



Restoration Plan for the Piscataway Creek Watershed in Prince George's County















December 30, 2015

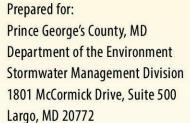






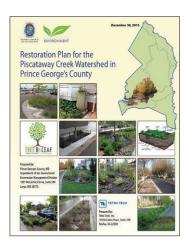












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December 30, 2015





# Prepared for:

Prince George's County, Maryland Department of the Environment Stormwater Management Division

# Prepared by:



10306 Eaton Place, Suite 340 Fairfax, VA 22030



### COVER PHOTO CREDITS:

- 1. M-NCPPC \_Cassi Hayden
- 2. USEPA
- 3. Montgomery Co DEP
- 4. PGC DoE
- 5. USEPA
- 6. USEPA
- 7. VA Tech, Center for TMDL and Watershed Studies
- 8. Montgomery Co DEP
- 9. Prince George's County
- 10. CA Dept of Public Works
- 11. USEPA
- 12. USEPA
- 13. Portland Bureau of Environmental Services \_Tom Liptan

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# **ACRONYM LIST**

B-IBI Benthic Index of Biotic Integrity

BMP best management practice
BOD biochemical oxygen demand
CBP Chesapeake Bay Program
CIP Capital Improvements Program
COMAR Code of Maryland Regulations

CWP Clean Water Partnership

DO dissolved oxygen

DoE [Prince George's County] Department of the Environment DPW&T [Prince George's County] Department of Public Works and

Transportation

EPA U.S. Environmental Protection Agency

ESD environmental site design

GIS geographic information system

HOA homeowner association
JBA Joint Base Andrews
LA load allocation

lb pound

MAST Maryland Assessment and Scenario Tool
MDE Maryland Department of the Environment

MDP Maryland Department of Planning

mg/L milligrams per liter

mL milliliters

M-NCPPC Maryland-National Capital Park and Planning Commission

MOS margin of safety

MPN most probable number

MPN B most probable number in billions

MS4 municipal separate storm sewer system

NPDES National Pollutant Discharge Elimination System

P3 Public-Private Partnership Program

PCB Polychlorinated biphenyl

ROW right-of-way

SSO sanitary sewer overflow STORET STOrage and RETrieval

SWM Program
SWMM
Storm Water Management Program
SWPPP
Storm Water Management Model
stormwater pollution prevention plans

TMDL total maximum daily loads

TNI Transforming Neighborhoods Initiative

TSS total suspended solids

UMCES University of Maryland Center for Environmental Science

USDA U.S. Department of Agriculture

USGS U.S. Geological Survey

WECR Watershed Existing Conditions Report

WIP Watershed Implementation Plan

WLA wasteload allocation

WSSC Washington Suburban Sanitary Commission

WTM Watershed Treatment Model

# 1 INTRODUCTION

On January 2, 2014, the Maryland Department of the Environment (MDE) issued Prince George's County (the County) a new municipal separate storm sewer system (MS4) permit. An MS4 is a series of stormwater sewers owned by a municipal entity (e.g., the County) that discharges the conveyed stormwater runoff into a water body (e.g., Northeast Branch). The County's new MS4 permit requires that the County develop local restoration plans to address each U.S. Environmental Protection Agency (EPA)-approved total maximum daily load (TMDL) with stormwater wasteload allocations (WLAs). A TMDL can be seen as a *pollution diet* in that it is the maximum amount of a pollutant that a water body can assimilate and still meet water quality standards and designated uses. As a result of the County's new MS4 permit, restoration plans are being developed for all water bodies in the County that are subject to TMDL WLAs associated with the MS4 system. The County's MS4 system has been assigned WLAs in the Piscataway Creek watershed.

The Piscataway Creek watershed lies across the southwestern portions of the County (Figure 1-1). It includes no incorporated municipalities. The watershed also contains a large area of federal land (Joint Base Andrews [JBA], Federal Law Enforcement Training Center) as well as some state-owned land (Cheltenham Boys Village).

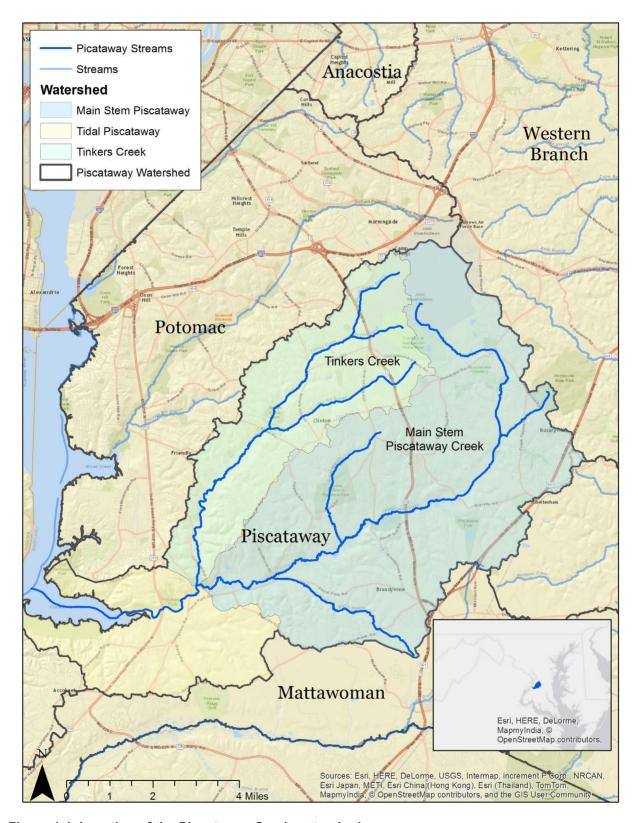


Figure 1-1. Location of the Piscataway Creek watershed.

# 1.1 Purpose of Report and Restoration Planning

### 1.1.1 What is a TMDL?

Section 303(d) of the Clean Water Act and EPA's Water Quality Planning and Management Regulations (codified at Title 40 of the *Code of Federal Regulations* Part 130) require states to develop TMDLs for impaired water bodies. TMDLs provide the scientific basis for a state to establish water quality-based controls to reduce pollution from both point and nonpoint sources to restore and maintain the quality of the state's water resources (USEPA 1991).

A TMDL (pollution diet) establishes the amount of a pollutant that a water body can assimilate without exceeding its water quality standard for that pollutant and is represented as a mass (e.g., pound) per unit of time (e.g., day). The mass per unit time is called the load. For instance, a TMDL could stipulate that a maximum load of 1,000 pounds of sediment per day could be discharged into an entire stream. The pollution diet for a given pollutant and water body is composed of the sum of individual WLAs for point sources and load allocations (LAs) for nonpoint sources and natural background levels. In addition, the TMDL must include an implicit or explicit margin of safety (MOS) to account for the uncertainty in the relationship between pollutant loads and the quality of the receiving water body. The TMDL components are illustrated using the following equation:

$$TMDL = \Sigma WLA_S + \Sigma LA_S + MOS$$

A WLA is the portion of the overall pollution diet that is assigned to permitted dischargers, such as the County's MS4 stormwater system. The County's new MS4 permit requires that the County develop local restoration plans to address each EPA-approved TMDL with stormwater WLAs.

Figure 1-2 shows a generalized TMDL schematic. A TMDL identifies the maximum amount of pollutant load that the water body can receive and still meet applicable water quality criteria. The bar on the left represents the current pollutant load (sometimes called the baseline) that exists in a water body before a TMDL is developed. The elevated load causes the water body to exceed water quality criteria. The bar on the right represents the amount that the pollutant load will need to be reduced for the water body to meet water quality criteria. Another way to convey the required load reduction is by identifying the *percent reduction* needed. Table 1-1 presents the percent reductions—as presented on MDE's *TMDL Data Center* website (MDE 2014c)—required for the water bodies in the Piscataway Creek watershed to meet criteria.

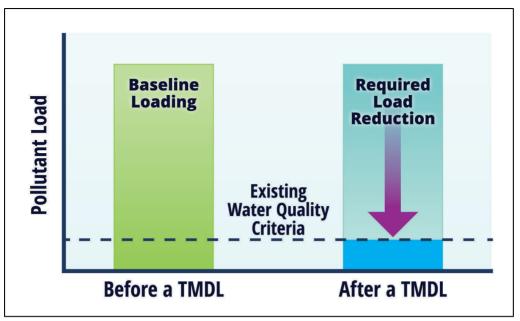


Figure 1-2. Schematic for typical pollution diet (TMDL).

Table 1-1. Required percent reductions for the Piscataway Creek watershed in Prince George's County

Water Body	Pollutant	Percent Reduction to Stormwater
Tinkers Creek	Fecal coliform bacteria (Escherichia coli)	80.7%
Main Stem of Piscataway Creek	Fecal coliform bacteria (Escherichia coli)	82.8%

### 1.1.2 What is a Restoration Plan?

A restoration plan is a strategy for managing the natural resources within a geographically defined watershed. For the County's Department of the Environment (DoE), this means managing urban stormwater (i.e., runoff originating from rain storms) to restore and protect the County's water bodies. Stormwater management is most effective when viewed in the watershed context—watersheds are land areas and their network of creeks that convey stormwater runoff to a common body of water. Successful stormwater management consists of both structural practices (e.g., vegetated roadway swale) and public outreach (e.g., pet waste campaigns and education) at both the public and private levels. The restoration plan development process will address changes that are needed to the County's priorities to comply with water quality regulations, to improve the health of the streams in the County, and to create value for neighborhoods in the County's watersheds.

