



# Maryland

## Department of the Environment

Larry Hogan, Governor  
Boyd K. Rutherford, Lt. Governor

Horacio Tablada, Secretary  
Suzanne E. Dorsey, Deputy Secretary

June 16, 2022

The Honorable Gabe Albornoz  
County Council President  
Montgomery County Council  
Stella Werner Council Office Building  
100 Maryland Avenue  
Rockville, MD 20850

Dear Council President Albornoz:

The Maryland Department of the Environment (MDE) has completed its review of the Administrative Delegation Action **AD 2022-2 (Amendment)** to the 2018-2027 Montgomery County Comprehensive Water Supply and Sewerage Systems Plan. The Amendment was administratively approved on April 18, 2022, by the Director of the Montgomery County Department of Environmental Protection (DEP), under authority granted by the Montgomery County Council. The Amendment includes six (6) service category change requests as set forth below:

### **WSSCR 22-CLO-04A:**

- **Jamie and Cleotilde Aquino** (14405 New Hampshire Avenue, Silver Spring, MD 20904, Parcel P571, Snowdens Mill, Account Number: 00282255, RE-2C Zone, 40,075 square feet). The request is to change the sewer service category from S-5 to S-3.

### **WSSCR 22-TRV-03A:**

- **Michael and Pamela Mason** (12901 Cleveland Drive, Rockville, MD 20850, Lot 15, Block D, Potomac Highlands, Account Number: 00088052, RE-1 Zone, 2.46 acres). The request is to change the sewer service category from S-6 to S-1.

### **WSSCR 22-TRV-07A:**

- **Thomas Gabrielle and Karine Garnier** (9424 Overlea Drive, Rockville, MD 20850, Lot 7, Block E, Potomac Heights, Account Number: 00088360, RE-1 Zone, 1.53 acres). The request is to change the sewer service category from S-6 to S-3.

**WSSCR 22-TRV-08A:**

- **Ronald and Debra Gallant** (13001 Cleveland Drive, Rockville, MD 20850, Lot 16, Block D, Potomac Highlands, Account Number: 00088792, RE-1 Zone, 1.81 acres). The request is to change the sewer service category from S-6 to S-1.

**WSSCR 22-TRV-11A:**

- **Amelia Oelke** (9406 Overlea Drive, Rockville, MD 20850, Lot 4, Block E, Potomac Highlands, Account Number: 00088735, RE-1 Zone, 2.84 acres). The request is to change the sewer service category from S-6 to S-3.

**WSSCR 22-TRV-12A:**

- **Don Titzman** (9400 Overlea Drive, Rockville, MD 20850, Lot 3, Block E, Potomac Highlands, Account Number: 00088028, RE-1 Zone, 2.75 acres). The request is to change the sewer service category from S-6 to S-1.

**Maryland Department of Planning Findings**

Maryland Department of Planning (MDP) has reviewed the amendment and had submitted the following comments to MDE:

- For WSSCR 22-CLO-04A: MDP finds the extension of public sewer service to the property to be consistent with the Cloverly Master Plan.
- For WSSCR 22-TRV-03A, 22-TRV-07A, 22-TRV-08A, 22-TRV-11A, and 22-TRV-12A: All the properties are located within the 2002 Potomac Subregion Master Plan (Master Plan), within the Travilah Planning Area, and within the area identified as the Glen Hills neighborhood. At the time of the writing of the Master Plan, the subject of future sewer extension in Glen Hill was still being examined. MDP finds the category changes to be generally consistent with the Master Plan (see enclosed comments).

**MDE Review and Action**

Wastewater Treatment Plant Capacity: The six (6) properties soon to be connected to public sewer will contribute 1,500 gallons per day (estimated at 250 gallons per equivalent dwelling unit) to the Blue Plains Wastewater Treatment Plant (WWTP). Blue Plains WWTP's current permitted design capacity is 370 million gallons per day (MGD) and the facility's calendar year 2021 average flow was 286.75 MGD, therefore there currently is adequate capacity at the WWTP.

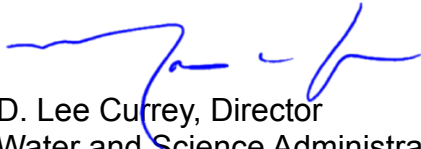
In accordance with §9-507(a) of the Environment Article, Annotated Code of Maryland, the Department hereby **approves the Administrative Delegation Action AD 2022-2**. See the enclosed water and sewer category changes and maps below.

