

HARFORD COUNTY

Key Facts

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|--|---------------------|-------------------------|
| Population¹ | 250,105 | (7 th of 10) |
| Impervious Acreage² | 9,413 | (7 th of 10) |
| Current Permit | | |
| Date of Issuance/Expiration | Dec 2014 / Dec 2019 | |
| Impervious Acreage Restoration Goal | 1,883 acres | |
| Spending | | |
| Projected Annual Average ³ | \$11.4 million | |
| Spending as a Percentage of County Budget ⁴ | 1.1% | (6 th of 10) |
| Spending as a Percentage of Median Household Income ⁵ | 0.15% | (7 th of 10) |
| Average Annual Residential Fee | N/A | |

Summary of County Stormwater Plan and Effort

Summary: Harford County's recently submitted Financial Assurance Plan (FAP) detailing its strategy to reduce polluted urban runoff and restore local waterways will unfortunately do little to accomplish either of these goals. The county's planned spending on water quality improvement projects is relatively low and its strategy consists of many low impact projects and environmental accounting gimmicks. County residents and state and local officials ought to be asking tough questions about how this plan can be improved.

Basics: Harford County received its current stormwater permit under the Clean Water Act by the Maryland Department of the Environment (MDE) on December 30, 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 9,413 acres of untreated impervious surfaces, of which 1,883 acres (20 percent) must be restored. Very few capital projects to treat impervious surfaces have been completed to date under the current permit.

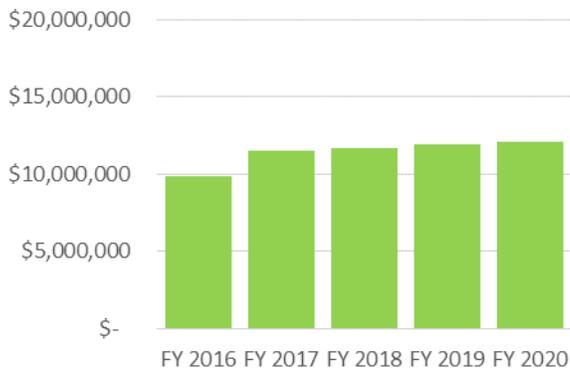
Level of Effort: At one point, Harford County had a promising plan to raise funds needed to address local water quality. After the Maryland General Assembly passed the law requiring Baltimore City and the nine largest counties in the state to create stormwater remediation fees, Harford County established an eminently reasonable plan to levy a modest fee with a phase-in period that would gradually increase the fee over time as the county's restoration plan moved forward. A few years later, Harford County has repealed its fee altogether and, as indicated in the recently submitted county FAP, replaced it with a negligible source of dedicated funding consisting of a small fraction of an existing local tax. This lack of significant dedicated funding could be one reason that the county's level of effort to implement stormwater and watershed restoration plans is deficient.

The county's level of effort, by most measures, is below average compared to other jurisdictions in Maryland. For example, spending on the impervious surface restoration plan identified in its FAP ranks 7th (among the 10 jurisdictions) on a per capita basis, 6th out of 10 as a percentage of the county's overall budget, and 7th as a



Urban areas are shown in light gray shading.
Sub-watersheds are delineated with light blue lines.

Restoration Spending



percentage of median household income. Additionally, this spending identified in the FAP, when divided by the number of impervious acres ranks third to last (8th of 10). Finally, the capital spending on stormwater management and watershed restoration programmed in the county’s six-year Capital Improvement Plan ranks 6th out of the 10 counties on a dollar per capita basis.

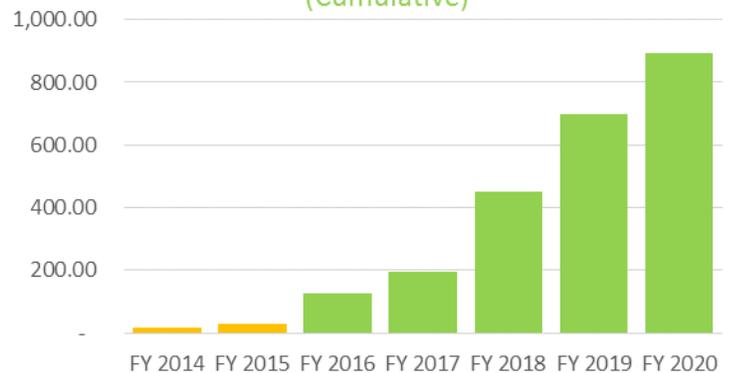
Harford County has relatively low debt levels, as confirmed by top-notch bond ratings. It is not unreasonable to suggest that the county has sufficient capacity in its capital budget to do much more to protect the local waterways and community health throughout the county from the impact of polluted runoff. Importantly, each dollar invested in these projects is a substantial and enduring investment in the local economy and local, high-paying jobs.

Restoration Strategy: Harford County’s plan to comply with the impervious surface restoration plan in its stormwater permit involves very few projects that actually deal with impervious surfaces or reduce the volume or concentration of pollutants in stormwater runoff. Ideally, stormwater management plans should significantly emphasize the use of carefully designed and site-specific projects that allow rainwater and snow melt to infiltrate into the ground and filter out harmful nutrients, sediment, and toxic substances instead of ending up as polluted runoff to local waters. Unfortunately, Harford County’s plan included in its FAP relies very little on such projects, with a greater reliance instead on practices like septic system pumping, which does nothing to mitigate the impact of polluted urban runoff from stormwater and carries none of the environmental, health, or economic benefits of investments in innovative stormwater projects designed to treat or eliminate impervious surfaces.

However, by far the most concerning aspect of Harford County’s plan is a sort of environmental accounting gimmick that the county has devised to claim pollution reduction credit by “trading with the county wastewater treatment plant.” No other details are provided in the FAP, but the county claims that, for no cost, it will acquire pollution reduction credits from the county-owned wastewater treatment plant. At this point, no nutrient trading program exists in Maryland and the regulations to govern any future program have not yet been proposed. But it is unlikely that such a scheme will be adopted since no nutrient trading market can possibly exist if the those that would seek to pay for pollution reduction credits can simply obtain an inexhaustible supply of them for free from nearby sewage plants.

Finally, it is worth highlighting that Harford County devoted considerable space in its FAP to describing its objections to stormwater and watershed restoration efforts rather than actually devising plans to improve county water quality. But Harford County is in a poor position to make these objections. The county asserts that the amount of money that it must spend to reduce stormwater pollution is greater than what would be considered the “maximum extent practicable” required under federal law. If Harford County could demonstrate that it was spending far more than other jurisdictions or had no additional spending capacity in its capital budget, it might have a reasonable basis to argue that its obligations were greater than what is deemed practicable. Instead, as noted, Harford County’s level of effort is by most measures below that of other jurisdictions in Maryland.

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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