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2662 Riva Road
Annapolis, MD 21401

Christopher J. Phipps, P.E.
Director

2/10/2020

Mr. Stewart Comstock
Program Review Division Chief
Sediment, Stormwater & Dam Safety Program
Water and Science Administration
Maryland Dept. of the Environment
1800 Washington Blvd.
Baltimore, MD 21230

Subject: Anne Arundel County NPDES MS4 Permit # MD0068306 (11-DP-3316)
Fiscal Year 2019 (FY19) Annual Report
FY2019 WPRP Annual Report

Dear Mr. Comstock:

With this correspondence we are submitting Anne Arundel County's Fiscal Year 2019 NPDES MS4 Annual Report (Report). This report provides compliance information pertinent to the subject NPDES MS4 Permit (Permit), as modified on December 7, 2018, and covers the time period of July 1, 2018 through June 30, 2019. During this reporting year, the County's NPDES MS4 Permit expired (February 11, 2019) and was administratively extended until a new NPDES MS4 Permit is issued.

In addition to the enclosed narrative report, data and supporting information is submitted in the required MS4 Geodatabase format (Appendix A to the Report) on the enclosed DVD. Please also refer to the ReadMe document included in that appendix. Specific compliance reports and supporting data (e.g., Illicit Discharge Detection and Elimination – 2019 Annual Report) are similarly provided in electronic format in the appendices folders on the enclosed DVD.

With this Report, the County is concurrently submitting the FY2019 WPRP Annual Report. This Excel Workbook is submitted in electronic format only, is included in the *NarrativeFiles* table of the Geodatabase, and found in the Appendix K folder on the enclosed DVD.

The County continues to maintain legal authority to comply with the Permit terms. Additionally and following the State of Maryland's adoption of Water Quality Trading Regulations in July 2018, the County requested a permit modification to allow nutrient trading as a means to achieve compliance with the restoration requirements of the Permit. Following public notice and public hearings, Maryland Department of the Environment (MDE) issued a final determination and the modified Permit became effective December 7, 2018. County compliance with the nutrient trading component of the modified Permit is documented in Part IV.E.3 of the Report.

With the FY18 MS4 Annual Report submittal (Feb. 11, 2019), the County provided an updated impervious area assessment and restoration baseline, identifying the Permit-required 20% impervious surface restoration (20% ISR) metric as 4,996 acres. At the end of the permit term (Feb. 11, 2019), the County had documented achievement of this 20% ISR metric through implementation of restoration project and alternative BMP practices (2,389 equivalent impervious acres), as well as acquisition of nutrient credits generated by the County's WRFs (equivalent to 2,607 impervious acres). Attainment of this 20% ISR metric was also documented a March 29, 2019 submittal to MDE, in response to MDEs March 13, 2019 data request for a final impervious acre restoration analysis. MDE indicated acceptance of the updated impervious area assessment, the 20% ISR goal acreage, and the County's achievement of this metric in their FY18 MS4 Annual Report review comments.

During FY19, the County maintained compliance with the 20% ISR metric. Part IV.E.2.a of the FY19 Report summarizes the County's continued progress relative to this metric while Part IV.C.6 describes the inventory of restoration projects that support these, and future, ISR achievements. More importantly, restoration projects completed in FY19 restored or managed 1,579.3 equivalent impervious acres and contributed to a cumulative total of 3,169.7 impervious acres restored from FY14 through FY19. For the FY19 reporting year, and to document continued compliance with this metric, the County is claiming 1,827 equivalent impervious restoration credits via nutrient trading; this is 780 fewer credits than were claimed at the end of the permit term (Feb 11, 2019). The County continues efforts to replace these credits via implementation of restoration projects and feels confident that the restoration projects currently in design or under construction will provide the necessary additional impervious surface management.

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We thank you for your consideration of this FY2019 NPDES MS4 Annual Report. Should you have any questions regarding the submittal content, or require an additional copy, please contact Janis Markusic at 410.222.0551 or via email at pwmark02@aacounty.org.

Sincerely,



Erik Michelsen, Administrator
Watershed Protection and Restoration Program

JM
Enclosure

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