



Maryland DEPARTMENT OF PLANNING

May 5, 2023

Ms. Dinorah Dalmasy, Manager, Integrated Water Planning Program
Maryland Department of the Environment
Water and Science Administration
1800 Washington Boulevard
Baltimore, Maryland 21230

Subject: 2023 Amendment of the Garrett County Water & Sewer Plan 2014

Dear Ms. Dalmasy:

The Maryland Department of Planning (MDP) reviewed the above-referenced and adopted water and sewerage plan amendment pursuant to our mandate to advise the Maryland Department of the Environment (MDE) on local comprehensive plan consistency and other appropriate matters as required by Environment Article Section 9-507 (b)(2). MDP previously reviewed the water and sewer service area map changes included in this amendment during our review of a county amendment the department received on August 10, 2021, and submitted a letter to MDE on October 6, 2021. At that time, the department believed that the map amendments were drafts. However, while reviewing this submission, MDP learned that Garrett County adopted the map amendments during a Board of Garrett County Commissioners (County Commissioners) meeting on April 20, 2021. MDP also notes that the County Commissioners adopted this amendment on March 21, 2023, yet the county did not send a draft version to MDE for review. MDP reminds the county that Environment Article Section 9-506 (a)(1) requires the submission of draft water and sewer plan amendments to the state prior to local adoption. As MDP has already reviewed the map amendments in the October 6, 2021 letter, the comments below relate only to the text amendments in this submission.

Summary of Amendment

The amendment includes the following text updates in the Garrett County Water and Sewerage Master Plan (WSP).

Green and Grantsville Water System

This is a text amendment to incorporate the Green and Grantsville Water System upgrades. The amendment states that the “[t]own is proposing a project to consolidate the Green and Grantsville water systems and treatment plants into a single updated system located at the Green Wastewater Treatment Plant (WWTP) site, conduct a hydraulic study of the two systems and replace aging lines, and install a SCADA system to monitor the tank levels.” The cross-connection of the Green and Grantsville systems stresses the existing infrastructure. In times of drought, water quality issues have surfaced. The text amendment accounts for both systems and for upgrades to ensure water quality and availability for both areas.

Oakland—Trout Run Wastewater Treatment Plant

A text amendment to update the description for the Oakland—Trout Run WWTP upgrade project. The amendment deletes text about an anticipated engineering report and adds text stating that the “County had a study completed in 2016 to develop plant upgrade alternatives that would achieve ENR requirements. The

study recommended alternative for the combined Trout Run/Oakland WWTP ENR [Enhanced Nutrient Removal] Upgrade is to construct an SBR system followed by denitrification filters for the process alternative and conveyance for transferring flow from Trout Run to the combined facility. Although conveyance is not the least expensive option, it provides a social economic benefit of serving the Rosedale and Shaffer Hill Road, west of MD-39, that are experiencing septic system failures.” The added text also describes the specific enhancements of the WWTP project and the associated conveyance system, including three new pump stations, filtering, biological and denitrification removal, and new force main and gravity sewer linear feet.

MD 39/Rosedale Area Sewer Service

This is a text amendment to describe sewer service area changes to the MD 39/Rosedale area, southwest of the Oakland municipal boundary. The amendment states that the “[r]esidents have asked for Town services, and the Town will seek funding to provide service to these areas and to the Shaffer Hill area. Service to portions of this area would require an amendment to the County Comprehensive Plan as the area west of MD 39 is currently designated as a planned growth area.” The area described in the text is included in the April 20, 2021, adopted map amendments which MDP previously reviewed for comprehensive plan consistency in our October 6, 2021 letter to MDE. The text amendment states that serving these areas will require a county comprehensive plan amendment because the “area west of MD 39 is currently designated as a planned growth area”. **MDP believes that this statement is missing the word “not” between “is” and “currently” and recommends that the county fix the error in the WSP.** Map 2.3e of the 2022 Garrett County Comprehensive Plan (Garrett County Comprehensive Plan) designates the area described in the text amendment, west of MD 39, as Rural land use. Page 2-6 of the Garrett County Comprehensive Plan includes a table that indicates the Rural land use category as excluded from the county’s growth area.