The Honorable Gabe Albornoz

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This completes MDE's review, as required by §9-507 of the Environment Article, Annotated Code of Maryland. If you need further assistance on these matters, please contact Heather Barthel, Deputy Director, at (410) 537-3512, toll-free at (800) 633-6101, or by e-mail at [heather.barthel@maryland.gov](mailto:heather.barthel@maryland.gov).

Sincerely,



D. Lee Currey, Director  
Water and Science Administration

Enclosure

cc: Adriana Hochberg, Acting Director, Montgomery County DEP  
Vicky Wan, Acting Deputy Director, Montgomery County DEP  
Alan Soukup, Senior Planner, Montgomery County DEP  
George Dizelos, Environmental Planner, Montgomery County DEP  
Charles Boyd, Director, Planning Coordination, MDP  
Heather Barthel, Deputy Director, Water and Science Administration, MDE

**Summary of Administration Delegation Action AD 2022-2 to the  
2018-2027 Montgomery County Water Supply and Sewerage Systems Plan  
Amendment**

<b>Case No.</b>	<b>Applicant</b>	<b>Existing Service Area Categories</b>	<b>Service Area Category Request</b>	<b>Administrative Action</b>	<b>MDE Action</b>
WSSCR 22-CLO-04A	Jamie and Cleotilde Aquino (14405 New Hampshire Avenue, Silver Spring, MD 20904, Parcel P571, Snowdens Mill, Account Number: 00282255, RE-2C Zone, 40,075 square feet).	W-1	W-1 (No Change)	<b>Maintain W-1 (No Change)</b>	<b>Maintain W-1 (No Change)</b>
		S-5	S-3	<b>Approve S-3</b>	<b>Approve S-3</b>
WSSCR 22-TRV-03A	Michael and Pamela Mason (12901 Cleveland Drive, Rockville, MD 20850, Lot 15, Block D, Potomac Highlands, Account Number: 00088052, RE-1 Zone, 2.46 acres).	W-3	W-3 (No Change)	<b>Maintain W-3 (No change)</b>	<b>Maintain W-3 (No change)</b>
		S-6	S-1	<b>Approve S-1, for one sewer connection only</b>	<b>Approve S-1, for one sewer connection only</b>
WSSCR 22-TRV-07A	Thomas Gabrielle and Karine Garnier (9424 Overlea Drive, Rockville, MD 20850, Lot 7, Block E, Potomac Heights, Account Number: 00088360, RE-1 Zone, 1.53 acres).	W-3	W-3 (No change)	<b>Maintain W-3 (No change)</b>	<b>Maintain W-3 (No change)</b>
		S-6	S-3	<b>Approve S-3</b>	<b>Approve S-3</b>

<b>Case No.</b>	<b>Applicant</b>	<b>Existing Service Area Categories</b>	<b>Service Area Category Request</b>	<b>Administrative Action</b>	<b>MDE Action</b>
WSCCR 22-TRV-08A	Ronald and Debra Gallant (13001 Cleveland Drive, Rockville, MD 20850, Lot 16, Block D, Potomac Highlands, Account Number: 00088792, RE-1 Zone, 1.81 acres).	W-3	W-3 (No change)	<b>Maintain W-3 (No change)</b>	<b>Maintain W-3 (No change)</b>
		S-6	S-1	<b>Approve S-1, for one sewer connection only</b>	<b>Approve S-1, for one sewer connection only</b>
WSCCR 22-TRV-11A	Amelia Oelke (9406 Overlea Drive, Rockville, MD 20850, Lot 4, Block E, Potomac Highlands, Account Number: 00088735, RE-1 Zone, 2.84 acres).	W-3	W-3 (No change)	<b>Maintain W-3 (No change)</b>	<b>Maintain W-3 (No change)</b>
		S-6	S-3	<b>Approve S-3</b>	<b>Approve S-3</b>
WSCCR 22-TRV-12A	Don Titzman (9400 Overlea Drive, Rockville, MD 20850, Lot 3, Block E, Potomac Highlands, Account Number: 00088028, RE-1 Zone, 2.75 acres).	W-3	W-3 (No change)	<b>Maintain W-3 (No change)</b>	<b>Maintain W-3 (No change)</b>
		S-6	S-1	<b>Approve S-1, for one sewer connection only</b>	<b>Approve S-1, for one sewer connection only</b>



