

From: [Keith Levchenko](#)
To: [Dixon, Kenneth](#)
Cc: [David Lake](#)
Subject: Council Staff Comments on the Draft Ten Mile Creek Sewer Plan
Date: Friday, December 18, 2015 12:29:47 PM

Ken:

Below are my comments on the Ten Mile Creek Area Sewer Facility Study Working Draft Report.

Thanks,

Keith Levchenko

Senior Legislative Analyst
Montgomery County Council Staff
100 Maryland Avenue, 5th Floor
Rockville, MD 20850
(work) 240-777-7944
(fax) 240-777-7888
keith.levchenko@montgomerycountymd.gov



Please consider the environment before printing this email.

- Remove the word “Draft” in all references to the approved “Ten Mile Creek Area Limited Amendment” (see Section 1.5, 1.51, and 1.52 for example). Since the document was approved by the Council, any reference to “Draft” should be removed.
- The report notes that projected flows are based on assuming no new development on County-owned properties. However, the County could still potentially locate a new fire station on the county-owned property along Route 355. While the Master Plan directs the Executive to search for a new site outside the Ten Mile Creek area (see Master Plan text below), it is possible that a better site may not be found or available, resulting in the current site being used. WSSC should make sure to take this possibility into account in its sewer plans.
- Section 3-1: Add language noting that the Master Plan and the approved Water and Sewer Amendment direct WSSC to minimize environmental impacts. (see actual environmental language below).
- Section 3-1: Add language noting that five initial alternatives were developed by WSSC with the assistance of a consultant. Subsequently, WSSC developed five additional alternatives based on further review and analysis by the Citizens Advisory Committee (CAC) and the Department of Environmental Protection. This point should be made clear to readers, since environmental groups expressed major concerns with the initial alternatives and feel the later alternatives are a big improvement (from an environmental standpoint).
- Section 4.5 should be expanded. WSSC’s “preferred approach” A and B should be

included as alternatives 11 and 12. Although not vetted directly with the CAC, these alternatives share much in common with the other later alternatives. WSSC should include in Section 4.5 or a new section how these two approaches compare to the other alternatives (both similarities and differences).

- DEP should review WSSC's "preferred approach" A and B and provide comments comparing the environmental impacts of A and B with the other alternatives.
- Both of the "preferred approaches" assume a pump station to serve a portion of the Pulte property. A 100% low pressure sewer concept without a pump station is identified as an option. WSSC should clarify why a Pulte pump station is assumed at this time and the low pressure sewer approach is considered an option. If the low pressure sewer approach is determined to be the better approach environmentally (based on further DEP review), then it should be assumed and the pump station approach should be a potential option considered later if information (such as a future subdivision plan) provides a rationale for the need for a pump station.
- The CAC should be discussed somewhere in the report (the formation, membership, dates it met, etc.). I recall that comments received by WSSC from CAC members are to be included in appendices. WSSC should reference these comments (and provide responses where appropriate) in this same section.
- Some discussion how the Historic District is assumed to ultimately be served by sewer via Stage IV development (i.e. Miles Coppola pump station and possibly an interim pump station) should be noted in the report. Montgomery County received assurances from the WSSC General Manager/CEO that WSSC would work with the County to provide the needed pump station infrastructure in a timely manner (potentially in advance of the Mile Coppola development).

Master Plan Language Regarding the New Fire Station

Fire Station

Montgomery County has acquired a vacant, forested property within the Ten Mile Creek Watershed to build a fire station. The site is directly outside the Historic District, between MD 355 and the Miles-Coppola properties. If developed as currently planned and approved, the fire station would result in 37 percent of the property with impervious cover.

Given this property's location at the headwaters of Ten Mile Creek, every effort should be made to explore other possible sites, either outside the Ten Mile Creek Watershed, or on land within the Planning Area that is already developed with impervious surfaces. Leaving the current fire station site undeveloped would not only reduce overall subwatershed imperviousness, but also would provide greater flexibility in the alignment of the planned bypass. While an extensive search for an alternate location should be conducted, if another one is not found, **a fire station at the current location should not be ruled out.**

Consider other locations for a fire station, either outside the Ten Mile Creek Watershed, or on

already developed land within the watershed where building the fire station would result in reducing existing imperviousness. If no other site is found, allow station development on the current site, but redesign the station to reduce imperviousness, to the extent feasible.

Environmental Language

The Ten Mile Creek Limited Master Plan recommends that sewer main alignments and pumping stations be located so as to “minimize, as feasible, disturbance of environmental buffers and forested areas”.

The Water and Sewer Plan amendment resolution notes:

“The County Council expects the Washington Suburban Sanitary Commission’s comprehensive sewer study of the Ten Mile Creek Limited Master Plan Area to review all feasible alternatives for the maximum environmental protection of the area. Sewer infrastructure should avoid Ten Mile Creek, its tributaries, and other water resources unless it is technologically infeasible to do so. Disturbance to all environmentally sensitive areas should be minimized. Only capital projects that satisfy the Master Plan’s recommendation for service and minimize environmental impacts to Ten Mile Creek will be approved by the Council.”