



**Bureau of Watershed Protection & Restoration**

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Annapolis, MD 21401

December 19, 2025

Ms. Gillian Adkins  
Natural Resources Planner  
Stormwater, Dam Safety, and Flood Management Program  
Water and Science Administration  
Maryland Department of the Environment  
1800 Washington Blvd.  
Baltimore, MD 21230

Subject: Anne Arundel County NPDES MS4 Permit # MD0068306 (20-DP-3316)  
Fiscal Year 2025 (FY25) Annual Report

Dear Ms. Adkins:

With this correspondence we are submitting Anne Arundel County's Fiscal Year 2025 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, 2024 through June 30, 2025. This is the fourth annual report for the above referenced Permit, issued Nov. 5, 2021. The County's Department of Public Works (DPW) Bureau of Watershed Protection and Restoration (BWPR) continues to coordinate Permit administration in collaboration with other County departments and bureaus.

As with previous submittals, all content and supporting documentation are provided electronically. Required geospatial datasets are submitted in Appendix A in accordance with MS4 Geodatabase Version 1.2 guidance, along with all narrative appendices and supporting files. The Report describes implementation of the County's stormwater management program; progress on impervious surface restoration; TMDL implementation status; public education and outreach activities; and compliance with all applicable permit conditions. Appendix A also includes stand-alone geodatabases specific to the County stormwater infrastructure, identification of commercial and industrial outfalls, and a stand-alone Excel workbook of biological and habitat data collected in FY25.

In addition to fulfilling annual reporting obligations under the Permit, the Report also serves as MDE's notice of reapplication for continued coverage under the Permit. The Report provides a comprehensive summary of the County's stormwater management programs and all of the permit-required activities undertaken throughout the current permit term. Specifically, it summarizes the effectiveness of the stormwater



management program, details the compliance status for each permit condition, and quantifies progress toward achieving established measurable goals and milestones. The Report demonstrates a full commitment to implementing the County's stormwater program and its continued progress towards pollution reduction targets. The County may provide additional recommendations and suggested permit language for the next-generation permit as MDE begins and moves through the drafting process. At this time, the County encourages the inclusion of language in the forthcoming permit that seeks to limit significant changes to permit conditions *during the permit term* - particularly to complex technical elements such as MS4 geodatabase requirements - and to allow adequate time for compliance when updates are necessary. These considerations are important to ensure effective implementation given the scale and complexity of the County's stormwater management program.

Specific compliance narrative reports and other supporting data (e.g., IDDE – FY25 Annual Report; Countywide TMDL Stormwater Implementation, Year 5 BMP Portfolio) are submitted in electronic format as Report appendices. Demonstration of sufficient funding to comply with Permit conditions is documented in the required FY25 WPRP Annual (Financial) Report. Additional financial information is found in the *FiscalAnalyses* table of the MS4 Geodatabase.

Information pertaining to the County's stormwater management facilities is found in the MS4 Geodatabase (Appendix A). Stormwater BMP data collection continues, with data from as-built plans entered into a database structure and geospatial framework designed to manage the County's inventory.

The cornerstone of the County's MS4 program is the mandated restoration of 2,998 equivalent impervious acres by November 2026. Through a combination of structural Best Management Practices (BMPs) and alternative control practices, the County successfully completed a cumulative restoration total of 2,697 acres, thereby exceeding the Year 4 benchmark. The County expects to meet its compliance goal in the final year of the permit.

The County maintains the necessary legal authority to comply with the permit, as evidenced by its Stormwater Management Practices and Procedures Manual and the continued delegation of erosion and sediment control enforcement authority through June 30, 2027. An updated organizational chart and responsible personnel list are provided in Part IV.A. Permit coordination continues to be led by BWPR, with representation from more than 60 staff across DPW, Inspections & Permits (I&P), and other County departments and bureaus.

In FY25, the IDDE program successfully conducted annual field screening on 163 major and minor outfalls within the targeted southern portion of the County, alongside visual surveys of 267 private commercial and industrial sites to identify potential upland pollutant sources. Complete documentation of IDDE activities, and any required follow-up enforcement actions, are found in Appendix C and the *IDDEScreening* and *NarrativeFiles* tables of the MS4 Geodatabase.

Overall, the County's compliance database logged 345 environmental complaints during FY25, all of which were investigated and enforced as appropriate.

