

September 14, 2015

Dear Mr. Dixon, Mr. Lake, and Ms. St. John,

We appreciate the time and effort you spent to prepare the materials for the August CAC meeting. Thank you, too, for sending us the map of Alternative 9.

We found DEP's analysis of environmental impacts thoughtful, enlightening, and persuasive. It provides a good framework for evaluating the alternatives. We agree with DEP that sewer infrastructure should be constructed so as to avoid the buffers and environmentally sensitive features, in particular areas where groundwater source features are clustered and where habitat could be fragmented. Also important will be DEP's recommended geotechnical analysis of soil suitability and surveys to determine the value of habitat features. We endorse DEP's request to remain involved during the concept design phase to review potential environmental impacts.

We were heartened by WSSC's modifications in Alternative 9 in response to DEP's analysis: moving sewer infrastructure away from the buffers on the Egan/Mattlyn property; moving the Miles Coppola East pumping station out of the environmental buffer; and replacing the pumping station and ephemeral stream crossing on the Pulte/King property with pressure sewers outside the buffers. The latter is a wise decision because any sewer pipes buried under an ephemeral stream will be subject to erosion, possible exposure, and cracking. The pumping station also had the potential to spill sewage into one of the creek's more sensitive tributaries.

WSSC modified Alternatives 6 and 7 by realigning the force main downstream of the Miles Coppola North pumping station to avoid a sensitive wetland. We appreciate this modification, but Alternatives 6 and 7 are still unacceptable because of the 9 serious unresolved environmental impacts identified by DEP at this pumping station and upstream of it.

After reviewing the presentation materials in detail, we still have a few questions:

- 1) The plan to align sewers along the future Observation Drive west of Clarksburg Road – found in Alternatives 6, 7, 8, and 9 -- seems unrealistic because when or whether the road will be built and its final alignment are not known. Because this is the Route 355 bypass, a state road, its construction may depend on state funding, which might not be available until long after property owners are ready to build. The road's final alignment may also change in response to reviews during the design phase, including environmental impact analysis. DEP's presentation shows that the projected route of the bypass would have a direct impact on a spring and four ephemeral streams. We ask that WSSC present to the CAC alternatives that can substitute for the bypass alignment if the road is not in design phase or built by the time property owners wish to develop.

- 2) Another question that should be addressed more thoroughly is the "orphaned properties" in both Alternatives 8 and 9. Because one of these properties is adjacent

to an existing development along Dutrow Drive, we wonder whether its sewers can be linked to sewers in the existing development. The property on the other side of Route 355 may be more difficult to sewer unless it, too, can be linked to the sewers along Dutrow Drive. We also should know more about this property's potential for development. The environmental buffers have not yet been mapped for it, but its steeply sloping topography and proximity to surface and groundwater resources suggest that much of it may be within the buffers.

3) DEP identified a sewer main from the Egan/Mattlyn property as having a potential impact where it crosses Ten Mile Creek at Rt. 355. WSSC did not address this impact in its presentation. At the CAC meeting, we expressed our concern that leaks and spills from this sewer main could have a quick and devastating effect downstream because of the steep topography. We asked whether this impact could be eliminated by rerouting the main along Snowden Farm Parkway to existing sewers on Dutrow Drive instead of along Rt. 355. Perhaps the main could be run parallel to existing sewer lines, and a grinder pump/low pressure sewer system be used.

4) We are concerned about the plan to use deep gravity sewers for a length of 1,750 feet (one-third of a mile) along Rt. 355 and Observation Drive. This area is already known to have shallow depth to bedrock. The U.S. Department of Agriculture Soil Survey has mapped the soils along these roads as Linganore-Hyattstown channery silt loams, with depth to hard phyllite (solid bedrock) of 26-51 inches. Blasting would certainly be necessary to install these sewers and could have a serious impact on the geology, surface and groundwater, and existing buildings in the area. We would like to know what alternatives are available to using deep gravity sewers.

5) We are also interested in learning more about potential design requirements to mitigate the effects of corrosive gases on force mains, such as interior coatings, use of PVC or HDPE pipes, and redundant, parallel lines to provide continued service in the event of pipeline failure or leaks. At last spring's open house at the Seneca Wastewater Treatment Plant, the community saw firsthand the grit that comes off concrete sewer pipes as gases cause them to disintegrate. Could these new measures reduce the potential for pipe disintegration, cracking, and leaking and extend the life of the pipes? These mitigations sound like good measures to take to protect Ten Mile Creek.

Thank you as always for the chance to participate in this process. It would be extremely helpful to have answers to these questions as soon as possible so that we can analyze the information before the next CAC meeting.

Respectfully,

Cathy Wiss, CAC member
Anne James, CAC member
Jay Cinque, CAC member