

Countywide TMDL Stormwater Implementation Plan – FY25

Appendix G

*MDE Watershed Protection, Restoration, and Planning Program (WPRPP) Memorandum:
Anne Arundel County Countywide Stormwater Total Maximum Daily Load Implementation Plan
(March 31, 2025)*

1. *Anne Arundel County demonstrated progress toward meeting nutrient and sediment TMDL SW-WLAs through documentation of ongoing BMP implementation and annual reductions achieved.*

Response: No response required.

2. *MDE commends the County's modeled achievement of the TMDL reduction target for the South River TSS TMDL in FY24. MDE is currently in the process of developing guidance for jurisdictions who have demonstrated achievement of WLAs via implemented practices and modeling exercises. MDE encourages the County to reach out if they wish to provide feedback or additional insight during the guidance development process.*

Response: No response required.

3. *Table 15: TMDL summary for Other West Chesapeake Bay TSS is not consistent with the values presented in Table 7: Local TSS and nutrient TMDL progress. MDE believes Table 7 requires a correction.*

Response: The rows in Table 7 were out of order (specifically, the values and labels for Upper Patuxent and West Chesapeake Bay were reversed). This has been corrected.

4. *Anne Arundel County demonstrated its progress toward meeting bacteria TMDL SW- WLA in the form of watershed-specific upland BMP implementation and retrofits, septic connections, as well as programmatic initiatives that apply to all bacteria TMDL watersheds. The County has opted into Chesapeake Bay Trust's Pooled Monitoring Program in lieu of conducting bacteria trend monitoring, looking to fund innovative monitoring methods that can aid in their future efforts. Additionally, the County summarized their implementation progress updates in a table in Appendix F.*

Response: No response required.

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5. *On page 48, under the Tier A Monitoring section (IV.A.1.d), the County states: "Moving forward, the County intends to focus future bacteria reduction efforts in TMDL watersheds where SW-WLAs have not yet been met, to the greatest extent possible." WPRPP suggests pairing the County-collected data under the existing bacteria monitoring programs with the spatial analysis recommended in MDE's Guidance for Developing Bacteria TMDL SW-WLA. Overlaying land use and potential fecal bacteria pollution sources with existing data could help direct the County's implementation efforts.*

Response: The County thanks MDE for this suggestion to investigate potential fecal bacteria pollution sources using spatial data.

6. *The status of SSOs for FY2024 in Appendix F shows an increase in both number (67%) and volume of overflows (176%) compared to the previous year. Has the County investigated the increase and any corrective measures been taken? Did the overflows occur in areas where sanitary sewer infrastructure has not yet been upgraded/repared? A map of those occurrences in the Countywide Implementation Plan could provide more perspective on sanitary sewer issues.*

Response: All SSOs are evaluated and tracked; once an SSO occurs, that line is typically jetted and CCTV'd to see if there are any issues with the pipe and pipe joints. In the event there are issues, they are addressed through lining, replacing, etc. When there seems to be a location with multiple failures after the initial investigation, the wash frequency can be modified to reflect increased cleaning. If there seems to be a failing pipe, this could possibly lead to a larger project for replacements. The County also maintains a live, publicly-accessible map viewer of SSOs, which can be found here:

<https://gis.aacounty.org/portal/apps/experiencebuilder/experience/?id=355f46c14b794db293624bed2f14d783>

7. *Anne Arundel County demonstrated its progress toward meeting PCB TMDL SW- WLA through the development and implementation of PCB source tracking monitoring plans. MDE commends Anne Arundel County for the progress they've made in conducting several phases of source trackdown investigations within the Sawmill Creek subwatershed and for partnering with Montgomery and Howard County in the development and implementation of the source tracking plan in order to coordinate monitoring efforts in the Patuxent River to maximize efficiency and reduce cost.*

Response: No response required.

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8. On page 63, under the PCB TMDL Progress section for Baltimore Harbor (VII.A), the County states: *"The county is once again collaborating with UMBC on a Phase III monitoring effort in the Sawmill Creek watershed, as well as Phase I monitoring efforts in the Cabin Branch and Marley Creek subwatersheds."* Could you please provide the workplans for these monitoring activities in Appendix G (PCB TMDL Supporting Documents).

Response: Please refer to Proposal for PCB source tracking in Anne Arundel County- Phase 3 (2024) in Appendix G of this document for UMBC's work plan for this effort.

9. On page 64, under the PCB TMDL Progress section for Patuxent River (VII.B), the County states: *"The plan will be reviewed and potentially revised annually based on monitoring results and implementation and load reduction progress."* MDE would like to reiterate that the County is not expected to estimate load reductions in order to demonstrate progress towards meeting the PCB SW-WLA reduction goal.

Response: The County thanks MDE for this reminder; the County is not estimating load reductions as part of the PCB implementation plans and the referenced section has been updated.

10. On page 65, under the PCB TMDL Progress section for Patuxent River (VII.B), the County states: *"The plan builds upon the County's 2020 implementation plan, meets MDE's requirement to update previously approved TMDL plans by the end of the current MS4 permit term, and will include the development of a PCB monitoring plan in collaboration with Howard County, Montgomery County, Prince George's County, and Maryland State Highway Administration."* The County can remove Prince George's County and Maryland State Highway Administration from the statement as they are no longer collaborating partners in this monitoring effort.

Response: The County has updated this statement in section VII.B.