MONTGOMERY COUNTY DEPARTMENT OF ENVIRONMENTAL PROTECTION

Comprehensive Water Supply and Sewerage Systems Plan Amendments
Administrative Delegation [Action] (AD) 2022-2 – Statement of Action
Water/Sewer Service Area Category Change Requests

CHRONOLOGY

Table with 2 columns: Event and Date. Rows include Interagency Notices of Public Hearing (Feb 18, 2022), Published Notice of Public Hearing (Mar 9, 2022), Public Hearing (Mar 23, 2022), Public Hearing Record Closed (Mar 30, 2022), and DEP Administrative Approval Action (April 18, 2022).

BACKGROUND

Authority: Under the Annotated Code of Maryland, Section 9-501, et seq., the Maryland Department of the Environment (MDE) has charged the Montgomery County Council, as the governing body for Montgomery County, with adopting and amending a comprehensive plan for the provision of adequate water supply and sewerage systems within the county.

In the adopted CWSP, the County Council has delegated to the Director of the Department of Environmental Protection (DEP), through an administrative process, the authority to approve certain amendments to the Plan, including water and sewer category changes.

Proposed Plan Amendments: DEP staff considered six proposed amendments for approval by the administrative delegation process. All six amendments were for service area category changes. The proposed amendments reviewed by the following agencies, as appropriate: the Washington Suburban Sanitary Commission (WSSC), the Maryland - National Park and Planning Commission (M-NCPPC), and the Montgomery County Department of Permitting Services (DPS) - Well and Septic Section.

PUBLIC HEARING PROCESS

Public Hearing Notification: In accordance with State regulations, on February 18, 2022, DEP notified the appropriate County and State agencies of an administrative public hearing, scheduled for March 23, 2022, and provided the staff recommendations for the proposed amendments.

Public Hearing Testimony and Interagency Recommendations: DEP staff scheduled a remote public hearing for the date and time included in the hearing notices. The hearing notices specified that anyone wanting to provide testimony needed to contact DEP staff to receive information on how to do so.

On April 14, 2022, Keith Levchenko, senior legislative analyst on the Council's staff notified DEP that the Councilmembers concurred with the approval recommended for this administrative action.

On March 17, 2022, the Planning Board met to consider M-NCPPC staff recommendations for the amendment included in the AD 2022-2 administrative delegation packet. The Board concurred with the M-NCPPC staff recommendations for the included amendments, which agreed with DEP's staff recommendation.

**DEP ADMINISTRATIVE ACTION**

The 2018-2027 water/sewer category map update of the *Montgomery County Comprehensive Water Supply and Sewerage Systems Plan* is hereby amended as follows:

**Cloverly Planning Area**

**WSSCR 22-CLO-04A: Jamie and Cleotilde Aquino**

Property Information and Location Property Development	Applicant's Request: Administrative Action and Policy Justification
<ul style="list-style-type: none"> <li>14405 New Hampshire Ave., Silver Spring</li> <li>Parcel P571, Snowdens Mill (acct. no. 00282255)</li> <li>Map tile: WSSC – 219NE01; MD –JR53</li> <li>East side of New Hampshire Ave., 650 feet North of Old Bonifant Rd.</li> <li>RE-2C Zone; 40,075 sq.ft.</li> <li>Cloverly Planning Area Cloverly Master Plan (1997)</li> <li>Paint Branch Watershed (MDE Use III)</li> <li><u>Existing use</u>: Single-Family Home (built 1951)</li> <li><u>Proposed use</u>: Sewer service for the Existing Single-Family Home</li> </ul>	Service Area Categories: <u>Existing</u> <b>Requested</b> W-1            W-1 (no change) S-5 <b>S-3</b>  Administrative Action <b>Approve S-3</b> , Administrative policy V.D.2.a.: Consistent with Existing Plans. (Mapping on pgs.7)

