

The following table includes all the written and oral comments received on Chapter 5 of the Draft Comprehensive Plan. This includes comments of Planning Commission members at the Public Hearing held on May 19, 2005. For each item the County Planning Staff has provided a comment and recommendation for the Planning Commission to address at the July 21, 2005 review of this Chapter. The references are all to the May 19 draft. A new complete draft reflecting the “Staff Comment” column will be prepared for the July 21 meeting.

COMMENTS ON CHAPTER 5

SECTION	COMMENT/INPUT	STAFF COMMENT	PC
All	<p>An alternate overall structure was proposed: WATER QUALITY AND SHORELINE PROTECTION</p> <p>Bay, Rivers, and Streams (tidewater): Erosion Control Agricultural Riparian Buffers Sewerage Plant Outfall Monitoring & Improvement Quality Monitoring/Testing</p> <p>Potable Water Sources Ground Water (shallow aquifer) Quality Monitoring/Testing Artesian Water (deep Aquifer) Quality Monitoring/Testing Future Potable Water Sources</p> <p>Education Program</p>	<p>The proposed structure is not consistent with CBLAB requirements for the contents of the “Water Quality Protection Plan”. Some reorganization is planned for the Groundwater section, where we believe we have some leeway. The proposed outline will be considered in the reorganization of Section B.7 of this Chapter.</p>	
Introduction	<p>The following is recommended as an introduction:</p> <p><i>Water quality in both saltwater estuaries and in our sources of drinking water is of paramount importance to our futures here in Northumberland County. Bay, river and stream water quality will determine the fecundity of our shores for gamefish, menhaden, crabs and oysters – and the health of our fishing industry.</i></p>	<p>Add as a lead-in statement. Reword to that shown below:</p> <p><i>Water quality in both saltwater estuaries and in our sources of drinking water is of paramount importance to our futures here in Northumberland County. Bay, river and stream water quality will determine the fecundity of our shores for gamefish,</i></p>	X

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	<p><i>Both the shallow and deep aquifers, that currently supply primary sources of drinking and household water, are being threatened by over-use and contamination. Shoreline protection, protection of our riparian buffers, is also an issue in an environment where tremendous quantities of nitrate are being released via ground water into the bay daily and large expanses of shoreline are being eaten away by erosion at a rate exceeding 2 feet per year. Our Bay waterfront is a very real economic advantage for our County. Both our fishing industry and our Tourist industry are absolutely dependent on a healthy environment. In fact, our basic quality of life depends on careful stewardship of our water resources. What seem to be abundant water resources are really very precious. We must not squander them for our children.</i></p>	<p><i>menhaden, crabs and oysters – and the health of our fishing industry. Both the shallow and deep aquifers, that currently supply primary sources of drinking and household water, are being threatened by over-use and contamination. Shoreline protection through protection of our riparian buffers, is also an issue in an environment where tremendous quantities of various harmful chemicals are being released via ground water into the bay daily and large expanses of shoreline are being eaten away by erosion. Our waterfront is a very real economic advantage for our County. Both our fishing industry and our tourist industry are absolutely dependent on a healthy water related environment. In fact, our basic quality of life depends on careful stewardship of our once-abundant water resources and we must not squander them for our children.</i></p>	
Introduction	All of page 1 focuses on the Water Quality Protection Plan and doesn't address water quantity and shoreline protection	Modify the text to include these items, but emphasize that the CBLAD required Plan is included and not minimized.	
B. 1. (c)	<p>(c) Development shall be done in such a way as to preserve farmlands, forests, natural resources, historic features and other environmentally-sensitive areas.</p> <p>If this were followed there would be no development. You can't preserve farmland and forests and still have development.</p>	The comment is literally correct. However any qualification of the sentence would weaken the intent. Leave the sentence unchanged	
B.3.1 (pg 5:4)	Change "treated" to "sterilized" (at end of sentence)	Reject the word change – the effluent is not "sterilized"	

