

BALTIMORE COUNTY

Key Facts

Population¹	826,925	(3 rd of 10)
Impervious Acreage²	30,361	(2 nd of 10)
Current Permit		
Date of Issuance/Expiration	Dec 2013 / Dec 2018	
Impervious Acreage Restoration Goal	6,072 acres	
Spending		
Projected Annual Average ³	\$29.1 million	
Spending as a Percentage of County Budget ⁴	0.9%	(8 th of 10)
Spending as a Percentage of Median Household Income ⁵	0.13%	(9 th of 10)
Average Annual Residential Fee ⁶	\$39	

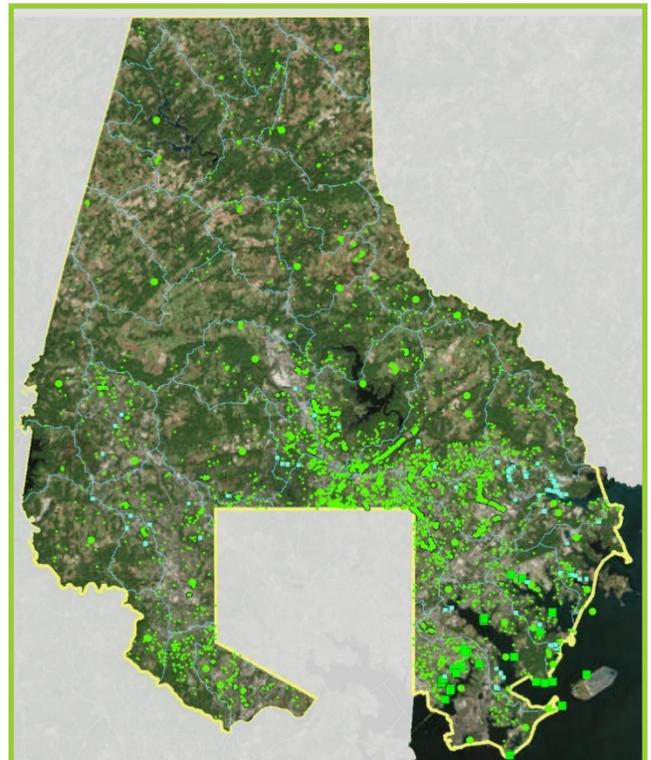
Summary of County Stormwater Plan and Effort

Summary: Baltimore County has a long history of undertaking innovative watershed restoration projects, which is why the county's recent submission of its Financial Assurance Plan (FAP) is so disappointing. The FAP is a required by state law essentially to address the very situation now facing Baltimore County. That 2015 law allowed counties to repeal their stormwater remediation fees if they can first show that the repeal will not affect the ability of the county to meet their stormwater permit obligations and watershed protection and restoration goals. Baltimore County repealed their fee in 2015 and then submitted a plan (weeks late) that comes far short of identifying the projects needed to fulfill its obligations to the state under its permit and to its residents to protect their waterways.

Basics: Baltimore County received its current stormwater permit under the Clean Water Act by the Maryland Department of the Environment (MDE) on December 23, 2013. This permit requires, among other things, that the county restore 20 percent of the untreated impervious surfaces within its municipal separate storm sewer system (MS4) by the end of the five-year permit term, expiring in December 2018.

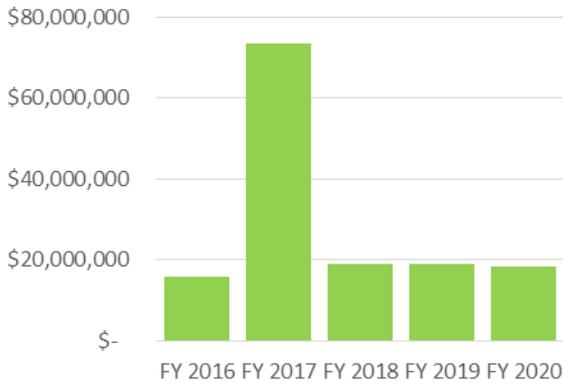
According to the county, its MS4 system contained 30,361 acres of untreated impervious surfaces, of which it must restore 6,072 acres. According to the FAP, as of mid-2016, Baltimore County has treated the equivalent of about 240 impervious acres with county capital projects and the equivalent of almost 1,000 additional acres of impervious surfaces treated through practices like street sweeping, septic system pumping, and other alternative projects and practices.

