Maryland Department of Planning

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Ms. Lauren Pruss,
Planning Director
City of Gaithersburg
31 South Summit Avenue
Gaithersburg, Maryland 20877-2098

December 23, 2009

Dear Ms. Pruss:

The Maryland Department of Planning has completed the coordinated review of the draft Gaithersburg Water Resources Element of the 2009 Master Plan. 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 plan 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. We also reviewed the draft Process and Overview element of the 2009 Master Plan, which we found to be a well thought out interpretation of the State's 12 visions.

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

The Maryland Department of Planning looks forward to our continued planning coordination with the City of Gaithersburg.

Sincerely,

Peter Conrad, AICP
Director, Local Government Assistance

Enclosure: Review comments

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

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Review Comments from the Maryland Department of Planning
Draft Water Resource Element 2009
City of Gaithersburg
December 23, 2009

Overview

The City of Gaithersburg has met the majority of the WRE requirements of HB1141; however, the WRE is incomplete. By addressing the following comments, the WRE will conform to the requirements of HB1141. The most important comments to address are in **bold**.

The WRE does not yet effectively address the following purposes of the law and/or State guidance as follows:

- Identify suitable receiving waters and land areas to meet the stormwater management and wastewater treatment and disposal needs of existing and future development proposed in the land use element of the plan, considering available data provided by the Maryland Department of the Environment (MDE) (Section 1.03(iii), Article 66B).

- The WRE should, for each watershed, calculate the total forecasted nutrient load, which includes nutrient loads from current and future wastewater treatment plant (WWTP) discharge, septic tanks, and stormwater runoff (MDP Models and Guidelines #26, page 13).

General WRE Comments:

The plan states that individual drinking water well systems and septic systems are "extremely rare" in the City, and, therefore, they are not factored into the WRE analysis. It would be helpful, however, if the plan included an approximate count of the number of wells and septic tanks currently serving residents. Also, please note whether there are any plans to connect any failing wells to the public water system or any septic tanks to the public sewer system as well as include the capacity needed to serve them. The plan could then discuss whether the private wells are susceptible to pollution and whether these might be included in future source water protection plans.

It would be helpful if the WRE listed recommendations to direct the City's future water resource management decisions based on the City's analysis of its water resources.

In sections 4.2 Drinking Water Projections and Analysis and 5.2 Wastewater Projections and Analysis, Table 3: WSSC Average Daily Water Use Factors and Table 6: WSSC Average Daily Wastewater Generation Factors compute the average demand on the Land Use Type Single-Family Dwelling Units, Multi-Family Dwelling Units, and Employees (Jobs). The Plan tells us that this analysis is based on average "jobs per acre". By looking at the data it appears that the Employee data indicates the demand generated by an individual at the job site. For example: the average daily water use in gallons per day by an employee is 51 gpd. This is somewhat consistent with the 231 gpd indicated demand for a single-family dwelling unit and the 209 gpd demand indicated for a multi-family dwelling unit. Consideration: The number of employees per acre may not be all the WRE should consider. For example: a car wash or restaurant will create a greater demand than an office even if they have the same # of employees per acre.

It should be noted that average daily wastewater flow shown in Table 6 for the single family dwelling unit is greater than the average daily water use for that same land use. It is not reasonable that more would be discharged as waste than taken in for use. The reason for this may be that the data comes from two different sources: the County Water and Sewerage Plan and WSSC Planning Group's Draft 2006 Wastewater Flow Projection/Demographic Analysis)

Comments on the water demand analysis include:

The City should be commended for its thorough discussion of water quality, demand, and capacity.

Comments on the proposed methods for protecting the City's source water include:

The plan states that the WSSC and MDE are a part of the Potomac Drinking Water Source Protection (DWSP) Partnership which works toward protecting drinking water sources. The plan also states that the Partnership is also identifying source water protection strategies as recommended by regional SWAs (p. 25).

Comments on the sewer demand analysis include:

The City should be commended for its thorough discussion of sewer demand and capacity issues.

Comments on the suitability of the receiving waters include:

The WRE should indicate the discharge points for the Blue Plains and Seneca Creek WWTPs.

The City should include a combined point source and non-point source pollution table for any portions of the City's receiving waters that receive both point and nonpoint source pollution from the City. Please add this to the plan.

The plan does not yet discuss the suitability of the receiving waters. Since TMDLs have already been established for phosphorous loadings in Clopper Lake, the City should use the TMDLs as a way to discuss the suitability of the receiving waters. For the City's other receiving waters, if there is insufficient information to determine suitability (e.g., no nutrient TMDLs), the WRE should indicate that this is the case.