

## **Muddy Branch Alliance Comments Regarding the City of Gaithersburg Environment and Sustainability Master Plan Element.**

November 16, 2014

My name is Paul Hlavinka. I am speaking on behalf of a local watershed group, the Muddy Branch Alliance. We actively reach 702 citizens on our distribution list, who are interested in making a difference in water quality. Our mission is to protect and preserve the vulnerable natural environment that surrounds the Muddy Branch stream and its watershed from Gaithersburg to the Potomac River. We do this by bringing neighbors together to **build awareness, improve the watershed's health, and enhance the community's enjoyment** of its many creeks and streams. We attend public meetings, perform trash pickups, water quality monitoring, address invasive weeds, perform trail work, promote rainscape type projects on public and private properties, mark storm drains, create opportunities for interested citizens to connect with the local stream resources, and provide regular educational meetings on a wide range of topics. We also work with several watershed groups in Seneca Creek to our north and Watts Branch to our south.

Our little stream is highlighted in your proposed Master Plan element. The Muddy Branch is Gaithersburg's largest watershed, and has its headwaters in the City of Gaithersburg. It extends to and discharges into the Potomac 14 miles northwest of DC, and less than 8 miles from where water is taken from the Potomac River and treated by WSSC for our drinking water. Both the Muddy Branch, and Seneca Creek, are designated by the State as "-P", or protected for use as drinking water sources. As our city's biggest watershed, the Muddy Branch also provides our citizens many valuable opportunities for recreation, culture, and enhances our quality of life.

We applaud the hard work of staff in preparing the draft Master Plan Element. We are fortunate to live in an area where the Environment and concepts of Sustainability are considered important elements for serious consideration. We believe that as the City continues to grow, it is important to consider the elements in the plan to ensure that the city is healthy and a great place to live.

Our comments primarily have to do with emphasizing our local water resources and setting goals for the various initiatives suggested in the document. I won't read our entire list of suggestions or clarifications however will provide them in the appendix of our written comments delivered here tonight, that can be considered by the City. I will summarize them now so that you understand our concern from a broader perspective.

- 1) We view the impairments of the Muddy Branch, Seneca Creek and the Potomac, and any potential impacts on our drinking water, as higher priority than the Chesapeake Bay requirements. This isn't to say we suggest you drop mention of the Chesapeake Bay, but that we suggest you emphasize what is important locally first, and then the Chesapeake Bay as a beneficial effect of your actions.
- 2) There are many initiatives mentioned, but no metrics of what is considered a goal for the elements such as community gardens, increased stream buffers, or designated open space. It would be useful to know how many exist today, and then have a measurement for how many areas will be added in the future. What is the minimum expected to ensure the city is sustainable? It is one thing to say, for instance, that community gardens are important. It is another to make sure there are at least one for every square mile. We recommend that the plan include some type of goal or metric.
- 3) What are the City's goals with respect to water quality? We note that currently the designation is 'Fair' on a scale of 'Poor', 'Fair', 'Good' and 'Excellent'. Is the City committed to goals of 'Good', or is the City satisfied with 'Fair'?
- 4) Several of the sections ignore requirements from other sections. For example, for resource conservation, concepts like reducing water usage isn't mentioned. Green roofs are mentioned in one section but ignored in another. Stormwater recommendations are tied to transportation issues in the Water Resources section, but not mentioned in the Transportation section. We provide examples where we feel cross references should be added for clarity.

We look forward to your feedback on the recommendations and in working with the City in the future on issues regarding water quality.

## Appendix – Specific Comments from the Muddy Branch Alliance.

Page 4 mentions only the MS4 phase II permit, and not the industrial stormwater permit later mentioned in the draft.

Page 9 claims that large portions of the city have access to public and/or private open spaces. What is the percentage of open space and how does this compare with other states or cities in the region. Large is a fairly vague term. It would be useful to know where the City stands with regards to Open Space.

Page 10 mentions a concept called a tree save area. Are tree save areas the same as stream buffers? It is our understanding that there really isn't enough land to provide for additional trees. Since forest buffers are a primary way to support water quality, we would like to see that this is mentioned here as well. Add mention of "increasing stream buffer to help restore water quality impairments along our local streams".

Page 12 mentions the social benefits of trees. We know this to be true. Neighborhoods with mature tree coverage and access to adequate safe parks provide so many benefits.

Page 20 Mentions planting diverse species. Why are so many street trees still Bradford pear? Is it possible to identify and use native species?

We suggest adding access via pathways and including education for the community about nature and increased signage relating to trees.

Any thought on harvesting trees in a sustainable way?

Deer management continues to be an area which impacts understory in local stream buffers. Should that be part of the plan?

Glad to see the mention of improved stream corridors. Is there a specific goal? Can that be included? Perhaps a goal to increase stream buffers by 10 feet over the next so many years?

Incorporate the states programs such as back yard buffer into the recommendations.

Page 21

Identify inventory of champion trees.

Allow for planting of WIPs, the smaller trees provided by the State, when groups are interested in doing so, especially when there is a commitment to maintain them.

Add replacement of turf grass with shrubs, community gardens and orchards.

Page 22 The Chesapeake Bay is referenced, but not the Potomac River or our drinking water. Suggest adding that, as this may be more important to local residents. Also stormwater is

referenced as one of several leading causes of impairment of the Chesapeake Bay, but again no mention of our local streams such as the Muddy Branch or Seneca Creek.

