



Nickel / Shanks

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Tidewater Administration

December 16, 1982

Mr. Kenneth E. Shanks
Division of Planning
Office of Environmental Programs
Department of Health and
Mental Hygiene
201 West Preston Street
Baltimore, Maryland 21201

Re: Draft 208 Plan for the
Patuxent River Basin

Dear Mr. Shanks:

The Water Resources Administration (WRA) has coordinated review of the September 16, 1982 draft of the above referenced plan for the Department of Natural Resources (DNR). We note that earlier comments have been incorporated into the Plan.

In summary, the Plan has adequately consolidated and analyzed the pertinent available information on water quality and related fisheries aspects for the Patuxent River Basin. If fully implemented, the Plan should result in significant incremental improvement of presently degraded fish and aquatic life habitat in both the tidal and non-tidal portions of the river. Some additional attention to land application of sewage effluent relationships with minimum flow for fisheries would improve the Draft Plan.

We note that the policy in the Draft Plan is derived directly from the Office of Environmental Programs Nutrient Control Strategy finalized earlier this year and is based to a large extent on the goals and recommendations that arose from the Patuxent Charrette held in late 1981. The Draft Plan appears to mesh well with the findings of those portions of the draft Final Report of the Environmental Protection Agency Chesapeake Bay Study available to us.

There remain, however, two statements in the Plan that are inconsistent with the July 1980 consolidation of environmental programs. These appear on page VII-1 and VIII-3. Specifically, consolidation did not make the Office of Environmental Programs (OEP) solely responsible for management of water quality nor limit the DNR role to management of water quantity. The 1980 Executive Order is more