

Fort Howard Community Association, Inc.

9202 Howard Avenue
Fort Howard, Maryland 21052
410-477-2040
December 15, 2018

Mr. Keith Taylor, President
Sparrows Point/North Point Historical Society
9200 Howard Avenue
Fort Howard, Maryland 21052-0432
Ktaylor72@verizon.net
410-913-4161

Re: Historic Penwood Fields

Dear Mr. Keith Taylor,

Regarding the efficacy of the Penwood Fields for recreational usage: please be advised ATC Associates Inc., prepared for Baltimore County Department of Environmental Protection and Resource Management a Subsurface Investigation Report for Bethlehem Steel Plant-Site 3A at Sparrows Point Boulevard, Sparrows Point, Maryland 21219 titled: ARTC Project Number-17348.00001 in January 1999.

Prior to this work, Schnabel Engineering performed a Phase I Environmental Site Assessment (SEA Reference Number 974051.CE) for Sites 3A and adjacent Site 3B, in general conformance with the scope and limitations of ASTM E-1527-97 (attached), at the same location for the same agency, Baltimore County Department of Environmental Protection and Resource Management in April 1998.

Both studies investigated the 104 acres of Site 3A, historically known as the "Penwood Fields." Since the closure of the former steel plant in 2014, recreational land usage with the improvement of a regional recreational facility constructed at Site 3A has been purposed to accommodate the decades long underserved communities of Lynch Point, Lodge Forest, Lodge Farm, Todd's Farm, Denton Avenue, Penwood Terrace, Millers Island, Shaws Discovery, Bauers Farm, Jones Creek, Cedarcrest, Well-McComas, Edgemere, Battle Park, Sparrows Point, and Fort Howard and to provide capacity for population growth that both Baltimore County Department of Planning, Inspections, and Approvals and Baltimore County Public Schools have projected in the Baltimore County Government 2020 Master Plan and the 2018 Baltimore County Public High School Capacity Study, respectively.

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Schnabel's 1998 report concludes quote,

“Upon evaluating the available data, we conclude that the completion of the following recommendations will cause the site not to pose a significant environmental risk:

- Prior to redevelopment, a wetlands delineation should be performed to verify the presence and extent of regulatable wetlands on the site.
- Prior to redevelopment of the site, the debris should be removed for proper off-site disposal. The roofing shingle on Site 3A should be tested for asbestos prior to disposal.
- Prior to redevelopment of the site, Bethlehem Steel should remove the Chlorine/Oxygen Scavenger and oil skimmer unit for the site.”

ATC Associates Inc., 1999 subsurface investigation report at Site 3A concludes quote,

“No VOCs or SVOCs were detected in the soil or groundwater samples....metals concentrations in the on-site soil and ground water with the Risk Based Concentrations developed by EPA for metals in industrial soils and tap water, the Site contained elevated levels of arsenic in the soil and elevated levels of arsenic, nickel, and lead in the ground water, **however, according to literature arsenic can occur naturally in concentrations that exceed RBC values and the arsenic levels detected in the soil should not be a potential for future development.**

The industrial RBCs are based in soil ingestion which is not expected to a major concern since the recorded concentration were taken at a depth of 3 feet below ground surface.

Assuming that the potable water source for development will be municipal, **the RBC and MCL exceedances for tap water are irrelevant.”**

Historically, during the mid-20th century the 104 acre was the site of the Sparrows Point Bethlehem Steel company town used exclusively for residential housing and ballfields, consistent with the current purposed recreational land usage. Attached is photographic evidence of previous recreation usage of the Site.

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Environmental records reveal since the razing of the company town in 1973 activity at the site has remained dormant.

Diary of a Mill Town: Recollections of the Bungalows and Sparrows Point, Maryland by Elmer <http://forthoward.org/penwood-field-letter/town>, the bungalows, the schools, churches, the recreation ball fields and the “Steel Bowl,” at Site 3A and 3B. The video narration closes with “Everything you see in now history.”



