

ST. MARY'S COUNTY GOVERNMENT COMMISSION ON THE ENVIRONMENT

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September 27, 2007

Mr. Saeid Kasraei, Administrator
Water Supply Program, Water Management Administration
Maryland Department of the Environment
Montgomery Park Business Center
1800 Washington Boulevard
Baltimore, MD 21230

Subject: Industrial Groundwater Appropriations

Ref: "Industrial Groundwater Appropriations" letter signed by Steven L. King, Director, St. Mary's County Metropolitan Commission, on July 22, 2007.

Dear Mr. Kasraei:

The Saint Mary's County Commission on the Environment, (COE), a board appointed by the Saint Mary's County Board of County Commissioners, has investigated and discussed the issues contained in the above letter. We fully support the Metropolitan Commission's position on this matter. The COE's rationale for this support is outlined below.

An assessment of recently completed Maryland Geological Survey (MGS) water supply studies conducted by our Water Policy Task Force has clearly revealed that groundwater supplies are "not inexhaustible." The letter referenced above notes that, although a recent Maryland Geological Survey (MGS) study "predicts adequate groundwater resources for residential and commercial purposes in St. Mary's County through 2030, the future of potable water demand projections developed for that analysis did not include significant [additional, large] industrial users." The Morgantown Power Plant in Charles County and the proposed Consolidated Natural Gas Facility in Calvert County are but two examples. The letter also cites two additional, but important, factors: 1) a recently discovered 2002 MGS report on the Magothy & Aquia Aquifers in Anne Arundel County that indicates that the "Management Level" of the Aquia Aquifer has been exceeded in the recharge area of Anne Arundel County, and that, by current guidelines, the Aquia Aquifer has reached its "maximum sustainable yield"; and 2) the most recent projections from the Maryland Department of Planning for population growth in St. Mary's County that exceed baseline figures used in the MGS June 2005 Tri-County study by almost 20 percent. These three issues--lack of consideration of additional, large industrial users in the MGS study, severe stress on the Aquia Aquifer, and population growth approaching the upper limits of the parameters used in the 2005 MGS study--indicate that potable water supplies are likely to be inadequate to meet the needs of our County unless a new water supply is developed or major conservation measures are taken. As you know, conservation measures are easier to implement and usually far less expensive. Controlling potable water usage by large commercial and industrial activities is just such a conservation measure.

It is our position, in principal, that aquifer groundwater supplies should be reserved for potable use. More specifically, they should not be permitted for significant industrial/commercial non-potable uses unless all other reasonable alternatives have been investigated and found infeasible from an engineering standpoint. Possible alternative water sources include in-plant recycled water, stored rainwater off of roofs and parking lots, treated brackish water from the bay, and treated sewage effluent. These sources should be used even when more expensive than drawing from ground water; especially, when one considers the larger expense of developing completely new water supplies for our citizens. Please note that we do not recommend using surficial aquifers, since that supply of water can become restricted during prolonged droughts, and draw down of water during droughts can dry up streams

and non-tidal wetlands.

Policies and legalities surrounding this matter impact all Maryland counties using confined aquifer water. We request that your office sponsor an Maryland Department of the Environment led conference to discuss the issues surrounding use of potable aquifer water by large industrial/commercial activities. This conference should be held soon, so any regulation changes decided on can be in place before another large industrial appropriation request is made. We have shown this letter to our Commissioners and they support such an effort. Please let us know your thoughts on this matter as soon as possible.

Sincerely,

John (Barne) Wheeler
Chairman, St. Mary's County Commission on the Environment