The overall goals of restoration planning are to:

- Protect, restore, and enhance habitat in the watershed.
- Restore watershed functions, including hydrology, water quality, and habitat, using a balanced approach that minimizes negative impacts.
- Support compliance with regional, state, and federal regulatory requirements.

■ Increase awareness and stewardship within the watershed, including encouraging policymakers to develop policies that support a healthy watershed.

This document (the Plan) represents the first stage in achieving these goals. This plan is not meant to be site-level planning, but rather focuses on watershed-based planning. For the Piscataway Creek, the restoration planning process began with the development of the *Piscataway Creek Watershed Existing Conditions Report* (WECR) that reviewed available data and began the process of identifying the causes and sources of pollution. The restoration planning process seeks to:

- Identify causes and sources of pollution.
- Estimate pollutant load reductions.
- Describe management options and identify critical areas.
- Estimate technical and financial assistance needed.
- Develop an education component.
- Develop a project schedule.
- Describe interim, measurable milestones.
- Identify indicators to measure progress.
- Develop a monitoring component.

The Plan presents this information in six major sections:

- Section 2 Watershed Characterization summarizes the information from the WECR and identifies the causes and sources of pollution.
- Section 3 Restoration Plan Goals and Objectives outlines the specific goals and objectives for the Piscataway Creek and describes the annual load reduction estimates needed to meet the goals and objectives.
- Section 4 Current Management Activities identifies the current pollution-reduction activities that the County has installed, the County's programmatic initiatives, and the estimated pollutant load reduction from these activities.
- Section 5 Strategy Development documents the approach for identifying and prioritizing management options.
- Section 6 Implementation Plan provides details on the proposed management activities, estimated costs, and load reductions, and outlines the proposed schedule, funding and technical resources, and public involvement process for implementation.
- Section 7 Tracking and Adaptive Management outlines the approach for tracking and monitoring implementation progress and adaptive management.

# 1.2 Impaired Water Bodies and TMDLs

MDE has included the Piscataway Creek and its tributaries on its section 303(d) list of impaired waters because of the following pollutants (listing year in parentheses):

Fecal coliform bacteria (2002 nontidal waters and 2004 tidal waters)

In addition, EPA recently (2010) developed an overall TMDL for the Chesapeake Bay watershed for nitrogen, phosphorus, and sediment. The County has developed a Watershed Implementation Plan (WIP), which includes the Piscataway Creek watershed, in response to the Chesapeake Bay TMDL (PGC DER 2012b). This restoration plan addresses the TMDLs for fecal coliform bacteria.

# 1.2.1 Water Quality Standards

Portions of the Piscataway Creek have the following designated uses (*Code of Maryland Regulations* [COMAR] 26.08.02.08 O):

- Use Class I: Water Contact Recreation, and Protection of Nontidal Warmwater Aquatic Life
- Use Class II: Support of Estuarine and Marine Aquatic Life and Shellfish Harvesting
- Use Class III: Nontidal Cold Water
- Use Class IV: Recreational Trout Waters

Maryland's General Water Quality Criteria states that "the waters of this State may not be polluted by...any material, including floating debris, oil, grease, scum, sludge and other floating materials attributable to sewage, industrial waste, or other waste in amounts sufficient to be unsightly; produce taste or odor; change the existing color to produce objectionable color for aesthetic purposes; create a nuisance; or interfere directly or indirectly with designated uses" [COMAR 26.08.02.03B(2)].

Table 1-2 presents the Maryland water quality standards for bacteria applicable for all areas.

Table 1-2. Maryland bacteria water quality criteria

Indicator	Steady-State Geometric Mean Indicator Density					
Freshwater						
E. coli	126 MPN/100 mL					
Enterococcia	33 MPN/100 mL					
Marine Water						
Enterococci	35 MPN/100 mL					

Notes:

MPN=most probable number; mL=milliliters.

### 1.2.2 Problem Identification

This section provides a summary of the various problems identified in the Piscataway Creek watershed and the data supporting the impairment decisions. Tidal impairments and listings are discussed first, followed by nontidal impairments.

Nontidal portions of the Piscataway Creek are impaired because of fecal coliform bacteria. The 1993–1995 Maryland Water Quality Inventory provided the original narrative basis for the nutrients and BOD listings, indicating that high levels of bacteria were the primary causes of

<sup>&</sup>lt;sup>a</sup> Used in the Piscataway Creek TMDL analysis.

impaired water quality in the nontidal portions of the watershed. These nontidal waters comprise the Main Stem of Piscataway Creek and Tinkers Creek. In most sites in nontidal Piscataway Creek, the biological indices categorize the condition of both the benthic and fish communities as Poor to Fair.

For the nontidal waters of the Piscataway Creek, fecal bacteria listings were based on a comparison of the criterion value (126 most probable number [MPN] *Eschericia coli, or E. coli*) with calculated annual and seasonal steady-state geometric means for different flow strata. The steady-state condition is defined as "unbiased sampling targeting average flow conditions and/or equally sampling or providing for unbiased sampling of high and low flows" (MDE 2006). The steady-state condition is determined through monitoring design or statistical analysis. In the case of this TMDL, the monitoring was routine (i.e., it did not stratify monitoring such that samples collected were proportional to the duration of time the watershed experiences low, medium, and high flows). The assessment process involved separating monitoring data into flow categories to calculate the steady-state geometric mean with respect to flow regimes. Data were then compared to criteria and the impairment assessment was made. As part of the TMDL process, MDE performed bacteria source tracking in the watershed, the results of which are included in Table 1-3. The main sources of bacteria are wildlife followed by pet waste, and then humans (via septic systems, sanitary sewer overflows, and municipal wastewater treatment plants).

Table 1-3. Bacteria source tracking results

Subwatershed	Monitoring Station	Percent Human	Percent Pet	Percent Livestock	Percent Wildlife
Main Stem of Piscataway Creek	PIS0045	32.5%	9.7%	17.7%	40.1%
Tinkers Creek	TIN0006	30.3%	15.0%	9.4%	45.3%

Source: MDE 2006.

### 1.2.3 Previous Studies

In 2011, the County developed a countywide Chesapeake Bay WIP in response to the 2010 Chesapeake Bay Nutrient and Sediment TMDL. The WIP was finalized in 2012 and laid out a plan for best management practice (BMP) implementation and other restoration activities through 2017 and 2025. In addition to urban stormwater runoff, the WIP covered agricultural practices and upgrades to wastewater systems (i.e., municipal wastewater treatment plants and on-site wastewater systems). Although the WIP addresses all of the County's land areas, many elements of the WIP apply to the Piscataway Creek and will be used to develop the restoration plan. The County's final WIP can be viewed at

www.mde.state.md.us/programs/Water/TMDL/TMDLImplementation/Documents/FINAL\_PhaseII\_Report\_Docs/Final\_County\_WIP\_Narratives/PG\_WIPII\_2012.pdf.

In 2008, the County commissioned a state-of-the-art watershed analysis of Piscataway Creek titled *Piscataway Watershed Assessment 2008/2009*. This analysis included several reports relevant to the current study: (1) TASK 2.A. Land Use Analysis Final Report, (2) TASK 2.B. Flow Duration Analysis Final Report, and (3) TASK 2.G. Pollutant Loading Analysis Final Report. The findings

of these reports were summarized in the Piscataway Creek Watershed Characterization 2011, prepared by the County.

The first report was a thorough land use/land cover analysis. It not only characterized the impervious and pervious land covers, but also determined how much of that impervious area was connected to stormwater outfalls through a stormwater network and how much was disconnected impervious that flowed over the adjacent turf or field areas. A notable example of this is the runways at JBA.

The second report presented the results of a detailed Stormwater Management Model (SWMM) study that used aquifers to partition runoff into overland and subsurface flow regimes. This model was calibrated to the U.S. Geological Survey (USGS) gauge 1653600 for the 2000 water year, which included Hurricane Floyd. A salient finding of that study was that disconnection was a very important component of the water balance. This study showed great variations in stream power depending upon the extent of connected impervious area.

The third report used the SWMM partitioning of overland runoff as opposed to subsurface flows to project cumulative pollutant loads. Because many particulate pollutants such as total suspended solids (TSS), particulate phosphorus, particulate nitrogen, and fecal coliform are filtered by the soil profile, the runoff volumes conveyed by disconnected pathways are substantially attenuated. By accounting for these variables, the final pollutant loading analysis highlighted major differences in the type and volume of pollutant loads.

# 2 WATERSHED CHARACTERIZATION

This section provides a general characterization of the watershed. The main purpose of this section is to give the reader an understanding of different conditions in the watershed. Additional details on watershed characterization can be found in the *Piscataway Creek Watershed Existing Conditions Report* (Tetra Tech 2014a).

### 2.1 General

The Piscataway Creek watershed is made up of two major subwatersheds. The mainstem of the Piscataway Creek is 18.2 miles long, beginning at JBA and ending at the Potomac River below Washington, D.C. across from Mt. Vernon. The watershed is 67.6 square miles. It has been inhabited for more than 4,000 years, but European colonization began in the 1700s. Historically a predominately forested watershed, agriculture dominated through the late 1800s, after which time urbanization began to replace agricultural land uses. Currently, the northern portion of the watershed is almost fully developed into the communities of Clinton, Camp Springs and JBA, surrounded by medium- and low-density residential development.