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B.3.2 (pg 5:4)	Reference is made to the “high seasonable water table” Comment: “It’s not always seasonable.”	Reword sentence to refer to the “High water table”	
B.3.2	Add to the beginning of the sentence 2. on the high seasonable water table: “The water table is another important factor in determining the suitability for a conventional septic system drain field. In areas where the water table is less than 36 inches, drain fields could actually be below the water table and ineffective during periods when the water table saturates the soil where the drain field is located. If the water table does come in contact with the drainfield, pathogens and other pollutants could be directly discharged into the groundwater, possibly entering nearby residents’ shallow wells. Needless to say, this situation should be avoided by proper analysis of the soils prior to issuing a permit for conventional septic system construction.”	Accept the addition but do not include the sentence starting with “Needless ...”	
B.3 (b)	In Health Dept regulations paragraph, reword to clarify that the drainfield trench bottoms should be 36” and 24” above seasonable water table indicators.	Clarification will be made.	
B.3 (c)	In Health Dept regulations paragraph, reword as follows: “but in no instance can a sewage disposal system be installed closer than 70 feet ...”	Clarification will be made.	
B.3	Add where appropriate: “It would be desirable to require a 100 foot riparian buffer consisting of mature trees with a ground cover of shrubs and	Add the first sentence but also add a qualification regarding residential property cleared to provide a water view. The second	x

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	grasses between drain fields and the nearest water. This should be a requirement on property immediately adjacent to waterways irrespective of grandfathering”	sentence starting with: “This should be...” is to be deleted as confusing.	
B.3.(b) & (c)	<p>In General Policies paragraph: <i>Who is this Certified Inspector? Is it a county employee, a state VDH employee, or is the homeowner required to hire this Certified Inspector?</i></p> <p><i>How often is regularly?</i></p>	Clarifications will be added to answer the questions. Current thinking is that Certified Inspectors are to be hired by the homeowner. However, the entire area of inspection and maintenance of engineered systems and the roles of the County and Health Department should be reviewed to establish appropriate policies.	X
B.3.(b) & (c)	<i>If you are requiring this (inspection) of alternative systems, shouldn't you effectively enforce the five year inspection and pump-out for conventional septic systems?</i>	In our opinion, these are two independent requirements. Both are desirable, but the implementation is different.	
B.3. (b) & (c)	<p>General Policies</p> <p>How will you accommodate low income home owners who can not afford to hire an inspector?</p>	It is assumed the organization that facilitated the initial acquisition of the engineered system would also include the regular inspection as part of the purchase contract with the supplier or in the warranty.	x
B.3.(e)	<p>In General Policies paragraph (e): Replace the last sentence on the “use of garbage disposals...” with the following: “In addition to reducing the hydraulic load that needs to be treated by the sewage disposal system, this also reduces the demand on groundwater resources in the County, preserving</p>	Incorporate the recommended change.	

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	potable groundwater for future uses. To reduce the amount of solids that enter the sewage system, the use of garbage disposals is discouraged."		
B.5.(a)	Eliminate the word “no” before “lower than eight”. The use of a double negative reverses the intention of the paragraph.	Paragraph has been rewritten	
B.5.(a)	Modify the first sentence as shown below: "Residential subdivisions or other developments involving buildings designed for human occupancy must meet County requirements establishing that the required height of any occupied floor area of a building shall be above the 100-year floodplain level."	Modification shall be made	
B.5.(a)	General Comment: “I think it would be a good idea, in light of the recent hazard mitigation plan, to possibly to raise the height 6-12 inches ABOVE the 100 yr floodplain. I do not know if this requires an ordinance change before passing the comp plan, or whether the comp plan is the first step. Mr. Eades or Mr. Shirley should know the requirements. Of course, this addition is contingent on whether Northumberland County agrees with the stricter standard. A little bit of	The requirements are established by the State and by FEMA. The County has no authority to implement more stringent rules.	x