**Travilah Planning Area**

**WSSCR 22-TRV-03A: Michael and Pamela Mason**

Property Information and Location Property Development	Applicant's Request: Administrative Action and Policy Justification
<ul style="list-style-type: none"> <li>12901 Cleveland Dr., Rockville</li> <li>Lot 15, Block D, Potomac Highlands (acct. no. 00088052)</li> <li>Map tile: WSSC – 217NW09; MD –FR51</li> <li>East side of Cleveland Dr., At the intersection with Overlea Dr.</li> <li>RE-1 Zone; 2.46 ac.</li> <li>Travilah Planning Area Potomac Subregion Master Plan (2002)</li> <li>Watts Branch Watershed (MDE Use I)</li> <li><u>Existing use</u>: Single-Family Home (built 1977)</li> <li><u>Proposed use</u>: Sewer service for the Existing Single-Family Home</li> </ul>	Service Area Categories: <u>Existing</u> <b>Requested</b> W-3            W-3 (no change) S-6 <b>S-1</b>  Administrative Action <b>Approve S-1, for one sewer connection only.</b> Administrative policy V.D.2.a: community service for properties abutting mains. (Mapping on pg.8)

**WSSCR 22-TRV-07A: Thomas Gabrielle and Karine Garnier**

Property Information and Location Property Development	Applicant's Request: Administrative Action and Policy Justification						
<ul style="list-style-type: none"> <li>• 9424 Overlea Dr., Rockville</li> <li>• Lot 7, Block E, Potomac Highlands (acct. no. 00088360)</li> <li>• Map tile: WSSC – 216NW09; MD –FQ53</li> <li>• West side of Overlea Dr., at the intersection with Watts Branch Dr.</li> <li>• RE-1 Zone; 1.53 ac.</li> <li>• Travilah Planning Area Potomac Subregion Master Plan (2002)</li> <li>• Watts Branch Watershed (MDE Use I)</li> <li>• <u>Existing use</u>: Single-Family Home (built 1956)</li> <li>• <u>Proposed use</u>: Sewer service for the Existing Single-Family Home</li> </ul>	Service Area Categories: <table border="0"> <tr> <td><u>Existing</u></td> <td><b>Requested</b></td> </tr> <tr> <td>W-3</td> <td>W-3 (no change)</td> </tr> <tr> <td>S-6</td> <td><b>S-3</b></td> </tr> </table> Administrative Action <b>Approve S-3</b> (Potomac peripheral sewer service policy), Administrative policy V.D.2.a.: Consistent with Existing Plans. (Mapping on pg.9)	<u>Existing</u>	<b>Requested</b>	W-3	W-3 (no change)	S-6	<b>S-3</b>
<u>Existing</u>	<b>Requested</b>						
W-3	W-3 (no change)						
S-6	<b>S-3</b>						

**WSSCR 22-TRV-08A: Ronald and Debra Gallant**

Property Information and Location Property Development	Applicant's Request: Administrative Action and Policy Justification						
<ul style="list-style-type: none"> <li>• 13001 Cleveland Dr., Rockville</li> <li>• Lot 16, Block D, Potomac Highlands (acct. no. 00088792)</li> <li>• Map tile: WSSC – 217NW09; MD –FR51</li> <li>• East side of Cleveland Dr., 700 ft north of the intersection with Overlea Dr.</li> <li>• RE-1 Zone; 1.81 ac.</li> <li>• Travilah Planning Area Potomac Subregion Master Plan (2002)</li> <li>• Watts Branch Watershed (MDE Use I)</li> <li>• <u>Existing use</u>: Single-Family Home (built 1960)</li> <li>• <u>Proposed use</u>: Sewer service for the Existing Single-Family Home</li> </ul>	Service Area Categories: <table border="0"> <tr> <td><u>Existing</u></td> <td><b>Requested</b></td> </tr> <tr> <td>W-3</td> <td>W-3 (no change)</td> </tr> <tr> <td>S-6</td> <td><b>S-1</b></td> </tr> </table> Administrative Action <b>Approve S-1, for one sewer connection only.</b> Administrative policy V.D.2.a: community service for properties abutting mains. (Mapping on pg.10)	<u>Existing</u>	<b>Requested</b>	W-3	W-3 (no change)	S-6	<b>S-1</b>
<u>Existing</u>	<b>Requested</b>						
W-3	W-3 (no change)						
S-6	<b>S-1</b>						