The southern region comprises the area between Louise F. Cosca Regional Park and the Main Stem and tidal Piscataway Creek drainages. The land use to the south is mostly forested, with some open and row-crop agricultural land. There is extensive low-density residential development, with some commercial and light industrial. Butler Branch (tributary to Piscataway Creek) flows through Louise F. Cosca Regional Park and forms a lake within the park. To the south the land is more forested and agricultural, with the encroachment of many new home estates. There is extensive suburban development along the Indian Head Highway (Route 210).

# 2.2 Hydrology

There are also several named tributaries to these mainstem creeks. In the Piscataway Creek watershed, these comprise Burch Branch, Butler Branch, Dower House Branch, and many other unnamed tributaries. In Tinkers Creek, these comprise Meetinghouse Branch, Pea Hill Branch, and Haynes Branch. Below the confluence with Tinkers Creek, the Piscataway becomes tidal for the remaining 2.8 miles. The creek and its tributaries follow a dendritic pattern, a branching tree-like effect. The main source of water to the creek in the coastal plain is ground water. Because unconsolidated sediments underlie the region, precipitation usually sinks in easily. The majority of the land in the northern watershed is drained by MS4 outfalls. The tributary system of Tinkers Creek is described as *flashy*, meaning there is a quick rise in stream level due to rainfall as a result of its high proportion of directly connected impervious area. Its streams have storm flow rates many times higher than that from the rural and forested subwatersheds in the southeast.

Weather is an important factor in the hydrology of a region and is the driving factor in stormwater runoff. For the County, the National Weather Service Forecast Office (2014b) reports a 30-year average annual precipitation of 39.74 inches. No strong seasonal variation in precipitation exists. On average, winter is the driest with 8.48 inches, and summer is the wettest with 10.44 inches (National Weather Service Forecast Office 2014a). Evapotranspiration accounts for water that evaporates from the land surface (including water bodies) or is lost through plant transpiration.

Evapotranspiration varies throughout the year because of climate, but is greatest in the summer. Potential evapotranspiration (Table 2-1) is the environmental demand for evapotranspiration.

Table 2-1. Average monthly (1975–2004) potential evapotranspiration (inches)

January		February	March		April	May	June
	0.60	0.86		1.69	2.74	3.86	4.30
July		August	September		October	November	December
	4.59	4.01	:	2.85	1.88	0.98	0.62

Source: Northeast Regional Climate Center (NRCC) 2014.

### 2.3 Soils

The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service has defined four hydrologic soil groups, providing a means for grouping soils by similar infiltration and runoff characteristics during periods of prolonged wetting. Poorly drained clay soils (Group D) have the lowest infiltration rates, resulting in the highest amount of runoff, while well-drained sandy soils (Group A) have high infiltration rates, with little runoff.

The greatest proportion of the watershed is underlain by group C soils (45 percent in Tinkers, 46 percent in the Main Stem of Piscataway Creek), with a substantial amount of group B soils (30 percent in both). The balance is largely group D soils, located along the valley bottoms where little development occurs. Group A is the least represented in the watersheds (less than 1 percent). Soils in the watershed are also frequently classified as "urban land complex" or "udorthent" soils. These are soils that have been altered by disturbance because of land development activities. Soils affected by urbanization can have a higher density because of compaction during construction activities, and might be more poorly drained. Natural pervious land covers on group B soils generate very little runoff compared to that from disturbed soils.

### 2.4 Land Use and Land Cover

Land use, land cover, and impervious area are some of the most important factors that influence the amount of pollution entering the County's water bodies. Pollutant loadings, like nitrogen or bacteria, vary by land use (e.g., commercial, agriculture, parks). As impervious area increases, so does the amount of runoff a rain event produces, thus transporting more pollutants to a water body in a shorter period of time.

### 2.4.1 Land Use Distribution

Maryland Department of Planning (MDP) 2010 land use update (MDP 2010) data are available as geographic information system (GIS) data, so these data are being used in the restoration plan. Land uses are made of many different land covers, such as roads, roofs, turf, and tree canopy. The proportion of land covers in each land use control the hydrologic and pollutant loading response of such uses

Figure 2-1 shows the 2010 MDP land use for the entire Piscataway Creek watershed. Table 2-2 summarizes the areas. The urban area in the watershed is largely residential land (31 percent of the watershed), with the majority being medium-density residential (42 percent of urban land). There are also significant areas of forested land (43 percent); institutional land (such as schools, government buildings, and churches) (8 percent); and commercial/industrial land (2 percent). The large area of institutional land in the northern part of the County is AAFB.

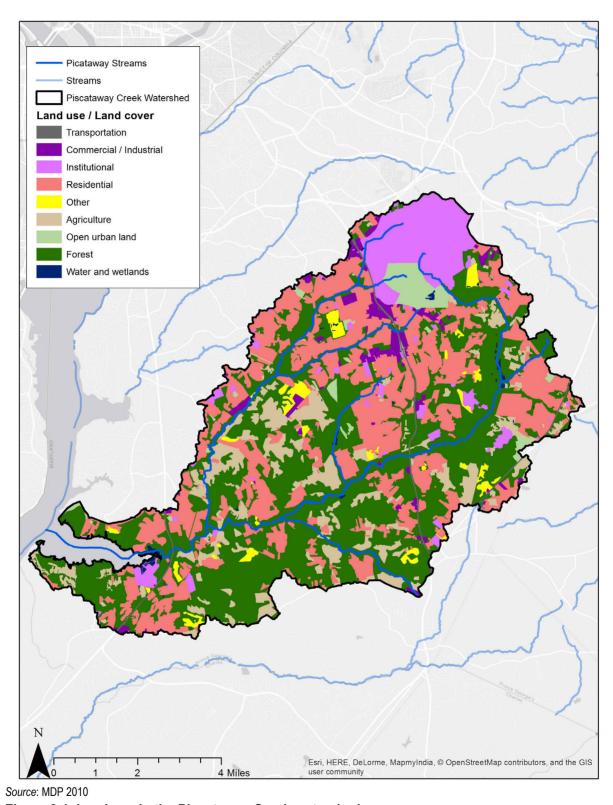


Figure 2-1. Land use in the Piscataway Creek watershed.

Table 2-2. Piscataway Creek watershed 2010 MDP land use in Prince George's County

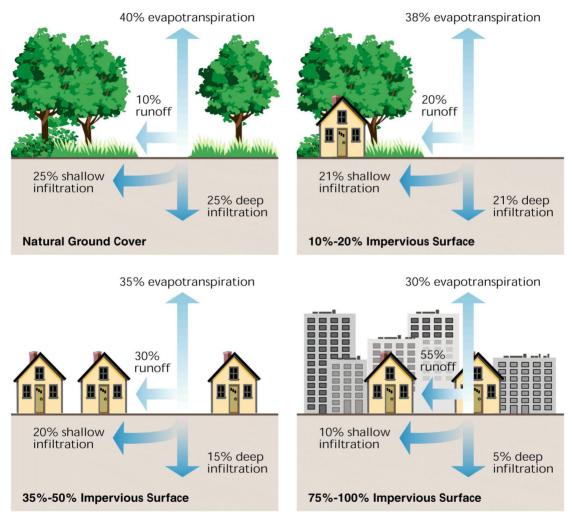
Land Use	Acres	Percent of Total	Percent of Land Use Grouping
Agriculture	4,356.6	10.05%	100.0%
Agricultural building	58.3	0.13%	1.3%
Cropland	3,065.5	7.08%	70.4%
Feeding operations		0.00%	0.0%
Large lot subdivision (agriculture)	95.8	0.22%	2.2%
Orchards/vineyards/horticulture		0.00%	0.0%
Pasture	1,118.6	2.58%	25.7%
Row and garden crops	18.3	0.04%	0.4%
Forest	18,477.2	42.64%	100.0%
Brush	439.6	1.01%	2.4%
Deciduous forest	12,854.9	29.67%	69.6%
Evergreen forest	536.9	1.24%	2.9%
Large lot subdivision (forest)	1,070.3	2.47%	5.8%
Mixed forest	3,575.4	8.25%	19.4%
Other	882.6	2.04%	100.0%
Bare ground	728.9	1.68%	82.6%
Beaches		0.00%	0.0%
Extractive	153.7	0.35%	17.4%
Urban	19,341.1	44.64%	100.0%
Commercial	847.2	1.96%	4.4%
High-density residential	335.9	0.78%	1.7%
Industrial	193.9	0.45%	1.0%
Institutional	3,607.0	8.32%	18.6%
Low-density residential	4,850.0	11.19%	25.1%
Medium-density residential	8,165.1	18.84%	42.2%
Open urban land	1,016.2	2.35%	5.3%
Transportation	325.8	0.75%	1.7%
Water and wetlands	271.1	0.63%	100.0%
Water	167.1	0.39%	61.7%
Wetlands	103.9	0.24%	38.3%

Source: MDP 2010.

