



P.O. Box 142 ★ Sykesville, MD 21784

July 24, 2002

The Honorable Parris N. Glendening,
Governor,
State of Maryland,
State House
Annapolis, MD 21401

RE: Piney Run Water Treatment Plant Construction Permit

Dear Governor Glendening:

We, the Freedom Area Citizens' Council, implore you to compel the Maryland Department of the Environment (MDE) to reject the construction permit application for the proposed water treatment plant (WTP) at Piney Run Lake. Maryland's legacy as a protector of the environment and champion of Smart Growth may indeed be challenged if Carroll County is allowed to continue its pursuit of the WTP.

MDE has not yet received the revised Carroll County Water & Sewer Master Plan that was a condition for consideration of a construction permit for the WTP. According to the terms spelled out in then MDE Director Jane Nishida's letter of July 31, 2001 to the Carroll County Commissioners, the permit application would be rejected on the grounds that it was "inconsistent with Carroll's Water & Sewer Master Plan." In January of this year Carroll County submitted design plans with an application for a construction permit. In addition, the county submitted an application and received approval for construction of a pipeline for the WTP under a disguised description.

It is our position that building a WTP at Piney Run will result in the senseless destruction of a valued wildlife habitat and facilitate growth outside the designated Freedom priority funding area (PFA). The following are readily verifiable facts about the county's plan for the WTP:

- **Carroll County does not know how much water is going over the Piney Run dam every day.**
As such the county has not ascertained whether there is even enough potable water available to sustain its use as a water supply, making the pursuit of a \$16 million capital expenditure fiscally irresponsible. Additionally, the Department of Natural Resources contends that well over twice the 1 mgd minimum represented by the county in their plan for the WTP is needed to sustain Piney Run's downstream wildlife habitats and fisheries.
- **Environmental impact engineering has not been contracted since 1989.**
At the time of the only environmental report in 1989, Greenhorne & O'Mara reported that Piney Run's acreage might be reduced by half during times of drought, which would effectively eliminate recreation at the height of the season and destroy hundreds of acres of submerged aquatic vegetation.
- **Watershed protections do not exist at Piney Run.**
Although listed on EPA's 303(d) polluted bodies of water list for effluent nitrate runoff for several years, Carroll County has made no attempt to purify Piney Run or to put effective safeguards in place to limit its pollution. Rather than protecting Piney Run as a drinking water resource, the county continues to facilitate residential development within close proximity of the lake.

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➤ **South Carroll does not need a \$16 million WTP on Piney Run.**

The possibility of an increased draw from Liberty Reservoir and the addition of over 30% more capacity from wells at Springfield Hospital and Moxley property both exist. These two alternatives represent far less costly and environmentally responsible choices for water in S. Carroll. It is estimated that by bringing the wells on-line the county could add about 1 mgd to the available water supply at a cost of about \$1.6 million. The county proposes funding the \$16 million WTP with a mixture of debt and user fees predicated on increased growth in the area.

➤ **Carroll County consistently ignores Smart Growth initiatives.**

A recent study by the Baltimore Regional Partnership of Carroll County's residential permits concluded that 58% of Carroll's residential development through the year 2020 will occur outside of priority funding areas (PFAs). The county has determined that in order to pay for the Piney Run WTP, several thousand new homes will be required to be added to an already overburdened Freedom area infrastructure. As such, the development of Piney Run as a water resource, will only serve to expand the service area beyond its current confines and facilitate the county's ignorance of Smart Growth initiatives.

In conclusion, it is imperative that the state act promptly to reject the construction permit application, sending a strong message to this and future Boards of Carroll County Commissioners, that protecting the environment and adhering to Smart Growth will continue to be rules that Maryland is governed by.

Sincerely,

Ross A. Dangel
Chairman
Freedom Area Citizens' Council

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