
Re: CR19-2026 submitted written testimony

From Mike J. McCann <mike.mccann@fcc-eng.com>
Date Wed 1/28/2026 7:58 AM
To CouncilMail <CouncilMail@howardcountymd.gov>
Cc Mike J. McCann <mike.mccann@fcc-eng.com>

 1 attachment (231 KB)

Letter of Support with Amendments CR19-2026 v2.pdf;

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Good morning!

Please accept the attached written testimony supporting with amendments CR19-2026. Please confirm your receipt of the attached testimony.

Should you have any questions or wish to discuss in greater detail, please contact me at your earliest convenience.

Best regards-

Mike

Michael J. McCann, Principal

FISHER, COLLINS AND CARTER, INC.

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Ellicott City, MD 21042

410-461-2855



FISHER, COLLINS & CARTER, INC.

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January 23, 2025

The Honorable Opel Jones
Howard County Council Chair
3430 Court House Drive
Ellicott City, MD 21043

**RE: Letter of Support with Amendments CR19-2026 Adopting Comprehensive Revision –
Landscape Manual**

Dear Council Chair Jones,

Fisher, Collins and Carter, Inc. (FCC), located and working in Howard County for our entire 48-year existence, appreciates the opportunity to participate in the discussion surrounding **CR19-2026 Adopting Comprehensive Revision – Landscape Manual**.

While we generally support the passage of the updated Landscape Manual, we would like the Council to seriously consider amending Chapter 2 of the Manual to continue allowing Licensed Professionals (professional landscape architects, professional civil engineers, professional land surveyors; herein defined as “Licensed Professionals”), licensed by the State of Maryland to sign and seal landscape plans. Licensed Professionals, from our firm and almost every other firm working in Howard County, have successfully prepared and sealed landscape plans as part of subdivision and site development plans for many decades now with no issues. For this entire period of time, there has been no record of safety issues or environmental harm resulting from landscape plans prepared by any Licensed Professional, nor is there any demonstrated public benefit from this proposed and restrictive change. This is simply a duplicative regulatory hurdle by requiring an already allowed Licensed Professional to sign and seal plans, while removing the long-standing ability of other Licensed Professionals, without reducing and/or removing any existing review or approval steps. Furthermore, if the draft Manual were revised to include Licensed Professionals as we suggest, it does not in any way alter the requirement of said Licensed Professional to meet the technical requirements and the framework of the Landscape Manual. Licensed Professionals in the State of Maryland design grading, stormwater management, utilities, landscaping and site layouts, among many other items. Their work directly determines whether landscape plans are compliant with County Codes. As with the SWM Design Manual, the determination of professional qualification remains with the design professional certifying the plan. In our professional opinion, we believe that making this change to limit the ability to sign and seal landscape plans to only landscape architects will produce no public benefit, promotes only the use of one licensed professional over other Licensed Professionals who must remain active participants in the Howard County process, and is wholly unnecessary.

We also recommend amendment to other portions of the Landscape Manual, as follows:

Accessory Dwelling Units (ADUs)

ADUs should not be subject to Landscape Manual requirements as they are owner-initiated improvements on existing residential properties. Applying full or partial landscape plan requirements to ADU's creates unnecessary cost and delay for individual property owners and is inconsistent with intent to allow ADU's a streamlined, by-right use.

Bee City Program

Requiring plan notes referencing the Bee City Program adds unnecessary documentation to landscape plans and increases review burden. Pollinator-supportive planting is certainly valuable, but these notes are not essential to the core landscape plan and will be rendered obsolete when program requirements change. This requirement should be removed to maintain clarity and flexibility of the Manual.

Open Space Planting

The new Manual references planting within open space areas, whereas the previous version did not explicitly include this. This change is unnecessary because open space should remain functional for recreation and community use, and mandatory internal tree shrub planting could limit usability for activities like sports, gatherings, or other flexible uses. Plantings should be optional and native plant requirements can apply only where plantings are provided consistent with the intent of supporting biodiversity, without restricting open space function, and with consideration to potential programming.