**WSSCR 22-TRV-11A: Amelia Oelke**

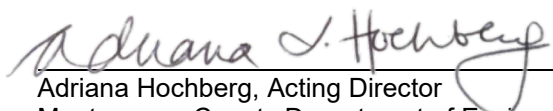
Property Information and Location Property Development	Applicant's Request: Administrative Action and Policy Justification
<ul style="list-style-type: none"> <li>9406 Overlea Dr., Rockville</li> <li>Lot 4, Block E, Potomac Highlands (acct. no. 00088735)</li> <li>Map tile: WSSC – 217NW09; MD –FR51</li> <li>West side of Overlea Dr., 250 ft south of the intersection with Cleveland Dr.</li> <li>RE-1 Zone; 2.84 ac.</li> <li>Travilah Planning Area Potomac Subregion Master Plan (2002)</li> <li>Watts Branch Watershed (MDE Use I)</li> <li><u>Existing use</u>: Single-Family Home (built 1972)</li> <li><u>Proposed use</u>: Sewer service for the Existing Single-Family Home</li> </ul>	Service Area Categories: <u>Existing</u> <b>Requested</b> W-3            W-3 (no change) S-6 <b>S-3</b>  Administrative Action <b>Approve S-3</b> (Potomac peripheral sewer service policy), Administrative policy V.D.2.a.: Consistent with Existing Plans. (Mapping on pg.11)

**WSSCR 22-TRV-12A: Don Titzman**

Property Information and Location Property Development	Applicant's Request: Administrative Action and Policy Justification
<ul style="list-style-type: none"> <li>9400 Overlea Dr., Rockville</li> <li>Lot 3, Block E, Potomac Highlands (acct. no. 00088028)</li> <li>Map tile: WSSC – 217NW09; MD –FR51</li> <li>Northwest side of Overlea Dr., at the intersection with Cleveland Dr.</li> <li>RE-1 Zone; 2.75 ac.</li> <li>Travilah Planning Area Potomac Subregion Master Plan (2002)</li> <li>Watts Branch Watershed (MDE Use I)</li> <li><u>Existing use</u>: Single-Family Home (built 1958)</li> <li><u>Proposed use</u>: Sewer service for the Existing Single-Family Home</li> </ul>	Service Area Categories: <u>Existing</u> <b>Requested</b> W-3            W-3 (no change) S-6 <b>S-1</b>  Administrative Action <b>Approve S-1, for one sewer connection only.</b> Administrative policy V.D.2.a: community service for properties abutting mains. (Mapping on pg.12)

Now therefore be it resolved by the Director of the Montgomery County Department of Environmental Protection that the amendments described above for inclusion in the County's *Comprehensive Water Supply and Sewerage Systems Plan* are approved. DEP will revise the water and sewer category maps in the County's geographic information system (GIS) database to include these amendments, and they will be shown as part of the next interim or triennial service area map update.

Approved

 4/18/2022  
 Adriana Hochberg, Acting Director      Date  
 Montgomery County Department of Environmental Protection

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**NOTIFICATION OF DEP ACTION**

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DEP will submit notification of the Director's action to MDE for that agency's review. MDE has 60 days to either comment on the administrative approvals granted or invoke up to two 45-day review extensions. DEP will also notify each applicant, appropriate county government agencies, and other interested parties of the Director's action. A list of agencies that will receive a copy of this summary of action follows:

Distribution: Interagency

D. Lee Currey, Director, Water and Science Admin., MDE  
Gabe Albornoz, President, Montgomery County Council  
Keith Levchenko, Montgomery County Council  
Mitra Pedoeem, Director, DPS  
Heidi Benham, Well & Septic Section, DPS  
Casey Anderson, Chairman, Planning Board  
Patrick Butler, Donnell Zeigler and Katherine Nelson, Upper County Planning Team, M-NCPPC  
Jason Satori, Functional Planning Division, M-NCPPC  
Christina Sorrento, Intake and Regulatory Coord. Division, M-NCPPC  
Geoffrey Mason, Parks Planning Division., M-NCPPC  
Carla Reid, General Manager, WSSC  
Ray Chicca, Tom Gingrich, & Fred Mejias, Development Services Division, WSSC  
Luis Tapia, Permit Services Section, WSSC  
Eintou Karima, Assessments Group, WSSC

Distribution: Property Owners /Other Interested Parties/Public Interest Groups

22-CLO-04A... Jamie and Cleotilde Aquino  
22-TRV-03A... Michael and Pamela Mason  
22-TRV-07A... Thomas Gabrielle and Karine Garnier  
22-TRV-08A... Ronald and Debra Gallant  
22-TRV-11A... Amelia Oelke  
22-TRV-12A... Don Titzman