# 2.4.2 Percent Imperviousness

According to Prince George's County Code, *impervious area* means an area that is covered with solid material or is compacted to the point at which water cannot infiltrate into underlying soils (e.g., parking lots, roads, houses, patios, swimming pools, compacted gravel areas, and so forth) and where natural hydrologic patterns are altered. Impervious areas are important in urban hydrology because the increased paved areas (e.g., parking lots, rooftops, and roads) decrease the

amount of water infiltrating the soils to become ground water as shown in an example of how increased impervious area affects the water cycle (Figure 2-2). Precipitation flows off the impervious area and is shunted quickly to the stream channels in the watershed instead of infiltrating into the ground or reentering the atmosphere through evapotranspiration. During rain events, the increased runoff flow volume not only carries additional nutrients and other pollutants, but it also increases the overall velocity of the runoff and receiving streams. Faster stream flows can erode streambanks, which contributes sediment to the water column and makes the water muddy.



Source: Learn NC (http://www.learnnc.org/lp/media/uploads/2010/02/fig3-21.jpg)

Figure 2-2. Example effects on water cycle from increased impervious surfaces.

Impervious areas include several types, including buildings (e.g., roofs), parking lots, driveways, and roads. Each type has different characteristics and contributes to increased runoff and pollutant loadings in different ways. For instance, driveways have a higher nutrient loading potential to waterways than roofs, because this runoff could include grass clippings and fertilizer that was accidentally spread on the driveway. Sidewalks will have a higher bacteria loading than driveways because people walk their dogs along sidewalks and sometimes do not pick up the dogs' waste.

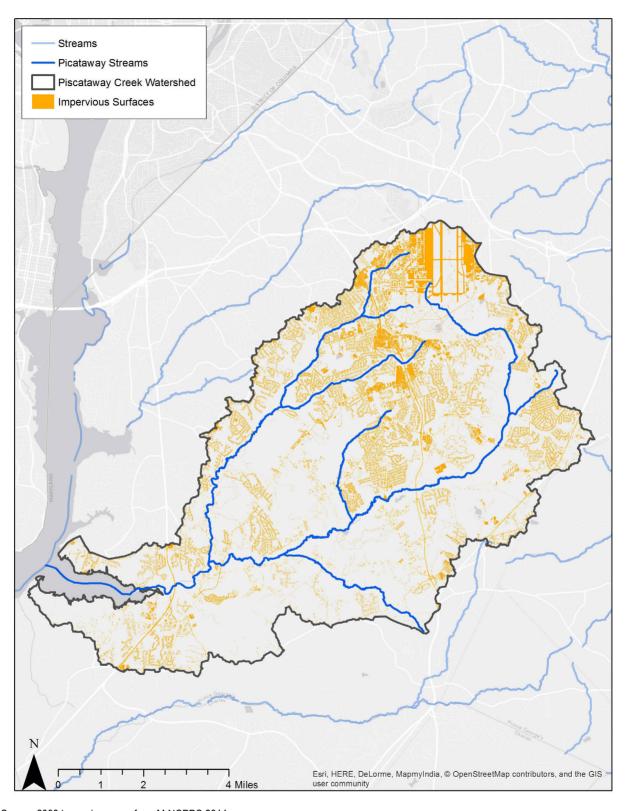
Impervious areas are further classified into two subgroups: connected and disconnected. On connected impervious land, rainwater runoff flows directly from the impervious surface to stormwater sewers, which in turn flow directly to streams. In disconnected impervious cover areas, rainwater runoff flows over grass, meadows, or forest areas before being intercepted by stormwater sewers, which then flow to streams. Directly connected impervious cover is substantially more detrimental to stream health and quality than disconnected land cover because the highly efficient conveyance system (stormwater pipes) associated with directly connected impervious cover increases the volume and rate of flow and pollutant transport to nearby streams.

Table 2-3 presents the 2009 impervious area information for the watershed. These totals include impervious area on state and federal land, as well as outside the MS4 area. The majority of the impervious area in the watershed is composed of buildings (25 percent of impervious area), roads (28 percent of the impervious area), and parking lots (13 percent of the impervious area). Impervious areas are most concentrated in the Tinkers Creek and JBA portions of the watershed, which correspond to most of the urban areas. Figure 2-3 shows the extent of impervious area throughout the watershed.

Table 2-3. Piscataway Creek watershed total impervious area in Prince George's County

Impervious Type	Area (acres)	Percent of Impervious Area	Percent of Total Watershed Area
Aviation	494.7	8.5%	1.1%
Drives	613.0	10.5%	1.4%
Gravel	288.0	5.0%	0.7%
Other	297.1	5.1%	0.7%
Parking	775.2	13.3%	1.8%
Railroad	0.0	0.0%	0.0%
Roads	1,620.1	27.9%	3.7%
Roofs	1,467.2	25.2%	3.4%
Walkways	256.7	4.4%	0.6%
Total	5,812.0	100.0%	13.4%

Source: 2009 impervious area from M-NCPPC 2014.



Source: 2009 impervious area from M-NCPPC 2014.

Figure 2-3. Impervious areas in the Piscataway Creek watershed.

# 2.5 Water Quality and Stream Biology

Water quality data are available from several different sources. Data used for restoration planning were obtained from the *Water Quality Portal* (www.waterqualitydata.us). This source is sponsored by EPA, the U.S. Geological Survey (USGS), and the National Water Quality Monitoring Council, and collects data from more than 400 federal, state, local, and tribal agencies. EPA's STORET (STOrage and RETrieval) Data Warehouse was also searched for additional information. MDE was contacted and provided supplemental recent data that were not found in the *Water Quality Portal* or STORET. Another important data source was the County's MS4 long-term monitoring program. Water quality data were obtained for the following parameters: fecal bacteria, BOD, DO, nutrients, and TSS. Data summaries and plots can be found in the WECR.

In addition to collecting chemical water quality data, the County also has implemented a biological monitoring program to provide credible data and valid, defensible results to address questions related to the status and trends of stream and watershed ecological condition. Biological monitoring data are used to identify problems; document the relationships among stressor sources, stressors, and response indicators; and evaluate environmental management activities, including restoration. Since 1999 two rounds of a countywide bioassessment study have been completed, the first in 1999–2003 and the second in 2010–2013. Results of the Benthic Index of Biotic Integrity (B-IBI) sampling in the Piscataway Creek watershed showed that approximately 60 percent of sites are rated as biologically degraded, having B-IBI ratings of Poor to Very Poor. Eight sites (10 percent) in the Piscataway Creek were rated Good. Degraded stream miles account for 67 percent of total stream miles in Tinkers Creek, but only 15 percent of the total stream miles in the Main Stem of Piscataway Creek. Being already degraded, the percent of degraded stream miles in Tinkers Creek increased 5 percent from the Round 1 assessments to Round 2 assessments. Being initially relatively undegraded, the percent of degraded stream miles in the Main Stem increased 22.5 percent from the Round 1 assessments to Round 2 assessments. The Round 2 assessment report suggests that, while the County's overall efforts to manage and restore water quality have not resulted in improvements in the Tinkers Creek watershed, they might have resulted in enabling streams and watersheds to "hold their own" in the face of added development and continued degradational pressures (Millard et al. 2013). This is not the case for the Main Stem, which is continuing to degrade.

### 2.6 Pollutant Sources

Sources of pollutants in the watershed are varied and include point sources as well as nonpoint sources. Point sources are permitted through the National Pollutant Discharge Elimination System (NPDES) program. Nonpoint sources are diffuse sources that typically cannot be identified as entering a water body through a discrete conveyance at one location. Nonpoint sources can originate from land activities that contribute bacteria to surface water as a result of rainfall runoff. In the Piscataway Creek watershed, all sources of pollutant loading not regulated by NPDES permits are considered nonpoint sources. The majority of permitted sources in the watershed are part of the MS4. For further details regarding pollutant sources in the Piscataway Creek watershed can be reviewed in the WECR.

### 2.6.1 NPDES-Permitted Facilities

Under the NPDES stormwater program, operators of large, medium, and regulated small MS4s must obtain authorization to discharge pollutants. The Stormwater Phase I Rule (55 FR 47990, November 16, 1990) requires all operators of medium and large MS4s to obtain an NPDES permit and develop a stormwater management program. Medium and large MS4s are defined by the size of the population within the MS4 area, not including the population served by combined sewer systems. A medium MS4 has a population between 100,000 and 249,999; a large MS4 has a population of 250,000 or more. Phase II of the rule extends coverage of the NPDES Storm Water Program to certain small MS4s. Small MS4s are defined as any MS4 that is not a medium or large MS4 covered by Phase I of the NPDES Storm Water Program. Only a select subset of small MS4s, referred to as regulated small MS4s, require an NPDES stormwater permit. Regulated small MS4s are defined as (1) all small MS4s in urbanized areas as defined by the U.S. Census Bureau, and (2) small MS4s outside an urbanized area that are designated by NPDES-permitting authorities.

In addition to Phase II municipalities, there currently are 10 County facilities and 9 other municipal facilities covered by the NPDES General Industrial permit, which requires a stormwater pollution prevention plan (SWPPP). The County currently conducts field verification of these facilities to ensure that each SWPPP accurately reflects the environmental and industrial operations of the facility. If deficiencies are noted in the SWPPP, the County provides the required technical support to upgrade the Plan. The County also monitors all SWPPP implementation activities through its database tracking system and provides MDE with an annual report documenting the status of each County-owned facility SWPPP.