Landscape Edges and SWM

The new Manual adds a requirement for landscape edges around SWM facilities, whereas the previous Manual did not. This change is unnecessary because the perimeter planting of SWM areas is already regulated and reviewed by DED in conjunction with the SWM review. Duplicating these requirements in the Landscape Manual creates County-internal review conflicts, and also increases review burden unnecessarily.

Easement Crossings

The new Manual requires easements to cross landscape edges only perpendicularly whereas the prior Manual had no restriction. This change is unnecessary because easement placement is determined by the existing conditions, engineering, grading, and utility requirements, not landscape design. Forcing perpendicular crossing will conflict with site conditions, limit design flexibility, and create unnecessary review burden. Instead, the Manual should focus on ensuring that required plantings are not located inside of, or within a specified distance of, utility and/or drainage easements, without dictating the angle of crossing.

ESD Facilities Reference

The reference to “ESD Facilities” should be removed to avoid duplication of stormwater regulations already in place.

In conclusion, the recent housing report released by Comptroller Brooke Lierman states that regulation accounts for 25% of the total cost of a new home, and Maryland is the 6th most regulated state for housing development. Added regulations, such as the points described herein, are exactly what the Comptroller is trying to address in her report. Mandating that only a licensed landscape architect can sign and seal a landscape plan, when Licensed Professionals, including landscape architects, have had the ability to sign and seal these plans for decades does nothing but add layers of review complexity, increase consultant fees, increase coordination time, plan revisions and resubmissions. Unfortunately, homebuyers ultimately absorb these added costs. Unless there is a clear issue or threat to safety and there is a clear public benefit, which there is not in either case, we should not be adding more obstacles to responsibly building homes. The State of Maryland is already in a housing crisis and adding more regulatory hurdles will continue to make housing unaffordable.

For these reasons, FCC respectfully requests the Council to amend **CR19-2026 Adopting**

Comprehensive Revision – Landscape Manual. If you would like to discuss our positions in more detail, please contact Mike McCann at 410-461-2855 or mike.mccann@fcc-eng.com.



January 26, 2026

George Howard Building
3430 Court House Drive
Ellicott City, MD 21043

RE: CR19-2026

Members of the County Council,

The Howard County Sierra Club is in support of passing CR19-2026 adopting a comprehensive revision of the Howard County Landscape Manual. This comprehensive revision has included the input from many organizations that have made important recommendations to benefit wildlife and the environment.

Requirements for native plants and biodiversity are extremely important for supporting wildlife and contributing to better stormwater management. Native plants are also more resilient and require less resources to maintain with regard to water and pesticide use.

Equally important, this plan addresses the restriction of planting invasive plants. Invasive plants can spread into wild areas and crowd out native species. These plants can incur high costs to remove them from wild areas or other neighboring properties where they are not wanted. Using "Invasive Species of Concern in Maryland" by the Maryland Invasive Species Council as a reference to determine if a plant is invasive should serve as a comprehensive guide to keep invasive plants from being planted in the County. The Maryland Department of the Environment's website "Maryland Invasive Plants Prevention and Control" lists far fewer plants as invasive and should be considered a secondary reference until such time that more species are evaluated and added to the list. These additional evaluations will be upcoming as they were set into place by Senate Bill 915 passed on June 1, 2024.¹

We recommend that recommendations for the density of trees stay the same as the previous manual. Planting trees is extremely important for supporting wildlife, sequestering carbon, enhancing shade and privacy. The tree planting recommendations should not be decreased from the previous version. It is important to be sure that this issue is addressed.

¹ https://mda.maryland.gov/plants-pests/pages/maryland_invasive_plants_prevention_and_control.aspx

There was no requirement within the manual for street trees to be native plants. The Sierra Club strongly supports the addition of this requirement. There was a reference in the manual to a separate list of recommended street trees that would be used. This list should be made up only of native trees.

We respectfully ask you to strengthen the requirements for native plants, either through amendments to the manual, or by policy changes which update the lists of recommended plants.

Carolyn Parsa, Chair
Howard County Sierra Club
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