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	investment now could stave off hundreds of thousands of dollars later in flood damages.”		
B.6	Historic and Archeological Resources. “Would it be useful to list the 13 sites? This document should be as useful as possible to the citizens.”	Sites are listed in Chapter 1. County Historical Society has been requested to review Chap 1 and the section moved to Chap 3.	
New 6.(a)	Start the sentence with: “ Continue to identify the RPA ...	Concur	
B.7	Protection of the County’s Groundwater Supply Replace first four paragraphs with recommended rewrite.	Replacement was made and current write-up reflects recommendation. Chapter 1 was also modified.	
B. 7 (pg 5:7)	At end of first paragraph, add “ agriculture pollution by infiltration ” as another example of sources of pollution.	Concur	
B. 7 (pg 5:8)	Modify the existing sentence as shown below in Bold: Policies for the protection of potable water from pollution are as follows and additional measures may be implemented in accordance with state mandates for water supply planning currently being promulgated:	Concur	
B.7 (pg 5:8)	Following the sentence in the comment above, reorganize the remainder of Section 7 following the following outline: (a) Protection of Water Quality Surficial Aquifer (conventional wells) Artesian Aquifers (b) Water Quantity: Protection of Supply Availability	Concur	

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	Surficial Aquifer Artesian Aquifers Reservoirs		
B.7 (pg 5:8)	<p>Insert New</p> <p>(a) Protection of Water Quality</p> <p>Surficial Aquifer (conventional wells)</p> <p>Because an individual well in this aquifer can easily be the source of contamination for neighboring wells, community awareness and procedures for protection are critical.</p> <p>(1) A Water Advisory Council shall be appointed to assist the Planning Commission in researching and recommending strategies for protection of our water quality with funding available to hire a hydrogeologic consultant as required.</p>	<p>The Water Advisory Council is a good idea. However, because of the common problems across the Counties of the NN, it should be a component of the NNPDC. Northumberland County would be pleased to support its activities.</p> <p>The State is requiring the Counties of the NN to develop water supply plans and the County will be working with the NNPDC on a regional basis to develop this plan.</p>	x
Continued	<p>(2) The Water Advisory Council shall establish a protocol for swift remediation of wells deemed to be a health hazard or a physical danger. This would provide for a coordinated response to events causing or threatening contamination of conventional wells such as improper capping, putting trash in a well, and removing abandoned vehicles near wells. The Water Advisory Council shall review the need for county ordinances to implement such response.</p>	See comment above	

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Continued	(3) Since state agencies do not provide for the testing of wells and water samples can easily be contaminated by an inexperienced person, the Water Advisory Council shall access educational resources to assist homeowners in evaluating maintenance needs for their wells including inspection for structural defects, regular disinfection and testing-- and develop methods of communicating such to county residents.	See comment above	
Continued	(4) The Water Advisory Council shall develop and recommend a basis for acquiring funds for use by the county in addressing water problems such as levying the allowable county fee for water well permits.	See Comment above	
B.7	Insert New – continue from above (topic change) (5) (a) Proper capping of a conventional well is essential to preserve the safety of drinking water. It is also necessary to secure the safety of our children. Therefore a county ordinance shall be drafted to require capping of conventional wells to current Health Department standards including wells which were constructed prior to the permitting of wells by the Health Department.	Such an ordinance currently exists.	x
Continue from Above	(5) (b) The County recommends the sealing of all well caps to prevent intrusion of contaminants. For shallow bored wells this can be done with methods that allow for access to service the	Concur	

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	plumbing.		
B.7	Buffers should be required around shallow wells to avoid contamination.	Concur in the need for buffers.	
B.7	Insert New – Continue (8) The County shall cooperate with the Virginia Department of Health’s program to provide reimbursement for a monitor and water testing relative to biosolids/sewage sludge land applications.	Concur	
B.7(b)	“In cooperation with ... etc”: Does the county really intend to do this? Agricultural chemical use is not monitored by DEQ or EPA. Nutrient management plans are required for the land application of sewage sludge, but are otherwise voluntary. BMPs are not more widely used because farmers want to be paid to establish them. For example, there are many violations of the Bay Act where fields are too close to the water. This is neither being monitored nor enforced. Few farmers will voluntarily take land out of production to establish a legal RPA. Does the County intend to enforce the agricultural RPA?	Item unchanged from 1996 Plan. The comment will be considered when Chapter 6, Implementation is drafted.	
B.7 (b)	Recommend add the Virginia Department of Health, and the Department of Conservation and Recreation to the list of organizations with which to cooperate.	Concur	
B.7 (c)	Replace current paragraph with the following. (6) The Health Department should continue to	The Health Dept does not inspect septic systems for proper functioning.	