In addition to municipalities, certain federal, state, and other entities are required to obtain Phase II MS4 permits. The County is not responsible for these areas. Table 2-4 presents these permitted entities within the Piscataway Creek watershed. For this restoration plan development, the County considers municipal school properties and property operated by the Maryland-National Capital Park and Planning Commission (M-NCPPC) as covered under the County's MS4 permit; however, M-NCPPC will be covered under a future MS4 permit issued specifically to M-NCPPC. The County has included those properties in its impervious areas for this restoration plan, given the current cooperation between the parties. In the past, the County has partnered with both MDE and M-NCPPC to install BMPs at public schools and M-NCPPC properties to treat impervious areas.

Table 2-4. Phase II MS4 permitted federal, state, and other entities in Piscataway Creek watershed

Agency	Installation/Facility
U.S. Air Force	Joint Base Andrews
U.S. Department of Homeland Security.	Law Enforcement Training Center
Washington Suburban Sanitary Commission	Multiple properties
Maryland State Highway Administration	Multiple (outside Phase I jurisdictions)
Maryland Transportation Authority	Multiple properties
Maryland Department of Transportation Motor Vehicle Administration	Multiple properties

Information on other permitted facilities was available from MDE's website and EPA's Integrated Compliance Information System. Appendix C of the WECR report provides additional details on those facilities. There are 32 privately owned permitted facilities in the watershed. Of these, 10 are listed as discharging stormwater. Other facilities are permitted for discharging from construction sites, mining facilities, de-watering activities, refuse sites, and swimming pools. The County is not responsible for these facilities meeting their WLAs.

Wastewater facilities might include those publicly owned treatment works providing wastewater treatment and disinfection for sanitary sewer systems, or industrial facilities providing treatment of process waters. In the Piscataway Creek watershed, one federal and one State facility are permitted to discharge treated sanitary wastewater into the watershed.

County data from 2011 indicate that there are 476 on-site wastewater systems are within the watershed. These types of systems can contribute nitrogen loadings to nearby water bodies through their normal operation. Failing on-site systems can increase nitrogen, phosphorus, and bacteria levels. No information is currently available as to the age, maintenance, or level of treatment of the systems.

Sanitary sewers occasionally unintentionally discharge raw sewage to surface waters in events called sanitary sewer overflows. These events contribute nutrients, bacteria, and solids into local waterways. Sanitary sewer overflows can be caused by sewer blockages, pipe breaks, defects, and power failures. Overflows often occur during and after major storm events and are symptomatic of infiltration and inflow of groundwater into sanitary sewer pipes through cracks and breaks. The same cracks allow sewage to percolate into the ground, some of which can seep directly into the streams or into adjacent stormwater collection pipes. The Maryland Reported Sewer Overflow Database contains the bypasses, combined sewer overflows, and sanitary sewer overflows reported to MDE from January 2005 through the most recent update. Since 2005, an estimated 347,842 gallons of sanitary overflows have been reported in Tinkers Creek. An estimated 414,031 gallons of sanitary overflows have been reported in the Main Stem of Piscataway Creek. For that period, the average amount of annual overflow has been 51,753 gallons in the Main Stem, and

43,435 gallons in Tinkers Creek. The minimum SSO was 1 gallon and the maximum was 100,000 gallons, which occurred during Superstorm Sandy.

### 2.6.2 Nonpoint Sources

Nonpoint sources can originate from rainfall runoff (in non-urban areas) and landscape-dependent characteristics and processes that contribute sediment, organic matter, and nutrient loads to surface waters. Nonpoint sources include diffuse sources that cannot be identified as entering the water body at a specific location. Because the County is considered a Phase I MS4, for TMDL purposes, all urban areas within the County are considered to be point sources and allocated loads are considered under the WLA component. Mechanisms under which urban or MS4 loads are generated are the same as other rainfall-driven nonpoint sources. Potential sources vary greatly and include agriculture-related activities, atmospheric deposition, on-site treatment systems, streambank erosion, wildlife, and unknown sources.

Atmospheric deposition occurs by two main methods: wet and dry. Wet deposition occurs when rain, fog, and snow wash gases and particles out of the atmosphere. Dry deposition occurs as gases and particles in the atmosphere settle out onto surfaces over time. Pollutants deposited through dry deposition can be washed into streams from trees, roofs, and other surfaces by precipitation. Winds blow the particles and gases contributing to atmospheric deposition over great distances, including geographical (e.g., watersheds) and political boundaries (e.g., state boundaries).

Riparian stream corridors are vulnerable to nutrient inputs from wildlife. Wild animals with direct access to streams include deer, raccoons, other small mammals, and avian species. This access to streams contributes bacteria and nitrogen to water bodies.

Development in the watershed has altered the landscape from presettlement conditions, which included grassland and forest, to post-settlement conditions, which include cropland, pasture, or urban/suburban areas. This conversion has led to increased runoff and flow into streams versus presettlement conditions, as well as streambank erosion and straightening of meandering streams. The increased erosion not only increases sediment loading to water bodies but also increases loadings of nutrients that are adsorbed to sediment particles.

# 3 RESTORATION PLAN GOALS AND OBJECTIVES

Goals in restoration planning are general statements about the desired condition or outcome of the effort. A successful restoration planning effort also identifies definite objectives, or steps that will be taken to achieve the desired goals. Objectives provide the foundation for watershed restoration and management decisions. This section identifies the specific restoration goals and objectives for the Piscataway Creek watershed, describes modeling performed to assist in quantifying certain objectives, and identifies reductions necessary for compliance with regulatory requirements (i.e., TMDLs).

# 3.1 Watershed Goals and Objectives

The watershed goals and objectives identified here reflect the specific needs of Piscataway Creek and might include priorities in addition to regulatory compliance. A goal is represented by a general statement about the desired condition or outcome of the watershed management or restoration strategies. Objectives are specific statements that define what must be true or what actions must be taken for the goals to be achieved. The objectives provide the foundation for watershed restoration and management decisions.

The watershed goals include, but are not limited to, the restoration planning goals outlined in section 1.1, which apply to all watersheds in the County. The overarching goals for Piscataway Creek are noted below:

- Protect, restore, and enhance habitat in the watershed.
- Restore watershed functions, including hydrology, water quality, and habitat, using a balanced approach that minimizes negative impacts.
- Support compliance with regional, state, and federal regulatory requirements.
- Increase awareness and stewardship within the watershed, including encouraging policymakers to develop policies that support a healthy watershed.
- Protect human health, safety, and property.
- Improve quality of life and recreational opportunities.

The watershed objectives describe more specific outcomes that would achieve the overarching goals. The objectives for Piscataway Creek are to:

- Protect land that supports rare and/or threatened high quality terrestrial, wetland, and aquatic habitat.
- Restore hydrology, water quality, and habitat functions in wetlands and streams.
- Implement BMPs and programmatic strategies that restore hydrologic and water quality functions and protect downstream aquatic habitat and designated uses.
- Achieve pollutant load reductions to comply with regulatory requirements as shown in Table 1-1.
- Educate watershed stakeholders and create opportunities for active public involvement in watershed restoration.

■ Integrate watershed protection and restoration in policy-making processes at the local level

The objectives are used to guide the identification and prioritization of management options. For some management options, like structural BMPs, achievement of the hydrology and water quality objectives can be quantified to evaluate effectiveness towards meeting the goals and objectives. For other management options, like programmatic strategies and education, achievement of objectives can be evaluated with a more qualitative approach. The goals and objectives are used to communicate priorities and ensure tangible progress across all stages of restoration planning and implementation.

# 3.2 Watershed Treatment Model (WTM) Modeling

MDE's *TMDL Data Center* website (MDE 2014c) provides technical guidance for developing restoration plans for WLAs (MDE 2014b). Part of this guidance allows entities to calculate updated load estimates using specific land-use and other data for restoration planning. The guidance allows entities to use their own data to develop loads if they retain the percent reduction specified in the respective TMDL between baseline loads and the allocations for the applicable pollutants (MDE 2014b). Baseline conditions, as defined by MDE, represent the impaired conditions that the watershed was under during TMDL development. The percent reduction of pollutants is based on loads needed to achieve the applicable water quality standards in specific water bodies.

Using MDE's guidance, the County used a County-modified Watershed Treatment Model (WTM) to calculate new loads for the implementation model baseline. The purpose of the implementation model was not to recalculate the WLA as defined in the TMDL documents and the MDE *TMDL Data Center*, but to convert the TMDL load reduction from the original TMDL model to an implementation model (WTM) that can be effectively used in the planning of restoration activities. The level of effort (load reduction percentage) to meet water quality standards is kept the same between the two models. WTM was modified to include more specific land-use types as well as to differentiate between connected and disconnected impervious areas to calculate more precisely loads generated from different land-use types. Therefore, the modified WTM provides the County the ability to specifically identify the land uses and land covers that produce the larger loads and target BMPs and other restoration measure to those land uses. This approach will allow the County to make better decisions on where a specific type of restoration activity should be implemented and to improve implementation planning.