As of November 2025, the County assessed all applicable properties and finalized draft GHPs for 73 qualifying County-owned facilities (e.g., parks, maintenance shops not covered by the Industrial General Permit). The draft GHPs for those properties can be found in Appendix D of the Report. The County provided draft GHPs for 10 additional properties in the FY24 annual report. All draft GHPs (total 83)



have now been submitted to MDE for review. Annual training for staff on the IDDE program is scheduled for FY26.

Information on application of de-icing materials during FY25 is found in Part IV.D.4.c of the Report and in the *ChemicalApplication* table of the M4 Geodatabase. The County is committed to reducing the use of winter deicing materials to protect the environment while maintaining public safety. To achieve salt reduction, the County implemented best practices in FY25, including procuring advanced equipment with AVL tracking and utilizing a Maintenance Decision Support System (MDSS) integrated with Road Weather Information System (RWIS) data. For reporting, the County began tracking road salt use per pound per lane mile per inch of snow for individual storm events.

The County continues supporting a robust and comprehensive environmental and stormwater outreach and education program through both online and social media platforms, as well as participation in restoration project-specific public meetings, restoration walks and community outreach events. The County program far exceeded the required 75 annual efforts, including presenting at over 60 events in FY25. The County also funds partnerships with the Chesapeake Bay Trust for restoration grants and the Watershed Stewards Academy (WSA) for public education activities. WSA trained residents who completed over 725 new restoration projects and engaged over 47,000 people in stormwater educational topics in FY25.

Furthermore, the County continued its stormwater restoration alternative control practices, which exceeded required benchmarks. Storm drain and catch basin cleaning activities prevented 313 tons of litter and debris from entering waterways, surpassing the annual benchmark of 174.5 tons.

The County's TMDL implementation update is described in the FY25 Countywide TMDL Stormwater Implementation Plan (Appendix H). This document provides annual implementation progress for all County TMDLS as required by the Permit. Additionally, FY25 progress is reported in the *LocalTMDLProgress* and *ChesapeakeBayProgress* tables of the MS4 Geodatabase. No new TMDLS, applicable to the County, were approved by EPA in FY25; however, the County is including two watershed implementation plan update drafts (Appendix H) for MDE review and approval. The Anne Arundel County Sediment TMDL Restoration Plan Update draft consolidates the restoration plans for all 9 local sediment TMDLS into one comprehensive plan. The Baltimore Harbor and Curtis Creek/Bay Polychlorinated Biphenyls (PCB) TMDL Implementation Plan Update draft and Sampling and Analysis Plan follows MDE's 2022 guidance for developing local PCB TMDL watershed implementation plans.

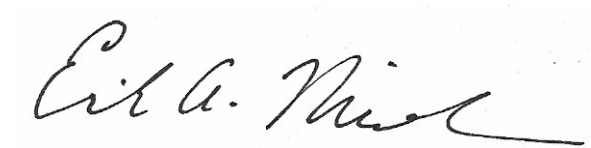
With respect to Assessment of Controls compliance, the County continues participation in the Pooled Monitoring Program (PMP) as coordinated through the Chesapeake Bay Trust (CBT) in lieu of all required BMP Effectiveness and Watershed Assessment Monitoring except Biological and Habitat monitoring (Appendix I).

Assessment of Controls includes PCB Source Tracking requirements, which the County is pursuing in coordination with University of Maryland Baltimore County (UMBC) in the Baltimore Harbor and Curtis Creek/Bay PCB TMDL watershed. Results of this monitoring work are appended to the Countywide TMDL Stormwater Implementation Plan (Appendix H).



We thank you for your consideration of the FY25 NPDES MS4 Annual Report and Appendices. Should you have any questions regarding the submittal content please contact me at 410-222-7520 or via email at [pwmich20@aaacounty.org](mailto:pwmich20@aaacounty.org).

Sincerely,



Erik Michelsen  
Senior Environmental Policy Officer  
Deputy Director  
Bureau of Watershed Protection and Restoration  
Department of Public Works

EM:MA

cc: Karen Henry, Director, DPW  
Brenda Morgan, Engineer Manager, BWPR  
Matt Gallagher, Planning Administrator, BWPR  
Douglas Griffith, Environmental Planner, BWPR

