



Maryland Department of Planning

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Governor  
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Lt. Governor

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Secretary  
Matthew J. Power  
Deputy Secretary

Mr. Arnold F. 'Pat' Keller, III  
Director  
Baltimore County Office of Planning  
105 West Chesapeake Avenue, Suite 101  
Towson, Maryland 21204

August 27, 2010

Dear Mr. Keller: *Pat*

The Maryland Department of Planning has completed the coordinated review of the draft Water Resources Element for Baltimore County dated June 14, 2010. The draft element was sent to the Maryland Departments of Transportation, Environment, Natural Resources, Business and Economic Development, Housing and Community Development, and Agriculture. Comments received after the date of this letter will be forwarded to you upon receipt.

In addition to the requirements of HB 1141, our planning staff has reviewed the elements for consistency with the Planning Act of 1992, the Smart Growth Areas Act of 1997 and other State growth management principles and policies. Our review comments are attached for your consideration.

If you have any questions please feel free to contact me at (410) 767- 4500 or Steve Allan at (410) 767-4572 with any questions or concerns.

The Maryland Department of Planning looks forward to continued planning coordination with Baltimore County.

Sincerely,

Peter Conrad, AICP  
Director, Local Government Assistance

Enclosure: Review comments

cc: Jason Dubow, Planner, WRE Coordinator  
Steve Allan, Regional Planner  
Rich Josephson, Director, Planning Services  
Rita Elliot, MDP Clearinghouse



**Maryland Department of Planning**  
**Review Comments**  
**Baltimore County Water Resources Element**  
**August 27, 2010**

The WRE is very close to completion, but would meet the requirements of HB1141 with recommended comments. The most important comments to include are in **bold**. The WRE does not yet effectively address the following purposes of the law and/or State guidance, as follows:

- For each watershed, identify current WWTP discharge locations and loads (MDP M&G 26, p. 12).
- Does the WRE make findings that address estimated changes in both point and nonpoint nutrient loads (MDP M&G 26, pp. 39-40).

Overall WRE comments:

- The Master Plan indicates that the WRE is incorporated as part of the Master Plan (Master Plan 2020, p. 24). The WRE (and not just the WRE executive summary) should be adopted as part of the Master Plan.
- The County should be commended for:
  - including a WRE that examines multiple possible land use scenarios (p. 27) and a Master Plan that chooses the least impactful land use plan examined by the WRE with regard to both nutrient loading and impervious surface (Master Plan 2020, p. 24).
  - recognizing in its WRE that all new development impacts must be offset (pp. 17, 27) and including a policy to investigate the feasibility of an offset program (p. 55).
  - using the WRE as a preliminary assessment to determine whether local and Chesapeake Bay TMDL allocations can be met, in part through the proposed land use plan (pp. 27-28, 39).
- **The County should include a forecast on how future water and sewer demand would change given the WRE's recommendation of a land use plan that focuses on redevelopment within the URDL.** The water and sewer demand forecast (p. 5) appears to be based on the County's current land use plan. An alternative land use plan that focuses on redevelopment likely will increase demand for public water and sewer above current forecasts. If the County believes that the water and sewer demand forecast provided in the WRE adequately captures expected demand under the alternative land use scenario (i.e., redevelopment within the URDL), then the WRE should clarify that this is the case.
- The County should review its Land Preservation, Parks, and Recreation Plan and identify measures that will implement the Water Resources Element strategies. Referral of these relevant sections within the Land Preservation, Parks and Recreation Plan should be cited within the Water Resources Element.
- SB276, passed in the 2009 Maryland legislative session, sets a statewide land use goal of increasing the current percentage of growth in Priority Funding Areas (PFAs) and decreasing the current percentage of growth outside of PFAs. SB276 also requires local governments to develop

a percentage goal towards achieving the statewide goal. Although the new annual report requirements (including the local land use goal) under SB276 will not be filed until July 1, 2011, Baltimore County should consider (and discuss) whether its estimates of the percentage of growth to be served by public water and sewer will be sufficient to achieve the statewide land use goal. Statewide in Maryland, the current (as of 2006) percentage of growth in PFAs (not including “comment areas”) is 68%

[http://www.mdp.state.md.us/msdc/PFA/Resid\\_Growth/by\\_County/PFA\\_cnty\\_index.htm](http://www.mdp.state.md.us/msdc/PFA/Resid_Growth/by_County/PFA_cnty_index.htm).