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	<p>inspect septic tanks-systems for proper functioning. When septic tanks systems are found to be defective so as to present a hazard to the water supply groundwater supplies or shellfish waters, appropriate action should be ordered to remedy the problem. If such action is not undertaken by the homeowner within a reasonable time frame, court action shall be initiated.</p>	<p>The current item needs to be reviewed regarding the need for regular inspection of conventional systems. No change is recommended at this time.</p>	
B.7.(d)	<p>Modify sentence as shown: “Continue to work with the Bureau of Shellfish Sanitation and the Department of Environmental Quality to survey and monitor the health of shellfish ...”</p> <p>DEQ is responsible to EPA for addressing the formal impairment resulting from bacterial contamination of the headwaters of all our waterways.</p>	<p>Agree to addition</p>	
B.7.(e)	<p>Comment regarding the phenomena of reserve drain fields, as platted by developers:</p> <p>With land prices at a premium, in order to maximize the development potential on smaller lots, developers are creating a reserve drain field smaller than needed for a conventional drainfield. This effectively increases the build-able area on the lot. The developers state that this reserve drainfield is for an alternative septic system drainfield. I am not sure this is a good practice to allow, but I am not sure the county can legally force a developer to set aside enough room for a conventional septic system drainfield. I think that</p>	<p>Add a comment in the Comp Plan to the effect that the County discourages the identification of reserve drain fields that are smaller than required for conventional systems unless an engineered system is initially installed.</p>	x

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	<p>landowners need to be educated that if their conventional septic system fails, they will be forced by the health department to put in a \$15,000 to \$20,000 alternative septic system, since the reserve drainfield is that small. If this practice continues, the end result, after 25-30 years, will be more and more alternative septic systems, and ensuing management difficulties. I think at the very least, the comp plan should mention that they would discourage the use of alternative reserve fields.</p>		
B.7.(h)	<p>The sentence states: “Subdivisions with more than 14 lots should be required to have either a single public water supply or individual wells.” What are the alternatives? What is the point?</p>	<p>The reason for this wording is because developers were putting in multiple wells of 14 persons each, apparently to avoid Health Department regulation.</p>	
B.7 (h)	<p>The sentence limiting water systems to either one 14-user well or a public system does not consider the economics. Two or three or maybe more 14-user wells are more economic than a public system. The water in the deep aquifer is very pure and does not produce a health hazard</p>	<p>Reword the sentence as follows: Subdivisions may have either a single public water supply or multiple wells with up to 14 connections on each, subject to Health Department approval.</p>	x
B.7.(h)	<p>“Non-point pollution sources will be reduced through monitoring of operations that produce such pollution.” Monitoring does not reduce. The biggest non-point source of pollution in the county is the use of animal waste as fertilizer. There is currently no monitoring of poultry litter, voluntary compliance with suggested guidelines, and no required nutrient</p>	<p>The sentence will be reworded as follows: “Non-point pollution sources will be reduced by requiring buffers between the sources of pollution and the sources of potable water.”</p>	X