Level of Effort: The county's repeal of its stormwater fee was problematic for two reasons. First, the average residential fee was of below average size compared to other stormwater fees in Maryland and the hundreds of such fees collected around the country, but still delivered a steady stream of more than \$23 million per year to be put to use in improving local water



Sub-watersheds are delineated with light blue lines. Completed impervious surface and watershed restoration projects are shown in bright green with the associated impervious areas treated in darker green. Linear restoration projects are represented by thick blue.

Restoration Spending



quality and community health and creating local construction and engineering jobs. Additionally, the repeal of the fee has left Baltimore County with a very large funding gap reflected in its plan, despite capacity in its capital budget and a top-notch AAA credit rating to ensure low borrowing costs for financing county projects.

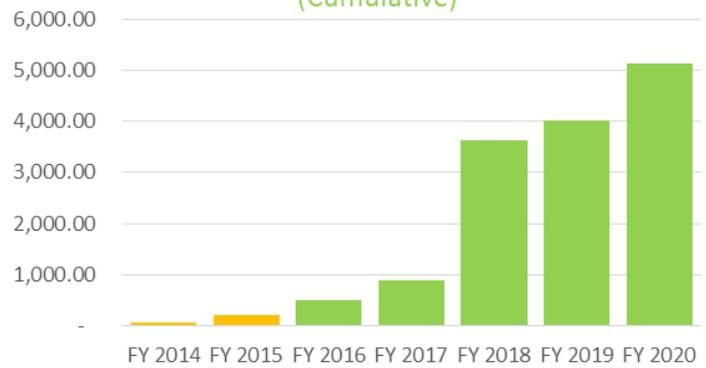
The level of spending on stormwater pollution control and watershed protection and restoration by Baltimore County is relatively low by just about any measure. For instance, the impervious surface restoration spending identified in the county's FAP ranked 9th out of 10 counties on a per capita basis, 8th as a percentage of the overall county budget, and last (10th) both as a percentage of median household income and as a measure of spending per acre of impervious surfaces in the county.

Restoration Strategy: Ideally, stormwater management plans should include a diverse mix of the various types of water quality restoration projects and practices available, but with a significant emphasis on carefully designed and site-specific projects that allow rainwater and snow melt to infiltrate into the ground and filter harmful nutrients, sediment, and toxic substances rather than ending up as polluted runoff to neighborhood creeks and other county waters. Building this "green infrastructure" into the urban landscape has proven to be one of the most beneficial and high impact environmental policies that local governments can undertake.

As noted, Baltimore County has a long history of stormwater management and watershed restoration work. This work has consisted primarily of stream restoration and shoreline enhancement projects throughout many of the county's waterways. This experience seems likely to dictate future strategy as well, with the county's FAP showing a significant number of stream and shoreline projects in the works, with a lesser focus on structural stormwater retrofits and other green infrastructure projects designed to directly treat impervious surfaces.

A bigger concern for the county, however, is the significant reliance on low value practices and the large gap in the county's plan to meet its permit obligations and restore local waters. For example, beginning with the current permit in 2014, the county started using practices like street sweeping and septic system treatments to meet a significant portion of its permit requirements, which are technically given credit by the state for stormwater permit compliance, but which do very little to address the issues caused by stormwater. Worse yet, because the county failed to identify funding for enough stormwater projects (or even lower value practices like sweeping) to meet permit obligations, the county is planning to bridge the gap by engaging in "nutrient trading" without any explanation of what that means for county waters. For example, there is no discussion regarding why the nutrient trades have no estimated cost, about contingency plans if a nutrient trading market does not exist, or whether it is realistic to expect such a large number of nutrient credits to be available. Because the county's financial assurance plan was submitted late with little input by the public and with so many deficiencies, the only appropriate course would be for MDE to send the plan back to Baltimore County for revision.

Acres Restored by Projects (Cumulative)



Notes

- ¹July 2014 Estimate, Maryland Department of Planning
- ²MS4 Annual Report and Financial Assurance Plan (FAP)
- ³FAP
- ⁴Uniform Financial Reporting for Fiscal 2013 and FAP
- ⁵U.S. Census and FAP
- ⁶The fee has since been repealed by Baltimore County.

For More Information
Contact: [Evan Isaacson](#)