



Maryland Department of Planning

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Deputy Secretary

October 4th, 2010

Mr. Steve Ball, Director,  
Dept. of Planning and Growth Management  
P.O. Box 2150  
La Plata, MD 20646

**Re: Charles County Water Resources Element**

Dear Mr. Ball: *Steve*

Thank you for submitting the Charles County Water Resources Element to the Maryland Department of Planning (MDP) for our review.

The attached comments discuss general comments and those which must be incorporated in order to meet the statutory requirements of HB1141.

Again, thank you for the opportunity to review and comment on this Plan. Please do not hesitate to contact me, Jason Dubow or Michael Paone at 410.767.4500 should you have any questions.

Sincerely,

*Peter Conrad*  
Peter G. Conrad, Director  
Local Government Assistance

Enclosure: Comments on the Draft City of Brunswick Water Resources Element

Cc: Jason Dubow, Planner, WRE Coordinator  
Michael Paone, Regional Planner  
Rich Josephson, Director, Planning Services  
Rita Elliot, MDP Clearinghouse  
File



**Maryland Department of Planning  
Review Comments  
Draft 2010 Charles County Water Resources Element  
October 4, 2010**

The WRE is complete and meets all of the requirements of HB1141. Please consider including the following comments to strengthen the WRE.

Overall Comments

- Charles County should be commended for providing the following in the draft County WRE:
  - Discussing in detail groundwater quantity issues, County activities to address these issues (p. 14), and policies for preserving groundwater quantity (pp. 15-18) and quality (p. 18).
  - Extensive investigation and initial implementation of wastewater reuse strategies (pp. 24-26).
  - Incorporating the Indian Head and La Plata Municipal Growth Elements (MGEs) into the Charles County WRE forecasts of future water and sewer demand and nonpoint source pollution (p. A-1).
  - Providing a thorough investigation of options for reducing wastewater discharge to surface waters, including applicability to specific Charles County facilities (pp. 25-28).
  - Investigating the potential for connecting septic tanks to WWTPs (pp. 27, 30) and examining the different septic tank loadings from proposed land use scenarios (p. 36).
  - Discussing the function of the County's stormwater NPDES permit in reducing pollution impacts (pp. 30-31) and the role and challenge of homeowners associations' maintenance of stormwater management facilities (p. 31).
  - Comparing the nutrient loading forecasts of three different land use scenarios to inform the County's proposed land use plan (p. 37).
  - Including cautionary notes with regard to the nutrient pollution forecast, specifically, that it should be used to compare different land use scenarios and is not precise enough to forecast actual loadings (p. 34), and as a result can only be used as a general guide with regard to TMDL implementation (p. 36).
  - Noting that the County will work to refine the nutrient loading forecast over time (p. 36) and will recalculate the forecast for the County's proposed land use plan (p. 43).
- Please add the following edits or resolve the following discrepancies in the WRE:
  - Section I, C. #8 (p. 2): the last words, "surface waters" should be changed to "potable water".
  - The following sentence is listed twice: "Water conservation is an often-overlooked, but critically important element of water supply" (p. 18)
  - There appears to be a text error on pages 4 and 6. The following text on p. 4 – "(outside of the DDD) would be subject to restrictions similar to those in the DDD. The County's Priority Preservation Area (PPA) would be part of this scenario, reducing" – should be switched with the following text on p. 6 – "(DDD)

would remain deferred (with permitted densities of one unit per ten acres) through 2030. New development in the portion of the Old Woman's Run Tier II catchment area".

- In Table 2 (p. 5), the three growth scenarios maintain identical housing unit totals (MDP projections). This seems illogical based on the parameters of the expanded development opportunities that each scenario would allow for. There is no discussion of lesser or greater development under each scenario.
- The County amended the 2006 Water and Sewerage Plan in 2009 to update its policies and procedures on the use of shared water and sewer systems for subdivisions greater than 5 lots. This WRE does not reference this policy but does acknowledge the important connection between the Comprehensive Plan and the Water and Sewer Plan. The shared facilities policy will serve the preferred development scenario.

Comments on identifying suitable receiving waters:

- The WRE could consider an additional land use scenario, specifically, the water quality impacts of land use patterns resulting from the Cross-County Connector project.
- The WRE's nutrient pollution forecast could look at impacts beyond 2030 given the high aquatic wildlife value of Mattawoman Creek and other waterbodies in Charles County and the additional development potential beyond 2030 within these watersheds.
- The WRE should note that Charles County adopted the Patuxent River Policy Plan (County Resolution 84-18) - <http://planning.maryland.gov/PDF/OurWork/PRC/OriginalPolicyPlan.pdf> - and the update to the plan (County Resolution 00-77) and that the County participates on the Patuxent River Commission to ensure implementation of the Plan - <http://planning.maryland.gov/OurWork/PatuxentRiverCommInfo.shtml>
- The WRE should note (p. 39) that the dispersal of development also impacts a greater number of waterbodies through impacts to a greater number of watersheds. For additional guidance on this issue, see EPA's *Protecting Water Resources with Higher-Density Development* at [http://www.epa.gov/smartgrowth/water\\_density.htm](http://www.epa.gov/smartgrowth/water_density.htm).
- With regard to wastewater reuse for cooling purposes at power plants (pp. 17-18), the WRE could include a sentence describing what happens to nutrients within the wastewater. For example, when treated wastewater turns to steam, are the nutrients deposited on machinery or is it emitted as air emissions?