Audubon Naturalist Society  
Cloverly Civic Assoc.  
Cloverly-Fairland-White Oak CAC  
East County Citizens Advisory Board  
Greater Glen Mill Community Association  
Greater Glen Hills Coalition LLC  
Glen Hills Civic Association  
Glen Hills Community Coalition  
Glen Preservation Foundation  
Northern Montgomery County Alliance  
Montgomery County Civic Federation  
Montgomery Coalition to Stop Sewer Sprawl  
Patuxent Watershed Protective Association  
Potomac Highlands Citizens Association  
Spencerville Civic Association  
West Montgomery County Citizens Association

Attachments

Service Area Category Designations (see page 6)  
Amendment Service Area Category Mapping (see pages 7-12)

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**WATER/SEWER SERVICE AREA CATEGORIES INFORMATION**

The Montgomery County Ten-Year Comprehensive Water Supply and Sewerage Systems Plan designates water and sewer service area categories for each property within the County. These service area categories determine a property’s eligibility to receive public water and/or sewer service and indicate when the County and the sanitary utility (usually the Washington Suburban Sanitary Commission (WSSC)) should program water and sewerage facilities to serve those properties. (Although the actual provision of public service is often dependent on an applicant’s own development schedule.) The Water and Sewer Plan is adopted and amended by the County Council; it is administered by the County Executive through the Department of Environmental Protection (DEP).

**Water and Sewer Service Area Categories Table**

Service Area Categories	Category Definition and General Description	Service Comments
W-1 and S-1	Areas served by community (public) systems which are either existing or under construction. <ul style="list-style-type: none"> <li>This may include properties or areas for which community system mains are not immediately available or which have not yet connected to existing community service.</li> </ul>	Properties designated as categories 1 and 3 are eligible for to receive public water and/or sewer service. New development and properties needing the replacement of existing wells or septic systems are generally required to use public service. Properties with wells or septic systems on interim permits are required to connect to public service within one year of its availability.
W-2 and S-2	<p><b>Categories W-2 and S-2 are not used in the Montgomery County Water and Sewer Plan.</b>                      (State’s definition: Areas served by extensions of existing community and multi-use systems which are in the final planning stages.)</p>	Where water and/or sewer mains are financed under the front foot benefit system, WSSC will assess front foot benefit charges for mains abutting these properties unless the property has a functioning well and/or septic system. WSSC provides public water and sewer service throughout the county, except where service is provided by systems owned by the City of Rockville or the Town of Poolesville.
W-3 and S-3	Areas where improvements to or construction of new community systems will be given immediate priority and service will generally be provided within two years or as development and requests for community service are planned and scheduled.	WSSC will not serve properties designated as categories 4 or 5, but will work to program water and/or sewer projects needed to serve these areas. Permits for new wells and/or septic systems for category 4 properties will be interim permits. (See above for further information.) MCDEP may require that development proceeding on interim wells and septic systems in category 4 areas also provide dry water and sewer mains and connections.
W-4 and S-4	Areas where improvements to or construction of new community systems will be programmed for the three- through six-year period. <ul style="list-style-type: none"> <li>This includes areas generally requiring the approval of CIP projects before service can be provided.</li> </ul>	Where water and/or sewer mains are financed under the front foot benefit system, WSSC will assess front foot benefit charges for abutting properties designated as category 4 unless the property has a functioning well and/or septic system. WSSC will not assess front foot charges for properties designated as category 5.
W-5 and S-5	Areas where improvements to or construction of new community systems are planned for the seven- through ten-year period. <ul style="list-style-type: none"> <li>This category is frequently used to identify areas where land use plans recommend future service staged beyond the scope of the six-year CIP planning period.</li> </ul>	WSSC will neither provide service to nor assess front foot benefit charges for properties designated as category 6. Development in category 6 areas is expected to use private, on-site systems, such as wells and septic systems.
W-6 and S-6	Areas where there is no planned community service either within the ten-year scope of this plan or beyond that time period. This includes all areas not designated as categories 1 through 5. <ul style="list-style-type: none"> <li>Category 6 includes areas that are planned or staged for community service beyond the scope of the plan’s ten-year planning period, and areas that are not ever expected for community service on the basis of adopted plans.</li> </ul>	

Please note that the County does not necessarily assign water and sewer categories in tandem (i.e. W-3 and S-3, or W-5 and S-5), due to differences in water and sewer service policies or to actual water or sewer service availability. Therefore, it is important to know *both* the water *and* sewer service area categories for a property.

