



Maryland Department of Planning

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July 1, 2010

Honorable Robert E. Bruchey II
Mayor of Hagerstown
City Hall
1 East Franklin Street
Hagerstown, Maryland 21740-4817

Mayor Bruchey:

The Maryland Department of Planning has completed the coordinated review of the 2010 Draft Water Resources Element which will replace the Water and Wastewater Element of the 2008 Comprehensive Plan for the City of Hagerstown. Thank you for your participation in the plan review process. The State of Maryland is committed to fighting the high financial, social, and environmental costs of sprawl development through effective Smart Growth and Neighborhood Conservation strategies.

The Draft Water Resources Element is a good faith effort to address many of the required elements of HB 1141, however, we recommend that you consider our comments and further refine the components contained in the legislation. The attachment includes comments and recommendations from the MDP. Comments that appear in bold sentence or paragraph form require additional attention in order to strengthen the Plan. Please review our comments to ensure the Plans compliance with HB1141. Additional comments that may be forthcoming from other State agencies will be forwarded as we receive them.

Comprehensive Plans are strengthened when the local implementing tools reflect the visions and strategies of the plan. We recommend that within six months after adoption of the amendments to the comprehensive plan, the City review it's Zoning and Subdivision Ordinances for consistency with the plan. MDP would like to remain involved and updated on that process as it moves forward.

Thank you again for the opportunity to review the 2010 Draft Water Resources Element for the City of Hagerstown. If you have any questions and/or require assistance, please contact the review coordinator David V. Cotton at 301-777-2161.

Sincerely,

Peter Conrad

Director of Local Government Assistance

cc: Kathleen A. Maher, Planning Director
David V. Cotton, MDP Regional Planner

Review Comments from the Maryland Department of Planning Draft Water Resources Element (March 2010) City of Hagerstown

The WRE is very close to completion. The WRE will meet the requirements of HB1141 with recommended comments added. 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:

- Does the WRE show or refer to the boundaries of relevant areas used for planning, including current sewer and water service areas (MDP Models and Guidelines, pages 27, 33).
- Does the WRE describe the alternative future development options for which nonpoint source and point source loading estimates were performed (MDP M&G 26, page 40)?

Overall Comments:

- The WRE should provide updated information for the following:
 - Sewer service area map (p. 4-2).
 - Wastewater flow data (p. 4-3).
- The following discrepancies should be resolved:
 - Table 4-2 examines build-out sewer demand; however, lines 1 and 2 indicate that the forecast is “through 2028” (p. 4-7).

Water Demand Analysis

Water Demand Analysis Comments:

- **The WRE should include a water service area map.**
- Indicate whether the “Anticipated Permit Increase Request” and “Total Water Demand” in Table 4-6 (p. 4-15) are forecasted through the planning period (2028).
- The City identifies a significant deficit (3.2 MGD) to meet water demand at build-out for the Medium-Range Growth Area (MRGA) (p. 4-17). Given the large water deficits forecasted at build-out, the City should obtain comments from the Maryland Department of Environment to determine if the WRE’s proposed solutions to this deficits are reasonable. **If the solutions are not considered reasonable by MDE, the City should revise its land use designations and/or the Urban Growth Area (UGA) to reduce potential water demand.**

Sewer Demand Analysis/Suitable Receiving Waters

Sewer Demand Analysis Comments:

- Consider the following edits to the sewer service area map (p. 4-2) to add clarity:
 - Add the Consolidated General Services Agreement (GSA) area.
 - Indicate which areas are currently served and which areas are planned for service.
 - Within the UGA, indicate which portion of the “grey” areas are planned for service from the City and which are planned for service from the County, or if either jurisdiction can serve the “grey” areas.
- The City should be commended for using the WRE sewer demand analysis to recognize the need to prioritize service areas within the MRGA and potentially shrink the UGA boundaries if the flow transfer agreement is not extended past 2023 (p. 4-8) and for exploring the potential capacity through nutrient trading among the Funkstown, Conococheague and Hagerstown WWTPs (p. 4-8).
- The WRE provides excellent technological and policy-based recommendations to address the identified sewer capacity constraints in the MRGA and Long-Range Growth Area (LRGA) (pp. 4-12 to 4-13).

Suitable Receiving Waters Comments:

- Add “lbs/yr” to the rows in Table 4-5 (p. 4-11) that refer to TN and TP.
- The pollution forecast should clarify that full implementation of the Maryland Tributary Strategy best management practices (BMPs) are assumed in Table 4-9 (p. 4-22).
- **The WRE should assess the pollution impact of more than one possible land use plan scenario, including the existing land use plan. For example, different land use options or residential densities could be assessed within the current growth areas, or different growth areas could be assessed. The City’s land use plan should be the least impactful with regard to impervious surface and pollution impacts.**
- **The WRE should discuss the suitability of receiving waters. If there is insufficient information to determine suitability (e.g., no nutrient TMDL), the WRE should indicate this.**

Other Water Resource Planning Comments:

Population Projection Comments:

- Water and Sewer demand figures based on 2030 population projections are generally in-line with MDP’s municipal population projections.
- Hagerstown’s 2010 population is 41,429 (MDP’s figure is 42,288)
- Hagerstown’s 2030 population is 55,958 (MDP’s figure is 55,859), an increase of 14,529 people or a 1.6% annual growth rate over the 20-year time period.