<https://youtu.be/dWS5u30W-u0>

Although it is beyond the scope of this letter to comprehensively address the four hundred years of national historicity, Site 3A and 3B are the last 100-acre remnant of the original environmentally unchallenged Thomas Sparrows' colonial American 1652 settlement. Site 3A and 3B are representative of the 20th century industrial and maritime goliath “Steel Mill that Built America,” and the Site is the current location of the National Register of Historic Places Cut-Off Channel Range Rear Light of Penwood Wharf.

Of additional historic noteworthiness, Site 3A and 3B forms Historic Old Road Bay's west shore-line. The communities of Jones Creek and Lodge Forest form the north shore-line and the communities of historic Todd's Farm and historic Fort Howard form the east shore-line.

Todd's Farm is the third oldest continuous working farm in the United States. The farm and its original farmhouse, still family occupied today, is listed on Maryland Historic Trust (MHT) Inventory of Maryland historic places and is owned and curated by the Maryland Department of Natural Resources' (DNR) Residential Curatorship Program.

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Fort Howard's Old Road Bay shore-line is the historic beachhead of the British expeditionary force during Britain's September 14, 1814 naval and land assault on Baltimore in the War of 1812. This assault inspired Baltimore lawyer Francis Scott Key to write his poem Star Spangled Banner which is today's National Anthem words. No effort can be spared restoring and preserving this most unique historic setting of American, and Baltimorean, naval war history. The historicity of Site 3A and 3B cannot be overemphasized.

Likewise beyond the scope of this letter to be comprehensively addressed, Old Road Bay's economic impacts should at least be noted. Old Road Bay's north and east shore-lines are lined with rural, historic, Chesapeake Bay single homes with their attending boat piers nestled in the most celebrated waterfront communities of south-east Baltimore County. These homes are appraised for tens of hundreds of thousands of dollars.

However Old Road Bay Site 3A and 3B west shore-line's visage cannot be more inconsistent and incompatible with the bucolic east and north. The west shore-line industrial visage negatively impacts Old Road Bay's historic, rural, Chesapeake Bay continuity and community sense of place, psychologically depresses onlookers. When compared with similar Chesapeake Bay waterfront homes Old Road Bay waterfront homes suffer a significant market devaluation and Baltimore County's property tax base suffers accordingly. The industrial visage diminishes Maryland's treasured Chesapeake Bay contextual historic cultural and naval Old Road Bay view-shed and general quality Maryland Chesapeake Bay life.

Based on the high probative value of ATC Associates Inc. and Schnabel Engineering's investigation data and conclusions that Sites 3A and 3B are suited for the proposed recreational usage and recreational facility improvements and other considerations, it is reasonable and prudent at this time to pursue a memorandum of understanding between all stakeholders including but limited to Baltimore County Government, Baltimore County Public Schools, Redwood Capital Investment DBA/Trade Point Atlantic, Millers Island Business Association, Miller Island Civic Association, the 7th District Civic council of Baltimore County, Sparrows Point/North Point Historical Society, the Baltimore County Historic Trust, and the Fort Howard Community Association, to secure Site 3A and 3B for the decades long underserved taxpaying communities mentioned above until such time additional investigation(s) indicate Sites 3A and 3B are environmentally unsuitable for any said proposed recreational usage and recreational facility improvements.

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Additionally, it is recommended a visual screen be created by landscaping the west shoreline with evergreens. This solution has been proposed directly to our "neighbor," for over two years and must be an element included in any discussions.

Fort Howard Community Association continues in its mission to preserve, maintain, or enhance the rural, historic, small town, Chesapeake Bay character of Fort Howard, Maryland by advocating for the underserved residents of Fort Howard and preservation of Baltimore County's eastside community's historical, cultural, industrial, and natural heritage.

Most respectfully yours,



Scott Pappas
President, FHCA

"It's our community, let's take care of it."

Attachments: (11)