 acres at Greenbury Point are in the Critical Area. Full compliance with the Critical Area law provisions restricting land use, protecting wetlands and forest, and prohibiting development in 100 foot buffers inland from tidal waters must be followed and would all but eliminate construction of a golf course.

RESILIENCY. Greenbury Point is one of the four areas prone to coastal flooding, sea level rise, and stormwater impact under the USNA Military Installation Resilience Plan for Annapolis. Construction of a golf course or other such facilities will increase stormwater flows, strip protective forests, and result in nontidal wetland loss exacerbating flooding.

WETLAND LOSS AND DAMAGE. “Intact, functioning wetlands are of extreme importance to the health of the ecosystem and the human environment because of services such as flood control, pollution abatement, erosion control, fisheries habitat, and more. A large number of federal, state, and local laws, therefore, regulate land uses and actions that have the potential to impact wetlands and water quality .Wetlands are regulated by the CWA, EO 11990 Protection of Wetlands, and Maryland state regulations. In addition, the Navy considers wetland protection a top priority as reflected by their ‘No Net Loss’ wetland policy.” INRMP at page 2-11.

Wetlands and their buffers would be developed for a golf course contrary to these dictates.

TIDAL WETLAND BUFFER. The INRMP at page 2-18 provides: “A fundamental requirement of the Chesapeake Bay Critical Area Protection Program is the establishment, preservation, and maintenance of naturally vegetated, forested buffer landward from the mean high water line of tidal waters or from the edge of tidal wetlands and tributary streams. RCAs require maintenance of a 200-foot buffer, whereas, LDAs require a 100-foot buffer. The buffer acts as a water quality filter for the removal or reduction of sediment, nutrients, and toxic substances found in runoff. The buffer also minimizes the adverse impact of human activities on habitat within the Critical Area. No disturbance of the buffer is permitted except those associated with water dependent facilities unless an applicant can meet the strict provisions for a variance.”

The entire Greenbury Point acreage is surrounded by the Chesapeake Bay and rivers, therefore a 100 foot buffer is a no build area which puts much of the land off limits to a golf course.

NONTIDAL WETLANDS. The INRMP at pages 2-18-2-19 provides: “The minimum standards established by the state and adopted by the local jurisdictions for the conservation of nontidal wetlands in the Critical Area include: (1) the establishment and maintenance of a vegetated buffer of 25 feet around areas identified as nontidal wetlands. (2) new development must not substantially damage or change the character of nontidal wetlands; and (3) only new development that is intrinsically water-dependent, or of substantial economic benefit to the public, is allowed to disturb nontidal wetlands.”

The golf course would be constructed in and around these wetlands in the Critical Area. Such construction does meet the test in this dictate and should not be allowed.

RARE, THREATENED, AND ENDANGERED SPECIES MANAGEMENT. The INRMP at page 5-7 states: “A survey for unique natural communities and rare, threatened and endangered species was conducted in 1996 at Greenbury Point, but no other portion of NSAA North Severn (U.S. Navy 1997)...No federally listed threatened, endangered, or candidate species were identified at in the survey. A number of state-listed bird species, however, have been documented. Included are three state-endangered species, mourning warbler (*Oporornis philadelphia*), royal tern (*Thalasseus maximus*), and short-eared owl (*Asio flammeus*); a state-threatened species, least tern (*Sternula antillarum*); and two species listed as in need of conservation, American peregrine falcon (*Falco peregrinus anatum*) and Nashville warbler (*Vermivora ruficapilla*) (MDNR 2010a)...Federal agencies are required to ensure that their actions will not adversely impact endangered species. Updates to past surveys to

substantiate the presence or absence of listed species are necessary to ensure compliance and population health. Failure to implement this project would result in noncompliance with the Sikes Act and Navy policy on natural resources management, and potential noncompliance with the ESA and state laws.”

The golf course would destroy habitat and otherwise threaten the continued presence of these state endangered birds.

MIGRATORY BIRD CONSERVATION. The INRMP provides at page 5-23 and 5-28.: “Because of the availability of habitat and the relatively natural state of the site, most fish and wildlife surveys that have been conducted by the NSA Annapolis Natural Resources Program have focused on Greenbury Point. In 1997, the rare, threatened, and endangered species habitat survey identified a number of bird and wildlife species at Greenbury Point (U.S. Navy 1997)...Over 150 bird species [now 216] have been documented at Greenbury Point and the adjacent waterbodies....Although not listed as federally protected species, a number of species occurring at NSAA North Severn are considered birds of conservation concern by the USFWS.... Migratory bird management at NSAA North Severn focuses on the conservation and enhancement of migratory bird habitat in support of the MBTA and EO 13186....The diversity of habitats supports a wide variety of migratory birds. Habitat conservation and enhancement are the primary management activities that are conducted at NSAA North Severn to migratory bird species. During annual INRMP reviews, the natural resources manager and cooperating parties must assess migratory bird conservation measures that have been implemented and the effectiveness of the conservation measures in avoiding, minimizing, or mitigating take of migratory birds”

These provisions require protective measures for migratory birds from activities like a golf course that would affect them.

FOREST CONSERVATION. The INRMP provides at page 5-33: “The primary objectives of forest management at NSAA North Severn are to: Conserve and enhance existing forested areas that contribute to overall ecosystem function; and Increase forested acreage through reforestation where practicable, within the constraints of the installation mission. Future base plans should continue to conserve the installation’s forested areas. In particular, the forest mitigation site (see Figure 5-11) must be maintained in a permanently forested condition as a Chesapeake Bay Critical Area forest mitigation site.”

This reforestation site is at the southern tip of Greenbury Point and is the area around the three extant towers. It was remediation for forest cleared to build the nearby Brigade Sports Facility. This is yet another area off limits for construction of a golf course although NAGA plans show they could clear trees in this reforestation mitigation area..

CULTURAL RESOURCES MANAGEMENT. The INRMP provides at page 5-40 “NSAA North Severn is recognized for its historical and archaeological significance dating back Two archeological sites have been documented at NSAA North Severn (Figure 5-12). Fort Nonsense (18AN550), which was constructed in 1812 as part of a system of defenses for Annapolis, is listed in the National Register of Historic Places. Excavations at another the seventeenth century site, Towne Neck (18AN944), dating to 1649, indicate the site is potentially eligible for listing in the National Register; however, no formal nomination has been submitted. Areas of high probability for 17th Century significance occur throughout NSAA North Severn and are generally located within previously undisturbed areas.”

This means about one-half of the acreage at Greenbury Point is shown as a High Probability Area for Cultural Resources in the map at 5-12 on page 5-41. This should inhibit construction of a golf course on these lands.