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	<p>management plans (unlike sewage sludge.) Does the county really intend to monitor the use of poultry waste? The County likely has no power to reduce the land application of any form of animal waste.</p>		
B.7	<p>Add New: (12) Residents will be asked to notify the County Planner if they know the location of abandoned wells such as those used by former sawmills.</p>	<p>Accept the addition with additional examples of “former owners or land users” added at the end. Delete the word “Planner”, just notify the County</p>	
B.7 (i)(1)	<p>Good section, however, DEQ is moving towards discouraging underground tanks for the most part and encouraging above ground storage tanks with appropriate sized concrete containment areas with above adequate size to contain the contents of the tank in the event of a catastrophic failure. Suggest adding the phrase “Above ground tanks (properly secured to prevent dislodging during hurricanes) are preferred to underground tanks.”</p>	<p>The suggested addition is too general. For example is it intended that this apply to new service stations? To new homes? Recommend not include the added wording.</p>	X
B.7	<p>Add New: (13) The County will consult with the state Health Department regarding its requirement to abandon shallow wells when an artesian well is dug. This county has special needs. First, artesian water is high in sodium and may one day be unavailable. Second water can be obtained from a shallow well by hand; during power</p>	<p>Concur in the addition, but delete the last sentence regarding the fee as not relevant in the Comp Plan.</p>	

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	<p>outages, but not from an artesian well. The Health Department currently requires the homeowner to pay a \$77.00 fee to be allowed to keep their shallow well.</p>		
B.7	<p>Add New:</p> <p>Artesian Aquifers</p> <p>(12) The high sodium content in our artesian aquifers can exacerbate health conditions and damage household plants and flowers. The Water Advisory Council shall develop ways of making this information widely available to county residents. <i>(Sodium levels range from 110 to 185 milligrams per liter in the county. The United States Environmental Protection Agency recommends no more than 20 mg/l for persons whose health requires the limitation of sodium intake.)</i></p>	<p>Recommend adding the statement, however replace reference to the “Water Advisory Council” with “County”.</p>	
B.7	<p>Add New:</p> <p>(14) The Water Advisory Council shall be charged with reviewing current practices in determining when housing developments shall be required to provide public water supplies and when they may utilize unmonitored private wells.</p>	<p>It is not clear that there is a problem or issue with the current practices. Recommend not include this item.</p>	X
B.7	<p>Add New:</p> <p>(15) The County recommends that owners of artesian wells obtain modern caps that offer a</p>	<p>Reword the addition as follows: (15) All artesian wells should be capped with a</p>	X

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	artesian wells obtain modern caps that offer a secure sealing of the well head.	secure seal to prevent contamination. The County in cooperation with the Health Department should initiate a program to ensure this occurs.	
B.7.(i) (2)	<p>Add the following:</p> <p><i>Upgrade the current Reedville Sewerage Plant to reduce Nitrates to as near state of the art as feasible (3 mg/liter?) Monitor effluent at both/all plants to insure that minimum pollution if introduced into our waters</i></p>	<p>The Reedville Plant is currently being evaluated as part of a State requirement to reduce nitrates and will be upgraded as required by the State. The effluent is currently being monitored.</p> <p>Therefore, no addition to the Plan is necessary.</p>	X
B.7 (i)(5)	<p>This sentence states: "Increase the knowledge of citizens concerning the advisability of testing individual wells on a regular basis."</p> <p>How often? (Once a year??) Is the testing interval different for shallow wells vs artesian wells? (I would suspect you would want to test shallow wells every year, maybe artesian every other year????)</p>	<p>The questions are valid and should be addressed in the methods chosen to "Increase the knowledge..."</p> <p>This item should be addressed in Chapter 6, Implementation.</p> <p>No change in this item is warranted.</p>	
B.7 (i)(5)	Recommend delete this item.	See comment above. It is deemed beneficial to provide information regarding testing.	
B.7 (i)(6)	<p>This sentence states: "Establish specific policies for the handling and disposal of hazardous materials and for seepage from large trash piles."</p> <p>"and for seepage from large trash piles" was added. Large trash piles are illegal. As far as I</p>	<p>The addition was made at the request of the Health Department and should remain.</p> <p>Any resulting policies would be expected to define "large trash piles" and address the legality and DEQ role.</p>	