Because the TMDLs in the County have been established in different years, the County opted to use one set of common data to establish *implementation model* baseline loads for all pollutants addressed in this restoration plan. Therefore, *baseline loads* in this plan refers to the pollutant loads calculated using the modified WTM (implementation model) with the most recent land use (MDP 2010) and impervious cover (M-NCPPC 2009) data available. This method provides a more accurate depiction of loadings from County land and establishes a common set of baseline data, which aids in the restoration planning process. The WTM baseline loads have been compared to both Maryland Assessment and Scenario Tool (MAST)<sup>1</sup> and TMDL baseline loads and are

<sup>&</sup>lt;sup>1</sup> http://www.mastonline.org/ (Accessed September 2, 2014).

discussed in a technical memorandum provided to the County (Tetra Tech 2015b). Load reductions from BMPs that have been implemented since the TMDLs were issued are only accounted for after these baseline loads have been established. Section 4.3.2 describes the process of assigning load reduction credits for currently installed BMPs.

Building on previous work in the Piscataway Creek watershed, the County's contractor developed a methodology to provide a realistic breakdown of land cover-specific loads to facilitate the restoration planning process. It is important to understand the substantial differences between land use and land cover. Land use refers to how land is being used, such as for commercial or agricultural purposes. Land cover refers to what covers the ground, such as parking lots, buildings, or agricultural fields. Land use analysis lumps many different types of land covers into a single use category. It can be an effective measure for estimating watershed runoff responses only where the differences in land covers between land uses (e.g., commercial versus residential) are much greater than the differences in land covers within a particular land use category. For instance, industrial land covers can be quite different and range from roof-dominated warehouses to junkyards. This is often the case, particularly with institutional or industrial uses that can include a variety of different land covers. In contrast, land cover analysis can be very useful for predicting watershed runoff responses, in particular those associated with impervious areas, because impervious cover—particularly connected impervious cover—increases both flow and pollutant transport. Therefore, a vital aspect of this analysis was to develop an accurate estimate of land cover. including accurate estimates of impervious and pervious source areas. For this reason, WTM analyses that include land cover will be beneficial during BMP implementation because the ability to target specific BMPs to appropriate land covers can maximize load reductions and reduce costs. In contrast, using land use is a coarser approach. A brief discussion of the WTM process is presented below; a more detailed description was provided to the County in a technical memorandum (Tetra Tech 2015b).

In the loading analysis, the County's GIS information and WTM routines were applied together to estimate subwatershed loads at the edge of the stream. The WTM is a spreadsheet-based tool that evaluates loads from a range of sources and estimates reductions from a suite of treatment options. GIS data were used to identify different impervious and pervious source areas and to identify impervious areas as connected or disconnected (Caraco 2013).

The watershed baseline loads were calculated using a modified version of WTM (based on Ver. 2013 obtained from the Center for Watershed Protection) on a countywide scale to maintain consistency across the County. The watershed scale was used because of the number of watersheds that have current TMDLs. The model was adapted to allow for adjusting the effects of hydrology and land cover to refine runoff loading rates. Applying the WTM model in this way produces a greater degree of accuracy in subwatershed loads than would be possible with a simple approach using land use. This precision not only highlights most impaired subwatersheds with greater accuracy but also allows for detailed BMP-specific loads to be calculated in support of the restoration planning process.

This approach followed the methodology from the County's Piscataway Watershed Report (PGC DER 2012a), which used a calibrated EPA SWMM to determine runoff sources and flows and the WTM model to partition runoff into directly connected impervious areas, disconnected impervious areas, and pervious receiving areas, with separate allocations for rural and natural areas. The

Piscataway SWMM results were also used to calibrate flows in the Piscataway Creek WTM model. The results in the Piscataway Creek model were used to adjust the appropriate parameters in the WTM model to more accurately evaluate the effects of hydrologic partitioning and of different land covers. Coefficients in the Piscataway Creek WTM model were adjusted so that the WTM-computed runoff matched the SWMM runoff values from the Piscataway SWMM model. These coefficients were then applied in the countywide WTM model.

Loading rates and concentrations from different land covers in the countywide WTM model were derived from the literature and were then applied to obtain mass loads in each subwatershed. Initial concentrations were based on the National Stormwater Quality Database (Maestre and Pitt 2005) and data gathered by Tetra Tech (2014b) for the Chesapeake Bay Program (CBP). The WTM loads were calibrated to match the baseline loadings in MAST, which is a planning tool developed for MDE and the CBP to support implementation of the Chesapeake Bay TMDL for nutrients and sediment. These loadings were also compared to the baseline loads in the respective TMDLs for BOD and bacteria.

Table 3-1 presents the final calibrated average concentrations allocated to the various land cover types and surface conditions used in the countywide WTM. In a technical memorandum to the County, Tetra Tech (2015b) provided a detailed explanation of how the concentrations were determined.

Table 3-1. Calibrated average concentrations in WTM by land cover type

Primary sources				Concentration	ıs	
Category	Land cover	Total nitrogen (mg/L)	Total phosphorus (mg/L)	TSS (mg/L)	BOD (mg/L)	Fecal coliform bacteria (MPN/100 mL)
Connected	Aviation	1.90	0.15	30	5.5	200
impervious areas	Drives	2.20	0.35	70	12.5	5,000
	Gravel	1.80	0.20	110	7.5	1,000
	Other	1.80	0.20	60	7.5	5,000
	Parking	2.20	0.35	60	15.0	7,500
	Railroad	1.80	0.15	100	7.5	1,000
	Roads	2.20	0.30	60	12.5	5,000
	Roofs	1.60	0.12	15	7.5	1,500
	Walks	2.20	0.30	40	12.5	7,500
Disconnected	Aviation	3.80	0.30	60	5.5	1,000
impervious areas	Drives	4.40	0.70	140	12.5	25,000
	Gravel	3.60	0.40	220	7.5	5,000
	Other	3.60	0.40	120	7.5	25,000
	Parking	4.40	0.70	120	15.0	37,500
	Railroad	3.60	0.30	200	7.5	5,000
	Roads	4.40	0.60	120	12.5	25,000
	Roofs	3.20	0.24	30	7.5	7,500
	Walks	4.40	0.60	80	12.5	37,500
Pervious areas	Turf	1.75	0.35	50	2.5	5,000

Primary sources  Category  Land cover		Concentrations					
		Total nitrogen (mg/L)	Total phosphorus (mg/L)	TSS (mg/L)	BOD (mg/L)	Fecal coliform bacteria (MPN/100 mL)	
	Field	1.50	0.15	25	1.5	5,000	
	Crops	10.00	0.50	250	12.0	15,000	
	Woods	1.25	0.05	15	0.8	500	
	Wetlands	1.00	0.05	15	0.8	2,500	
	Open Water	1.50	0.05	15	0.8	200	
	Barren	2.00	0.90	400	3.0	1,000	

As part of the calibration process, a reduction factor was needed for bacteria. Bacteria concentrations attenuate during flow from the land cover to the water bodies, where the observed water quality data for the TMDL were taken. As a result, the edge-of-land-cover loads are more than an order of magnitude higher than the observed loadings in County water bodies, requiring that an overall reduction factor be applied to convert edge-of-land-cover bacteria loads to in-stream bacteria loads. This conversion process includes the transformations needed to account for the difference in the fecal coliform bacteria in-stream loads in the TMDL (*E. coli* or enterococci) and the fecal coliform bacteria runoff loads in WTM. The reduction factor was calculated by dividing the estimated in-stream loads by the edge-of-land-cover loads from WTM. A full description of this process is available in a technical memorandum provided to the County (Tetra Tech 2015b).

The WTM modeling method allows for a more precise determination of the loads at a subwatershed level and can be used to identify the loads originating from the different municipal, state, and federal entities. The analyses were conducted at different spatial levels. The first evaluated the subwatershed in its entirety, establishing all subwatershed loads from runoff, or the baseline loads within the County boundary. The next level of analysis focused on the urban MS4 area, which comprises the source areas regulated by the County's MS4 permit. It excludes rural and natural areas. The last level of analysis partitioned the MS4 areas into their respective county, municipal, state, and federal ownerships. In this manner, it was possible to highlight the sources of the pollutant loads, as well the loads coming from each type of ownership. This approach allows a fair allocation of the obligations needed to meet the TMDL WLAs. The calibrated WTM land-cover-specific loading model was also applied at the smaller site-level scale for a BMP drainage area, ensuring consistency in meeting the TMDL WLAs and estimating reductions that would be achieved with the planned BMPs.

# 3.3 Implementation Model Load Reductions

Table 3-2 presents the WTM baseline loads using recent land use and impervious data from the portions of the Piscataway Creek watershed that are in the County's MS4 area. The loadings in Table 3-2 do not exactly match the local Piscataway Creek watershed TMDL since WTM was calibrated to best fit to MAST and the county TMDLs. As discussed in the previous section, the loadings in this restoration plan were determined using WTM, which follows MDE guidance (MDE 2014b) allowing counties to use local data to determine urban loads for implementation

purposes. This method also accounts for the loads from a more accurate and more recent urban footprint than the TMDL, so the baseline loads in this plan will not exactly match those in the TMDL documents

Table 3-2 also presents the percent reduction from MDE's *TMDL Data Center*. This percent reduction was applied to the WTM-calculated baseline load to determine the implementation load reduction target. That target and the amount by which the loads need to be reduced (using WTM) are also presented in Table 3-2. These loads represent the urban area that is regulated by the County's MS4 permit. They represent the loads without currently implemented BMPs and programmatic efforts, and thus represent the baseline loads in the implementation model for the watershed. The loads reduced by current BMPs and other practices are discussed in the next section.

