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Christopher J. Phipps, P.E.
Director

February 8, 2021

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 2020 (FY20) Annual Report

Dear Mr. Comstock:

With this correspondence we are submitting Anne Arundel County's Fiscal Year 2020 NPDES MS4 Annual Report (Report). This report provides compliance information pertinent to the subject NPDES MS4 Permit (Permit) and covers the time period of July 1, 2019 through June 30, 2020. The County continues to maintain legal authority for compliance with the Permit terms. The County's Department of Public Works, Bureau of Watershed Protection and Restoration continues to coordinate Permit administration in collaboration with sister County agencies.

Pursuant to your Department's request, all compliance report information and data are provided as an electronic submission; no hard copy documents are provided. In addition to the narrative Report, data and supporting information are submitted in the required MS4 Geodatabase format (Appendix A to the Report). We call your attention to the ReadMe document included in this submittal for additional interpretation and explanation relative to completion of the MS4 Geodatabase fields. Specific compliance narrative reports and supporting data (e.g., Illicit Discharge Detection and Elimination – 2020 Annual Report) are similarly provided in electronic format as Report appendices.

Included with this Report submittal is the County's Financial Assurance Plan (FAP) with Executive Summary. Anne Arundel County Council approved the FAP via Resolution 4-21 on February 1, 2021. Also included is the required FY20 WPRP Annual Report, an additional financial reckoning document. The FAP and Resolution 4-21, as well as the required FY20

WPRP Annual Report, are included in the *NarrativeFiles* table of the Geodatabase and in Appendices J and K of the Report. These financial reporting documents verify that the County has adequate funding to comply with permit conditions.

As of June 2020, we achieved the administratively-continued NPDES MS4 Permit's 20% equivalent impervious acre (EIA) restoration goal (4,996 acres). This was accomplished through implementation of restoration projects and alternative BMPs to achieve a cumulative 4,473.4 EIA credits, allowing all credits previously acquired through nutrient trading with the County's WRFs to be replaced. The remainder of the 20% EIA restoration goal was met through a suite of annual practices (525.7 EIA credits) that will be continued at the current level of effort into the new permit term. The Report (Part IV.E.2.a and E.3) and accompanying MS4 Geodatabase provide documentation of restoration efforts during the FY20 reporting period (1,595.2 EIA credits) as well as the cumulative impervious area restoration from FY14 through FY20 (4,999.1 EIA credits). In summary, the 20% EIA restoration goal is achieved and all nutrient trading credits are replaced with actual restoration project EIA credits.

We continue to collect BMP data from newly completed grading permits, entering the data from as-built plans into a database structure and geospatial framework that is designed to manage the County's inventory. These data are reviewed in context with restoration BMPs to ensure any required adjustments to drainage areas and BMP POIs are addressed when more than one BMP provides stormwater management for a given area. The County continues to grapple with the challenge of data formatting for loading into the MS4 Geodatabase framework. For older BMPs, the mandatory data fields may never be populated because either the data are missing from the plan drawings or the BMP design pre-dated the type of information now required. We understand that certain mandatory data are necessary for crediting purposes. Moreover, we are required to account for all Urban BMPs and perform triennial inspections regardless of their contribution to TMDL Stormwater Wasteload Allocation (SW-WLA) achievement or managed EIA crediting. To account for any geodatabase data formatting issues, we continue our practice of incorporating error codes into the MS4 Geodatabase and, again, refer you to the ReadMe document for explanations of null and/or blank values as well as error codes. Representative examples include the "99999" error code that represents a missing descriptive value, while dates coded as "1/1/1899" are used for missing or inapplicable values (e.g., the mandatory built date field for projects that are proposed or under construction).

Stormwater management construction inspection and preventative maintenance inspections continued in FY20 with staff successfully completing field inspections during the COVID-19 social distancing restrictions. We are pleased to report that 6,394 triennial maintenance inspections were conducted and are included in the *BMPInspections* table of the MS4 Geodatabase. These are in addition to the reported inspections for alternative BMPs and restoration BMPs.

During the reporting period, the County's IDDE program successfully inspected 155 storm drain outfalls and visually screened over 370 industrial and commercial sites for the potential to discharge pollutants during storm events. Complete documentation of the IDDE activities and follow-up enforcement actions are found in Appendix E of the Report and in the *IDDE* table of the MS4 Geodatabase.

Information on the application of de-icing materials in FY20, and on our Salt Management Plan, are found in Part IV.D.5.b of the Report and in the *ChemicalApplication* table of the MS4 Geodatabase. Due to below normal snowfall conditions during the reporting period, combined with the County's Sensible Salting Practices, considerably less de-icing material (road salt, liquid salt brine, liquid CaCl) was applied to County road surfaces than in the five prior reporting periods.

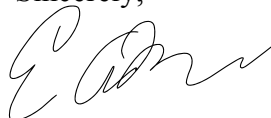
Although in-person gatherings were cancelled in the latter half of the reporting period, we continued to maintain a robust and comprehensive public education and outreach program through online and social media platforms. The County public education programs focus on multiple aspects of stormwater pollution reduction and prevention. Public education accomplishments are found in Part IV.D.6 of the Report.

We also continue work toward achieving the SW-WLA associated with both the Chesapeake Bay TMDL and the individual TMDLs applicable to County lands and waterways. In addition to documentation of restoration project effect on SW-WLA achievement, the County initiated monitoring programs related to both Bacteria and PCB TMDLs. Our annual TMDL implementation progress is summarized in the Report (Part IV.E.2.b and E.5), and documented in the *CountywideStormwaterWatershedAssessment* and *LocalStormwaterWatershedAssessment* tables of the MS4 Geodatabase. Detailed individual TMDL annual implementation progress reports are found in Appendix I of the Report.

During the reporting period, we also continued the required Assessment of Controls monitoring program. A summary of the monitoring activities and results is included in the Report (Part IV.F). Monitoring results are found in the MS4 Geodatabase as are the monitoring site locations and drainage area data. The full annual monitoring reports for both the Church Creek/Parole Plaza Watershed Restoration Assessment and the Picture Spring Branch Stormwater Management Assessment are found in Appendices C and D, respectively, of the Report.

We thank you for your consideration of this FY2020 NPDES MS4 Annual Report. Should you have any questions regarding the submittal content please contact Janis Markusic at 410.222.0551 or via email at pwmark02@aacounty.org.

Sincerely,



Erik Michelsen,
Deputy Director
Bureau of Watershed Protection and Restoration

EM:JM

Mr. Stewart Comstock
February 8, 2021
Page 4

cc: Christopher J. Phipps, Director, DPW
Ginger Ellis, Planning Administrator, BWPR
Brenda Morgan, Engineer Administrator, BWPR
Janis Markusic, Program Manager, BWPR
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