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	<p>know there are no (active) permitted landfills in Northumberland County. If there are large trash piles, we need to notify DEQ about them. I think this addition is unnecessary.</p>		
<p>B.7</p>	<p>Add New: (Note these are “policies for providing an adequate supply of potable waters.” The headings in Bold are the recommended re-structuring of the section.)</p> <p>b) Water Quantity: Protection of Supply Availability</p> <p style="text-align: center;">Surficial Aquifer</p> <p>Because conventional wells are supplied by the infiltration of rain and snow melt, they are a renewable source of water. Protection and preservation of these wells is an important part of insuring that water will be available to future generations in the county.</p> <p>There are many older wells remaining in the county which were hand dug. During times of drought these wells may run dry whereas wells dug by machine have proven to be successful even during drought.</p> <p>(1) To this end the County prohibits the installation of hand dug wells and requires well drillers to provide enough depth in a well to allow an adequate water supply when the water table drops and to inform the owner and the Health</p>	<p>Recommend add these items.</p>	

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	<p>Department of the amount of water in a newly dug well.</p> <p>(2) Any well driller failing to submit the required state well completion form to the Health Department within the time frame allotted by state regulations shall be reported to the Department of Professional and Occupational Regulations.</p>		
B.7	<p>Add New (Continuing from comment above)</p> <p>Artesian Aquifers</p> <p>Because our artesian aquifers are rapidly being drawn down by industry and suburban development outside our region, particularly the Middle Peninsula and Southern Maryland, it is imperative that the county provide a well researched and coordinated effort to insure that drinking water will be available to future generations. Two members of the Rappahannock Aquifer System—the Bright Seat and the Upper Potomac aquifers--do not have a land surface source for recharge. [Excessive] draw down of these aquifers can have catastrophic effects for Northumberland County.</p> <p>(3) A Water Advisory Council shall be appointed to assist the Planning Commission in identifying solutions to the decline in groundwater levels in the artesian aquifers. The council shall identify potential partners in implementing those</p>	<p>As stated above for water quality; the Water Advisory Council is a good idea. However, because of the common problems across the Counties of the NN, it should be a component of the NNPDC. Northumberland County would be pleased to support its activities.</p> <p>Recommend reword (3) as follows:</p> <p>“(3) The NNPDC in cooperation with the Planning Commission shall work to identify solutions to the decline in groundwater levels in the artesian aquifers. The council shall identify potential partners in implementing those solutions and recommend structured liaison with partners including the Virginia Department of Environmental Quality and the Virginia Department of Health.</p>	X

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	solutions and recommend structured liaison with partners including the Virginia Department of Environmental Quality and the Virginia Department of Health.		
B.7 near end of Section	<p>“Policies for providing an adequate supply of potable water are as follows:” Replace paragraph (a) with the following:</p> <p>(4) A groundwater withdrawal plan shall be submitted as part of the documentation for new subdivisions and commercial places, and such plan shall have the approval of appropriate state agencies. Public hearings may be required for commercial operations at the discretion of the County Planning and Zoning Administrator or by state agencies.</p>	Add the reference to public hearings as recommended. Note that this entire item will be reviewed as part of the State mandated water supply plan.	X
B.7	<p>Add New – Groundwater – shallow aquifer</p> <p><i>Set up a shallow aquifer monitoring system of at least 12 county shallow well sites to detect nitrate, agricultural chemicals, and other concerning toxics. Develop test protocols and Lab Services as required to administer appropriate shallow well testing. Measure (to protect humans) at least as often as the Health Department currently monitors our streams to protect shellfish</i></p>	<p>The need for such a monitoring system will also be evaluated as part of the Water Supply Plan.</p> <p>The recommendation raises issues of cost, responsibility, effectiveness and the like.</p> <p>Further study is needed.</p>	X
B.7	Add New – Artesian Water – deep Aquifer	There currently are monitoring stations in Montross and in Kilmarnock that are used to gather deep	X