- Please consider the following edits to add clarity:
  - There is a possible typo (p. 2) where the text refers to the county’s population rate as decreasing to “3,900 people per year in the near future.” To add clarity the text could use the 3,800 figure found in the chart for 2020 annual change in population.
  - The list of appendices (p. 6) is confusing because it does not refer to the appendices within the WRE. The WRE should clarify where these documents are located and/or assign them a letter not already used in the current appendix. For example, Appendix A is listed as the WRE Flowchart. However, Appendix A in the WRE is actually a technical memo on existing water quality conditions.

#### Comments on source water protection:

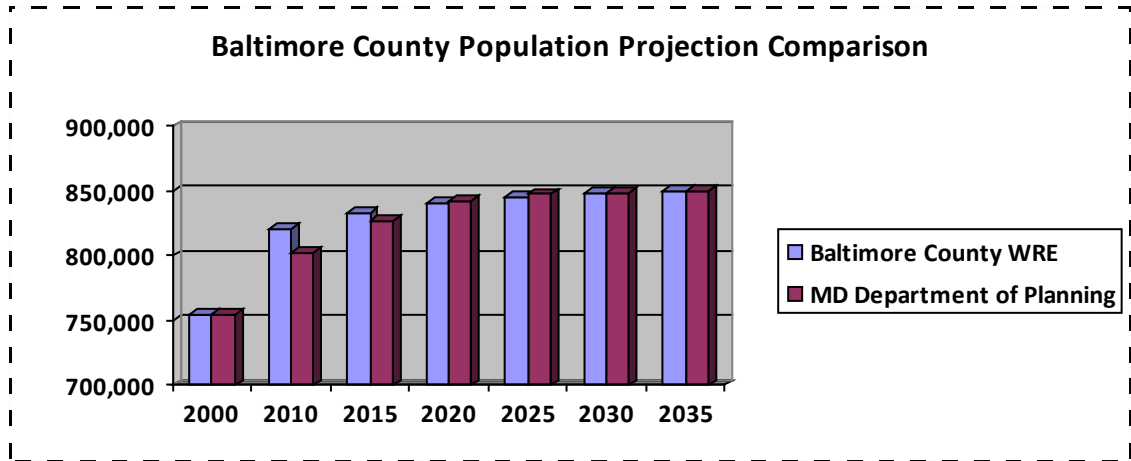
- The WRE could also include a few sentences regarding regional efforts to protect the Susquehanna River as a drinking water source since the County relies on the river in part for its drinking water needs.

#### Comments on identifying suitable receiving waters:

- **The WRE should provide a point source loading forecast for and indicate the discharge locations of the Patapsco WWTP, Back River WWTP and Richlyn Manor WWTP.**
- **The WRE should list the Maryland Tributary Strategy point source caps for the County’s WWTPs.**
- **The WRE also should provide a combined point and nonpoint source loading forecast.**

#### Comments on population projections:

The population projections in the WRE are suitable for planning purposes. The long range (2020 through 2035) population projections presented in the WRE are consistent with county level population projections prepared by the Maryland Department of Planning (MDP) for Baltimore County (See Chart 1).



The short range (2010 and 2015) population projections presented in the Baltimore County Water Resources Element are slightly high relative to Maryland Department of Planning population projections. This difference is due to our incorporating the slowdown in population growth over the last several years as documented by the U. S. Bureau of the Census' population estimates through July 1, 2009.

The time period displaying the highest difference is 2010 where the WRE projection is 18,774 persons above the MDP projection. This difference shrinks in 2015 with the WRE population projection higher by 6,888 persons. Both short term projections presented in the WRE represent a less than three-percent difference compared to the MDP population projections for the same years.

Other Comments on methodology:

The population forecasts provided in the Draft of the Baltimore County WRE are generally found to be in-line with MDP's historical and projected total population estimates for Baltimore County, last updated in December 2008.

The methodologies used to determine the household population distribution from TAZ and Census Tracts to WQPA's, the modification of 2002 MDP Land Use data to 2005 Land Use data, low density residential modifications and the population change analyses are thoroughly explained and generally well executed, thanks in-part to the concise diagrams and thorough discussions found throughout the WRE Technical Memo B.