Table 3-2. WTM MS4 baseline and implementation loads for the Piscataway Creek watershed in Prince George's County

Watershed	Unit	Implementation Model Baseline from WTM	Percent Reduction from MDE TMDL  Data Center	Implementati on Model Target Load	Required Implementation Model Reduction from WTM
Tinkers Creek	MPN B/yr	622,561	42.60%	357,350	265,211
Main Stem of Piscataway Creek	MPN B/yr	900,086	42.60%	516,649	383,437
Total	MPN B/yr	1,522,647	42.60%	873,999	648,648

# 4 CURRENT MANAGEMENT ACTIVITIES

When rain falls, the resulting runoff flows off roofs, lawns, driveways, and roads into a network of stormwater sewers that discharge directly to the streams. This stormwater flow picks up nutrients, bacteria, and sediments from roofs and lawns, along with bacteria, sediments, oils, greases, and metals from driveways and roadways, and transports them into the waterways of the County in areas where there is no stormwater treatment. Many areas of the County (including much of the Piscataway Creek watershed) were developed before the adoption of stormwater regulations and practices in the 1970s and 1980s. In these older developments, no stormwater management facilities exist. The County enacted a stormwater management ordinance in 1971 and the State adopted a statewide stormwater law and regulations in 1983. Newer development in the County, including redevelopment built since 1971, is required to provide water quality treatment for this urban runoff using a wide range of stormwater practices. During the initial years of stormwater regulation, these practices were somewhat crude and simple—such as dry ponds—but have continuously improved. Today, environmental site design (ESD)—the approach to stormwater management required by MDE—is based on the use of landscape-based practices such as rain gardens and bioswales, and is considered an ecologically sustainable approach to stormwater management. The County is currently installing these types of BMPs. This section details the BMPs that are installed in the County as well as current programmatic activities.

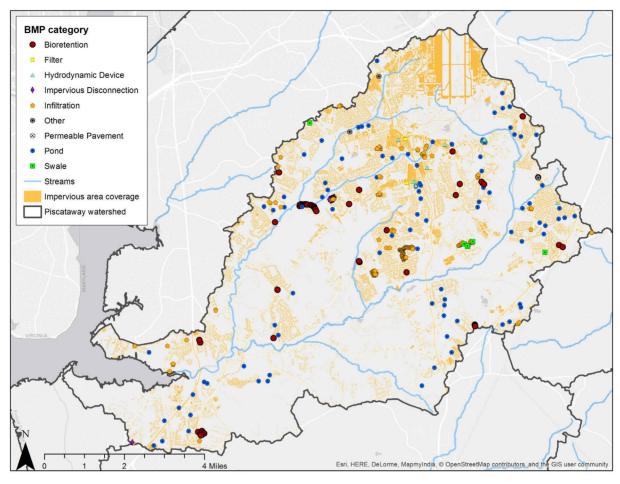
# 4.1 Existing BMPs

Table 4-1 presents the list of documented existing County structural BMPs in the County's portion of the Piscataway Creek watershed as of October 2015. Figure 4-1 presents the locations of the BMPs in the watershed. Infiltration practices including dry wells are the most-implemented BMPs, with 77 BMPs. Stormwater ponds are the second most-implemented BMP, but with far more treated area. Bioretention systems are the third-most-implemented practices. They tend to treat smaller areas, but with greater pollutant removal efficiency. As can be seen in Table 4-1, some BMPs do not have associated drainage areas and 1 BMP for which the specific type is not known. The County is actively updating their BMP geodatabase with new information.

Table 4-1. List of BMP types in the Piscataway Creek watershed

BMP Type	Total Number	Total w/ Known DA	Total Known Acres Treated	Avg. Acres Treated
Bioretention	50	48	67.44	1.40
Filter	3	2	4.09	2.05
Hydrodynamic device	40	39	16.46	0.42
Impervious Disconnection	25	24	0.34	0.01
Infiltration	232	222	62.59	0.28
Other	3	2	10.90	5.45
Pond	95	89	3,273.87	36.79
Swale	6	5	9.43	1.89
Total	454	431	3,445.12	48.29

Source: DoE, October 2015. *Note*: DA=drainage area.



Source: BMPs (October 2015) and impervious cover (June 2014) are from DoE

Figure 4-1. BMPs in the Piscataway Creek watershed.

# 4.2 Programmatic Practices

Besides installing BMPs, the County has initiated a wide range of programmatic stormwater management initiatives over the years to address existing water quality concerns. These initiatives are grouped into the following categories: stormwater-specific programs and public education programs. Each grouping (and its respective individual initiatives) is further described in this section, including the contributions that these programs make to water quality protection and improvement.

Many of the County's stormwater-related programmatic initiatives target more than one topic area. For example, in addition to promoting adoption of on-the-ground BMPs, the Alternative Compliance Program promotes stormwater education via environmentally focused sermons at places of worship. Listed below are programs administered by various departments within the County government or its partners that either directly or indirectly support water quality improvements.

- Stormwater-Specific Programs
  - Stormwater Management Program

- Clean Water Partnership (CWP)
- Rain Check Rebate and Grant Program
- Alternative Compliance Program
- Countywide Green/Complete Streets Program
- Street Sweeping
- Storm Drain Maintenance: Inlet, Storm Drain, and Channel Cleaning
- Storm Drain Stenciling
- Illicit Connection and Enforcement Program
- Cross-Connections Elimination
- Public Education Programs
  - Master Gardeners
  - Flood Awareness Month
  - Transforming Neighborhoods Initiative
  - Animal Management Programs

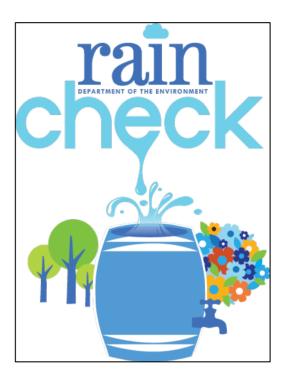
# 4.2.1 Stormwater-Specific Programs

As required under NPDES regulations, the County must operate an overall stormwater program that addresses six minimum control measures—public education and outreach, public participation/involvement, illicit discharge detection and elimination, construction site runoff control, post-construction runoff control, and pollution prevention/good housekeeping. To meet that requirement, the County administers various programs and initiatives, many of which have goals that will help achieve pollution reductions in response to TMDL requirements. Stormwater-specific program initiatives are designed to reduce flow volumes and pollutant loads reaching surface waters by facilitating the implementation of practices to retain and infiltrate runoff. Stormwater-specific programs include the following:

- Stormwater Management Program (SWM Program). The SWM Program is responsible for performing detailed assessments of existing water quality. The SWM Program is also responsible for preparing design plans and overseeing the construction of regional stormwater management facilities and water quality control projects. These activities contribute to annual load reductions through improved planning and assessment and implementation of BMPs that reduce pollutant loading. The County is continuously improving its geospatial information for stormwater sewer locations, impervious cover, BMP locations and drainage areas, and other watershed information.
- Clean Water Partnership (CWP). This partnership was formally called the Public Private Partnership (P3) Program. The County recently initiated the CWP to assist in addressing the restoration requirements of the Chesapeake Bay WIP program. The CWP program is initially focusing on right-of-way (ROW) runoff management for older communities, which are inside the Capital Beltway. The program is expected to be responsible for providing water quality treatment for 2,000 acres of impervious land over the next 3 years at a total cost of approximately \$64 million (\$14 million the first year followed by \$25 million each of the following 2 years). The CWP will span 30 years. The

second phase of restoration activities will start after 2017 and will include new acreage goals for restoration.

Rain Check Rebate and Grant Program. The Rain Check Rebate and Grant Program.<sup>2</sup> administered by the DoE, allows property owners to receive rebates for installing County-approved stormwater management practices and was established in 2012 through County Bill CB-40-2012 and started in 2013. Homeowners, businesses, and nonprofit entities (including housing cooperatives and places of worship) can be reimbursed for some of the costs of installing practices covered by the program. Installing practices at the individual property level helps reduce the volume of stormwater runoff that enters the storm drain system, as well as the amount of pollutants in the runoff. In addition, property owners implementing these techniques through the program will reduce their Clean Water Act Fee if the practice is maintained for 3 years. This program has only recently



started, and thus there are no current load reductions from it. In the first year of the program, there were 40 projects identified treating 2 acres of impervious area. The expected acreage that will be treated using this program has not yet been estimated.