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	<p><i>Set up a monitoring system on the well (to be driven) for the new Middle School, to monitor well water depth and the level sodium/saltwater intrusion. Develop test protocols and Lab Services as required to administer appropriate deep aquifer testing. This will provide an early detection system providing an indication of deep aquifer health.</i></p>	<p>aquifer data. It is agreed a monitoring system on a new well at the Middle School is needed and should be incorporated into the planning. The current type of testing and frequency being performed at Montross and at Kilmarnock should be evaluated as part of the Water Supply Plan to ensure that adequate data are collected and made available.</p>	
<p>B.7 Pg 5:10</p>	<p>Add New:</p> <p>Reservoirs</p> <p>(5) Because a water shortage is likely in the near future, the county will plan for reservoirs including selection of sites and develop plans for their protection from potential sources of contamination.</p>	<p>Recommend reword as follows:</p> <p>(5) Because a water shortage is likely in the near future the County will plan for reservoirs as one of the sources of potable water. Current recommended sites will be protected from potential sources of contamination.</p>	
<p>B.7 Pg 5:10</p>	<p>Add new:</p> <p><i>Bring at least one community reservoir on line during the planning period to acquire the experience required to expand the system as the deep aquifer gives out.</i></p>	<p>Reword as follows:</p> <p>The County should develop a detailed economic and financial plan and schedule to bring at least one of the five proposed reservoirs on line in the 2010 – 2015 time period. This will provide the ability to expand the system of reservoirs as the supply from the current deep aquifer is depleted or before the aquifer collapses.</p>	<p>X</p>
<p>B.7</p>	<p>The Plan should seek diversity in the water supply; include shallow-wells, desalinization, reservoirs and</p>	<p>Accept the addition</p>	

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	deep aquifers as sources.		
B.8 – B.13	The Plan should clearly distinguish between saltwater and fresh water policies and plans.	Modify the structure and headings as recommended	
B.8	Second sentence- change as noted below: "The protection of the Bay is served by reducing the amount of runoff and groundwater discharge from development. "	The requested change is restrictive and would exclude agriculture and other sources. Recommend not incorporate it.	
B.8.	Watershed Protection. First paragraph. Change 3 rd sentence: "...consequently fewer pollutants entering the Bay by maintaining a 100 foot RPA."	Accept change, more accurate statement	
B.8.(c) And B.12.(d)	Storm water runoff is mentioned, as it relates to being intercepted by the riparian buffers. This is good, however, it is much better to REDUCE storm water runoff in the first place, and promote infiltration of storm water into the ground instead of conveying it off site. This is the principal of Low Impact Development (LID). A description of LID and its application needs to be in the Comp Plan, as it is a concept to develop with minimal impact to the environment and water quality..	Add a reference to LID and a brief description as recommended	X
B.8 (?)	Add new item: Develop test protocols and Lab Services as required to administer appropriate tidewater testing.	The Tidewater Resource Conservation and Development Council (RC&D) is currently initiating such a testing program for the Great Wicomico. The Staff concurs with the recommendation and will include the recommendation for an expanded program in the Comp Plan.	
B.9	Add at the end of the third paragraph on dunes:	Concur in the addition.	

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	<p>"Dunes also are important habitat for many species and should be preserved in their natural state. Secondary dunes are also important, in case of depletion of the primary dunes; they become the first line of defense from erosive storm surge. Secondary dunes should also be preserved intact as much as possible."</p>		
B.12.	<p>Managing Potential Conflicts Between Land Use and Water Quality Protection</p> <p>Comment: It has been known for over 30 years, since the first ACOE study of Chesapeake Bay, that agricultural practices are the major source of pollution of the Bay. In our setting, with little or no urban runoff and wastewater treatment plants, it constitutes most of the nitrate and phosphate pollution of our local waterways. The hard cold fact is that unless significant changes take place in agricultural practices there will be no significant improvement in water quality in our local waterways. We should continue to encourage homeowners to do all they can to reduce pollution, but we cannot continue to let agriculture off the hook.</p>	<p>Agree with the comment, Modify 12 (a) to include the following as the third sentence: "It has been known for over 30 years, since the first Army Corps of Engineers study of Chesapeake Bay, that agricultural practices are the major source of pollution of the Bay. In our setting, with little or no urban runoff and effective wastewater treatment plants, it constitutes most of the nitrate and phosphate pollution of our local waterways."</p>	X
B.12 (a)	<p>Change starting with the 3rd sentence as shown in bold:</p> <p>"...Future uses can be reduced through use of Best Management Plans, erosion control plans, nutrient management plans, and integrated pest management plans. Best Management Practices, and the</p>	<p>Add the changes through the phrase "...must be enforced." Do not include reference to "more draconian measures..."</p>	X