Comprehensive Plan Consistency

MDP reviewed the WSP text changes for consistency with the respective county and municipal comprehensive plans.

Green and Grantsville Water System

MDP finds that the text amendment to incorporate the Green and Grantsville Water System upgrades **appears to be consistent** with the Garrett County Comprehensive Plan and the 2009 Grantsville Comprehensive Plan (Grantsville Comprehensive Plan). On page 2-44, the Garrett County Comprehensive Plan states that “serving future demands on the Grantsville system would necessitate an expanded water treatment plant and/or withdrawal permit, or another solution”. The Garrett County Comprehensive Plan also includes a goal to “[w]ork in cooperation with the County’s municipalities to maintain a safe and adequate water supply” (page 2-42).

On page 32, the Grantsville Comprehensive Plan Water Resources Element notes the ageing infrastructure and the need to update existing systems to serve both current and future customers of the town. It also includes a goal to “[e]xpand the town’s infrastructure, ‘Water and Sewer’, to meet the needs of corporate expansion and failing water systems north, south, and east.”

Oakland—Trout Run Wastewater Treatment Plant

MDP finds that the text amendment to update the description for the Oakland—Trout Run WWTP upgrade project **appears to be consistent** with the Garrett County Comprehensive Plan and the 2002 Oakland Comprehensive Plan (Oakland Comprehensive Plan). Page 2-47 of the Garrett County Comprehensive Plan discusses the need for a new combined Trout Run and Oakland WWTP at the site of the existing Oakland WWTP. The text amendment describes WWTP upgrades rather than the construction of a new facility. The decision to change course on WWTP improvements is not described in the text amendment, but it may be the result of the recommendations stemming from the 2016 study. Regardless, the same comprehensive plan page describes the need for WWTP improvements and a new sewer line running from the Trout Run system. Page

2-48 of the Garrett County Comprehensive Plan states that the “Trout Run WWTP will be decommissioned and flow diverted to a new ENR WWTP in the Town of Oakland.”

The Oakland Comprehensive Plan is more than 20 years old and does not include the project described in this text amendment. However, the plan includes language supportive of the WWTP upgrades. Page 4 includes the statement that sewage “[t]reatment capacity is adequate in the system but the Town intends to continue upgrading its sewerage conveyance lines”. While the text amendment project includes more than upgraded sewerage lines, the comprehensive plan recognizes the need for wastewater infrastructure upgrades. In addition, Page 30 in the Community Facilities Element includes a goal that “[r]esidents of Oakland are provided with a variety of community-oriented facilities and services either through Garrett County or Oakland itself. These include: public water and sewer.”

MD 39/Rosedale Area Sewer Service

In the October 6, 2021 review letter, MDP reviewed the sewer service area map changes associated with the MD 39/Rosedale Area text amendments. The department’s consistency findings have not changed since that review.

Priority Funding Area Review

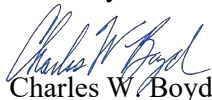
In the October 6, 2021 review letter, MDP listed water and sewer service areas modified in the amendment that were within and outside of Priority Funding Areas (PFAs). MDP encourages Garrett County to consider if the map amendments approved on April 20, 2021 would make any properties eligible for PFA designation, and, if so, to consider designating them as such and submitting a PFA certification to MDP. If any of the projects described in this submission’s text amendments, which were approved on March 21, 2023, are intended to serve areas outside of the PFA, the county may need to designate such areas as PFA and seek MDP’s concurrence prior to securing state funding to support the projects.

Growth Tier Map Review

Planning recommends that the county consider if any areas proposed to be served in the April 20, 2021 approved map amendment may necessitate updates to tier categories 1 or 2 in the 2016 Garrett County Tier Map, which the county incorporated by reference in the 2022 Garrett County Comprehensive Plan.

If you have any questions or concerns regarding these comments, please contact Joe Rogers at joseph.rogers@maryland.gov.

Sincerely,



Charles W. Boyd, AICP
Director, Planning Coordination

cc: Robin Pellicano; Nicholai Francis-Lau; Steve Alfaro; and Hannah C. Benzion, MDE
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