

CHARLES COUNTY

Key Facts

Population¹	154,747	(10 th of 10)
Impervious Acreage²	7,048	(9 th of 10)
Current Permit		
Date of Issuance/Expiration	Dec 2014 / Dec 2019	
Impervious Acreage Restoration Goal	1,410 acres	
Spending		
Projected Annual Average ³	\$14.7 million	
Spending as a Percentage of County Budget ⁴	2.0%	(2 nd of 10)
Spending as a Percentage of Median Household Income ⁵	0.29%	(4 th of 10)
Average Annual Residential Fee	\$35	

Summary of County Stormwater Plan and Effort

Summary: Charles County has plans to spend a considerable amount of money for stormwater pollution reduction and watershed restoration projects. Unfortunately, the strategy unveiled by the county in its recently released Financial Assurance Plan (FAP), which details how the county plans to meet its stormwater permit obligations, is not likely to result in significant benefits for water quality for county residents. Specifically, the plan describes a sort of environmental accounting gimmick as its preferred method to comply with its stormwater permit, rather than investing in the projects that would actually generate water quality improvements and the local engineering and construction businesses that would build these projects.

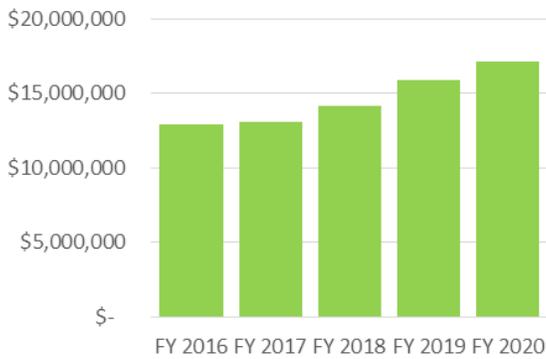
Basics: Charles County received its current stormwater permit under the Clean Water Act by the Maryland Department of the Environment (MDE) on December 26, 2014. This permit requires, among other things, that the county restore 20 percent of the untreated impervious surfaces within its municipal separate storm sewer system (MS4) by the end of the five-year permit term, expiring in December 2019. According to the county, its MS4 system contained 7,048 acres of untreated impervious surfaces, of which 1,410 acres (20 percent) must be restored. Very few projects to treat impervious surfaces have been completed under the current permit, with the bulk of projects identified in the FAP planned for completion between 2017 and 2019.

Level of Effort: Charles County assesses a unique stormwater remediation fee, which is a flat fee for each property, regardless of size or use (e.g., residential, commercial). This fee structure, along with the relatively low level, generates only a modest amount of revenue for the county's stormwater remediation and watershed protection and restoration work. Instead, a significant majority of the county's funding for this work is expected to come



Urban areas are shown in light gray shading.
Sub-watersheds are delineated with light blue lines.
Completed impervious surface and watershed restoration projects are shown in bright green.

Restoration Spending



from county general obligation bonds, a wise decision as the county enjoys a top-notch AAA bond rating ensuring low borrowing costs to finance these high value capital projects. Overall, the county’s spending plan identified in its FAP provides a relatively robust level of funding for stormwater work, given the size of the county and its budget.

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 where harmful nutrients, sediment, and toxic substances can be filtered rather than ending up in local waters. Building this “green infrastructure” into the

urban and suburban landscape has proven to be one of the most beneficial and high impact environmental policies that local governments can undertake.

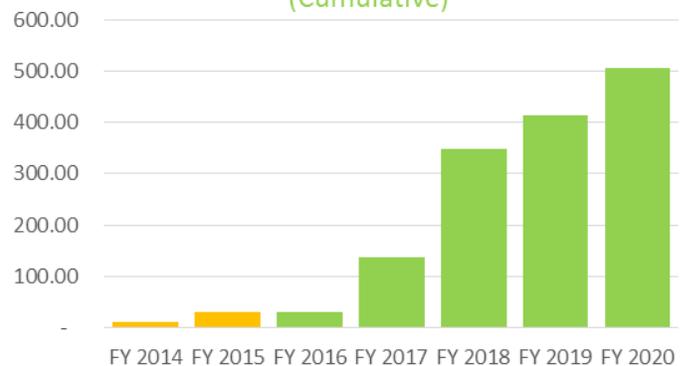
Charles County’s plan, by contrast, is to rely on high impact green infrastructure projects, along with a few stream and shoreline projects, for less than half of its stormwater permit compliance work. The county also plans to implement lower value practices like street sweeping operations and various practices related to septic systems for additional permit compliance work. But the primary concern for the Charles County plan is that it only identifies enough stormwater projects and alternative compliances practices to achieve half of the county permit’s 20 percent impervious surface restoration requirement. The other half of the county’s permit compliance work involves a sort of accounting scheme whereby the county plans to claim “credit” for unused capacity in county-owned sewage plants.

Several concerns arise from this plan to use an accounting gimmick under the guise of “nutrient trading.” First, the state has not yet established a nutrient trading market, and neither the county permit, nor the guidance document governing permit compliance, discuss how to account for nutrient trades. More importantly, the county has specifically stated that this plan to claim nutrient credits involves no actual purchase actual of nutrient credits, which would presumably be accompanied by actual pollution reduction projects. In other words, the county plans to meet half of its stormwater pollution reduction obligation by doing nothing at all to reduce pollution or restore local waters.

Under a legitimate nutrient credit exchange, the county would pay another entity, generally a farmer, but possibly a sewage or industrial facility, to reduce pollution within the same watershed. Charles County’s compliance strategy is to not purchase any nutrient credits or otherwise reduce pollution into local waters.

Overall, Charles County citizens have a reason to be concerned about their county’s plans to reduce water pollution in their communities. While the county has dedicated a reasonable level of funding for some promising stormwater and watershed restoration projects, it has also come far short of devising a plan that will result in the restoration of county waters. The scheme to claim credit for unused capacity at its sewage plants (which themselves have exceeded pollution limits in the past) is both bad for water quality and likely not lawful. Charles County residents deserve a better investment of their taxpayer dollars.

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

For More Information
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