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SECTION	COMMENT/INPUT	STAFF COMMENT	PC
	<p>establishment of permanent forested buffers in Bay Act RPAs must be enforced and more draconian measures, such as banning the use of animal waste as fertilizer or returning agricultural land to forests may be necessary.</p>		
B.12 (b)	<p>Modify the paragraph as shown in Bold: “On-site sewage disposal for residential and limited commercial use, if not properly installed and maintained, can result in both contamination of ground water and in case of extreme failure, of raw effluent being carried via runoff to creeks which flow to the Chesapeake Bay. The Bay Act requirement to inspect septic systems and pump septic tanks every five years, if necessary, must be enforced and will help improve groundwater quality. The Health Department issues all sewage disposal system construction permits and inspects them. This, in general, is focused on new construction which, along with the time of property transfer, is the best time to initiate new requirements.”</p>	<p>Add the recommended changes except the phrase: “..., if necessary, must be enforced and”</p> <p>It is recognized that the 5-year pump out is a requirement but enforcement at this time is a goal only, until provisions for accommodating the septage are in place.</p>	X
B.12 (b)	<p>The changes in this paragraph and rewording re inspection of septic systems should be more direct and less wishy-washy. The following is recommended:</p> <p>"Regular 5-year inspection of all septic systems to correct any deficiencies in their operation, and tank pump-out if necessary, is required."</p>	<p>Agreed it is “wish-washy”. See comments above and below.</p>	
B.12 (b)	<p>A regional septage disposal system should be proposed as a solution to the problem of individual Counties in the NN not having adequate disposal capability.</p>	<p>Agree to add to the Plan. This is necessary before the 5-year inspection requirement can be enforced.</p>	
B.12 (e)	<p>New Item:</p>	<p>Add the item as a closing paragraph for B.12, (not</p>	X

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	<p><i>As a County, we need to do a better job of providing information to our residents about what it means to protect water quality and what the implications are for each homeowner. To this end, it is recommended that a pamphlet/DVD be published that is “required” reading or listening for all applicants for building permits. This action will also be at least a partial answer to CBLAB’s requests for more Bay protection.</i></p>	<p>an item (e) and reword as follows: “It is important for the County to provide information to the residents about various means to protect water quality and how each property owner can contribute. Each of the four areas above should be addressed as a minimum and could be distributed in conjunction with approval of building or land disturbance permits.”</p>	
C.2	<p>Reword the first sentence for clarity: “Chesapeake Bay Act The Resource Management Area Regulations: The strategy in the RMA (all area not in the RPA which includes the remainder of Northumberland County) is to allow....”</p>	Accept the change	
C.5.(f)	<p>New item Although more a safety issue than a water quality issue, the County should continue to actively publicize and enforce the requirement that all abandoned wells be capped.</p>	Accept	
D. Implementation Strategies	<p>Public comments were provided on certain items that will be part of the new Chapter 6. <i>Implementation</i>. These will be addressed at that time.</p>		
Comp Plan	<p>Recommendation: <i>A NEW section should be added to the plan to</i></p>	<p>This recommendation will be considered for inclusion in Chapter 3, Land Use Planning where villages are discussed.</p>	

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	<p><i>focus on Village Infrastructure. This section should focus on parking, roads, sewage, fire protection, internet availability, and any other infrastructure needs that encourage village development.</i></p>		
Other Chapters	<p>Comments were provided on areas of overlap with other Chapters. (Chap 1 and 2) These comments all appear to be corrections to the text in the other chapters to provide consistency and are not policy changes. They will be incorporated as recommended.</p>		

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