Page 23. Again references the Chesapeake Bay TMDL, and only briefly discusses local impairments. Our local stream resources are impaired for chlorides. Clopper Lake for phosphorus. The Potomac, as well as the Muddy Branch has been identified by the State as impaired for Phosphorus. The Potomac has frequent issues with sediments. Seneca has a TMDL for sediments, and the Muddy Branch is impaired for sediments. Again, it is important that these streams end up in the Chesapeake Bay drainage, but more important, these are our local waters and need to be highlighted. Folks in this area care deeply about our drinking water and local water resources. You only need to stand on the banks of the Muddy Branch after a rainstorm to visibly see the impacts of the City of Gaithersburg's urban stormwater runoff. The stream is opaque, it swells quickly, the banks are heavily incised. Just down county from us, Watts Branch also flows into the Potomac. Since that stream discharges closer to WSSC's drinking water input, the impacts of local stream resources are described as a significant problem for the treatment plant. Although the Muddy Branch isn't mentioned (example: [http://www.wsscwater.com/file/Communications/workshop\\_water\\_quality\\_fact\\_sheet.pdf](http://www.wsscwater.com/file/Communications/workshop_water_quality_fact_sheet.pdf)), it and Seneca Creek both are contributors to the sediments that impact the treatment plant.

Page 24. Chlorides from salts applied to roadways are not mentioned. However they are an issue with the Muddy Branch. There are tradeoffs with public safety, so the City needs to play a role in reducing road salts use by exploring use of brines or other options, while paying close attention to public safety.

The impacts of impervious cover are very evident along the Muddy Branch. In lower portions, there are tributaries with low impervious cover that have been recently designated as use III, supporting cold water organisms. Whereas the upper portions of the stream have tributaries that are fair to poor in water quality due to the impacts of high percentage of impervious surfaces.

Page 35. This section mention that Seneca Creek has been delisted as impaired for phosphorus. It should also discuss that the Muddy Branch is impaired for phosphorus, as is the Potomac. It should also mention the presence of substantial algae blooms in public spaces such as the Rio, and although not within the city, lakes like Needwood, which have toxic blooms due to local conditions.

Page 37. Again, this report should mention the Potomac in addition to the Chesapeake Bay.

Page 39. Mention of 270, which bisects the Muddy Branch, should be added.

Page 40. Add bullet about purchasing land or requiring easements to increase stream buffers.

Add a bullet to consider maintenance of the retrofits being implemented.

Add a bullet to address salt runoff, by investigating best management practices for applications to roadways.

Page 42. Add a bullet to discuss illicit discharges, and stormdrain marking and education.

Provide incentives for considering green roof technology as well.

Page 43. Add a bullet to promote retaining some portion of urban Ag to remain pervious land uses in areas such as Belward Farm and the Ag Fair Grounds.

Page 44. Make use of DNR's Streamwader program, and consider how to include both the county and the state in assessments of Gaithersburg on these local water resources.

Consider education on awareness of where our drinking water comes from and how we impact it.

Again, there is mention here of the Chesapeake Bay, but not the Potomac or local impairments.

Add a bullet on community gardening and urban agriculture.

Page 47. Include in the introduction some background on community gardening as a land use as well. Community gardens can help build community in areas where there is high density housing. However it needs to be considered in the planning so that there is land designated for this use (it is mentioned much later on page 70).

Page 51 references reducing traffic on 355, but not the increase of impervious along Seneca Highway where the new bus lanes are being put in across the Muddy Branch and along forested corridor. Perhaps mention here the mitigation for such projects as important.

Page 65. Mentions composting. With the new composting regulations being implemented by the state, should the city consider a small composting operation within the city limits? Highlight the new regulations and how they encourage small scale operations. Perhaps within the fairgrounds if that area is ever redeveloped, or if the city ever has any say in how Belward Farms is redeveloped (fairgrounds are mentioned much later on page 71). The state is encouraging small scale operations, however we are limited in areas where this can even be considered. However, it needs to be considered.

Page 71. The mention of including programmed open spaces is to be applauded. The fairgrounds are an appropriate location. However space is needed close to where people live, so finding additional locations should be considered as well.

Page 73. Consider adding green roof and pervious pavement to the menu of options.

The section on heat island effects mentions housing density as a way to reduce the effect, but that is only effective if there is green space planned for. Density by itself doesn't solve the effect of heat island effect.

Page 74. Consider adding green roof and green streets to this section.

Consider adding the use of cisterns and rain barrels to collect and use rain water vs having to pump water from the Potomac after it is treated with chlorine (all expenses and all require

energy). Treatment of our drinking water takes substantial infrastructure and reducing water usage is another way to save energy costs in a sustainable way.

Page 75. Under resource efficiency, again mention local composting, community gardening and use of cisterns or rain barrels as part of a resource efficiency strategy.

Under "H." consider including land use designations that are specific to community gardening, forest buffer, etc. If the city is able to provide in their plan, land designated for these uses, then the land is protected for the specific use of forest buffer or community garden and not considered for development. That is important for the future of the city.

Page 76. It is great to see the community partnerships that you are suggesting to promote community gardening. Is the city willing to provide space as well? If so, that should be referenced.