Alternative Compliance Program. The Alternative Compliance Program, administered by DoE, allows tax-exempt religious and nonprofit organizations to receive reductions to their Clean Water Act Fee if they adopt stormwater management practices. The organizations have three options and can use any combination to receive credits. The options are (1) provide easements so that the County can install BMPs on their property; (2) agree to take part in outreach and education to encourage others to participate in the Rain Check Rebate and Grant Program and create an environmental team for trash pickups, tree planting, recycling, planting rain gardens, etc.; and (3) agree to use good housekeeping techniques to keep clean lots and to use lawn management companies that are certified in the proper use of fertilizers. This program has only recently started, and thus there are no current load reductions from it. The acreage that will be treated using this program has not yet been estimated. The County has identified approximately 800 potential facilities that could participate in this program. As of October 2015, it had received 130 applications and was working with 30 of the applicants to identify suitable BMP opportunities. The County has been working to compile a suite of outreach materials from various sources that congregations and nonprofits can use to educate their members. In terms of targeting specific areas, Corvias Solutions—who is designing and constructing the projects under option 1 for the Clean Water Partnership—uses the

<sup>&</sup>lt;sup>2</sup> http://www.princegeorgescountymd.gov/sites/StormwaterManagement/RainCheck/Pages/default.aspx (Accessed August 29, 2014)

- following three criteria to prioritize potential target areas: 1) located in a Transforming Neighborhoods Initiative (TNI) area, 2) located in a high-priority watershed, and 3) located near other work being done by Corvias (in an effort to reduce costs). Over the next few years, the County intends to reach out to all identified facilities.
- Transportation (DPW&T) initiated a countywide Green/Complete Streets Program in 2013 as a strategy for addressing mounting MS4 and TMDL treatment requirements. The program identifies opportunities to incorporate stormwater control measures, environmental enhancements, and community amenities within the DPW&T's capital improvement projects. The types of projects that can contribute to pollutant load reductions include low impact design, tree shading, alternative pavements, and landscape covers. No projects have been completed as of the date of this document; however, some projects are in the design phase and will go into construction in fiscal year 2015. The acreage that will be treated using this program has not yet been estimated.
- DPW&T has implemented a program to identify existing untreated rural roadways that might qualify for untreated impervious baseline reduction and/or water quality emulation of ESD to the maximum extent possible through existing sheetflow conditions and hydrologic disconnectedness. GIS will be used to identify the roadways that will be credited and considered removed from the County's total untreated impervious surface area. The process entails a desktop and field verification to ensure that the roadways qualify per the document, *Accounting for Stormwater Wasteload Allocations and Impervious Acres Treated* (MDE 2014a), which allows for watershed restoration credit for existing open section rural roadways. This program does not affect restoration planning, since the program does not produce load reductions. It reduces the number of impervious acres recognized in the MS4 permit. A portion of the projects, however, focuses on identifying additional BMP opportunities. Any new BMP opportunity can be credited towards this restoration plan once it is implemented.
- Street Sweeping. The County conducts street sweeping operations on select arterial, collector, and industrials streets. Residential subdivisions are swept on a request-only basis. Street sweeping can reduce the amount or debris, including sediment that reaches waterways. The street sweeping data collected for the arterial and industrial streets is recorded in four seasonal cycles, with 3 months of data recorded for each cycle. During the 2013 reporting period, 1,872 curb miles were swept countywide, collecting 1,097 tons of debris. This includes 21 miles of roads in the Piscataway Creek watershed. Of those, 14 miles were swept in the spring and fall, while 6 miles were only swept in the fall. The program performs street sweeping 12 times per year on the same roadways, with intermittent sweeping (approximately 500 curb miles) by specific request from communities.

Street sweeping falls under MDE's identified programmatic practices for pollution reduction that can provide water quality benefits. These practices are called *alternative BMPs* and offer jurisdictions additional options and greater flexibility toward meeting restoration requirements outlined in MS4 permits.

MDE has identified two approaches for calculating the pollutant load reduction associated with street sweeping: the mass loading approach and the street lane approach (MDE 2014a, Appendix D). Because the County's frequency of street sweeping does not

comply with the credit requirements of the street lane approach, the mass loading approach is used to calculate the load reductions. For the mass loading approach, the street dirt collected is measured in tons at the landfill or ultimate point of disposal. The pollutant load removed is then based on a relationship between the pollutant load present in a ton of street dirt dry mass. This relationship is 3.5 pounds (lb) for total nitrogen, 1.4 lb total phosphorus, and 420 lb TSS per ton. Using the mass loading approach and the street sweeping data provided by the County, 2012 and 2013 estimates for countywide reductions to TSS, total nitrogen, and total phosphorus are provided in Table 4-2.

Table 4-2. Countywide pollutant reductions from street sweeping	Table 4-2. Count	wwide pollutan	t reductions fr	om street	sweeping
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Year	Debris Load (tons)	TSS Load (lb)	Total Nitrogen Load (lb)	Total Phosphorus Load (lb)
2012	1,372	576,240	4,802	1,921
2013	1,097	460,740	3,840	1,536

- Storm Drain Maintenance: Inlet, Storm Drain, and Channel Cleaning. These are systematic water quality-based storm drain programs where routine inspections and cleanouts are performed on targeted infrastructure with high sediment and trash accumulation rates. Municipal inspections of the storm drain system can be used to identify priority areas. DPW&T inspects and cleans 69 major channels on a 3-year cycle. In 2013, DPW&T performed maintenance on 23,396 linear feet of concrete channel and 15,281 linear feet of earthen channel.
- The Storm Drain Stenciling.
  The Storm Drain Stenciling
  Program continues to raise
  community awareness and
  alert community members
  of the connection between
  storm drains and the
  Chesapeake Bay. While the
  County's stormwater
  management program
  requires stenciling on all
  new developments, this



program focuses on using stencils as a means of educating the citizens in older communities (i.e., communities built before stormwater regulations went into effect). The County uses Chesapeake Bay Trust funding to purchase the paint, tools, and stencils used by the volunteers to stencil the "Don't Dump—Chesapeake Bay Drainage" message. It is difficult to estimate the load reduction from storm drain stenciling; however, it is expected to help reduce pollutant loads to local water bodies.

■ Litter Control. The County maintains an aggressive litter control and collection program along County maintained roadways. The litter service schedule is based on historical collection data; therefore, the most highly littered roadways are serviced as often as 24 times per year. In general, major collector and arterial urban roadways are serviced weekly with rural roadsides served at least once per month. In 2013 the

County received over 1,500 requests for removal of illegal dumping through the County's 311 system. Illegal dumping in the right-of-way is removed within five working days of notification. As a result of these efforts, approximately 2,398 tons of debris and solid waste was removed from County roadways during this reporting period. In addition to storm drain inlet cleaning, the DPW&T maintains automatic bar screen cleaners at four of its Anacostia Flood Control pumping stations. These devices have proven to be very effective in the removal of solid wastes from stormwater entering the stations. Based on monthly reports, 315 tons of debris was collectively removed from the Bladensburg, Brentwood, Colmar Manor, and Edmonston pumping stations in 2013.

- *Illicit Connection and Enforcement Program.* In partnership with the County's Comprehensive Community Cleanup Program, DoE conducts field screening and outfall sampling. This program is designed to revitalize, enhance, and help maintain unincorporated areas of the County, providing a wide range of clean up and maintenance services to a community over a 2-week to 1-month period. Outfall sampling serves to detect and eliminate stormwater pollutants and support clean and healthy communities. DoE's Investigation, Inspection and Enforcement Program investigates incoming complaints on the County's Water Pollution Line (95-CLEAN). Enforcement actions associated with violations involving the improper storage of materials and/or dumping on private property are the responsibility of the Department of Permitting, Inspections, and Enforcement as authorized under the Zoning Ordinance, Housing and Property Codes. Illegal dumping on public property is the responsibility of DPW&T. Environmental enforcement; including for disturbed areas, grading, sediment and erosion control, and pollution, is authorized under Subtitle 32 with the enforcement authority assigned to the DPW&T. The prevention of human exposure to sewage is administered by the Health Department in accordance with the on-site sewage disposal systems regulations. The control of hazardous chemicals or substances is governed by the Fire Safety Code. Where appropriate, the County also refers enforcement cases to MDE. It is difficult to estimate the load reduction from illicit discharge correction because their location and size are unknown until reported. Their correction is expected to help reduce loads to local water bodies.
- Cross-Connections Elimination. Another potential source of nutrients, BOD, and bacteria is the cross-connection, or a place where a dwelling's sewers are directly connected to the storm sewer instead of the sanitary sewer. These connections can be discovered by means of dye testing, smoke tracing, and chemical signatures. An aggressive program to discover and eliminate cross-connections could also substantially reduce human bacteria loads. The County has a program to detect these illicit discharges into the County's stormwater system, and thus into the County's water bodies. It is difficult to estimate the load reduction from eliminating cross-contamination because the location and size of the connections are unknown until reported. Their disconnection is expected to help reduce pollutant loads to local water bodies.

## 4.2.2 Public Education Programs

DoE seeks every opportunity to promote environmental awareness, green initiatives, and community involvement to protect natural resources and promote clean and healthy communities.

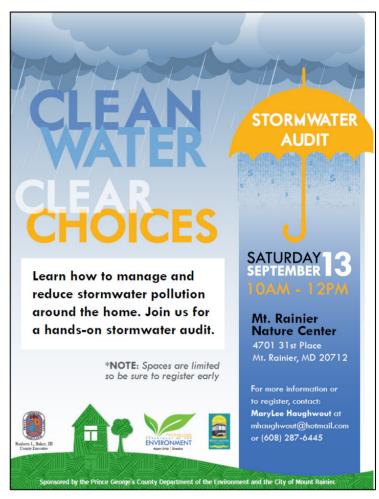
The County also integrates water quality outreach as a vital component of watershed restoration projects. To reduce stormwater pollutants, the County is required to integrate outreach and education into County services and programs.

During the 2012 reporting year, DoE hosted 37 environmental events and participated in an additional 40 events led by regional, local, and nonprofit environmental organizations. At those events, DoE staff provided handouts, answered questions, made presentations, promoted programs such as the Rain Check Rebate and Grant Program, and displayed posters and real-world examples of stormwater pollution prevention materials (e.g., sample rain barrels, samples of permeable pavement, etc.) The County also published a series of brochures to raise stormwater pollution awareness and educate the residential, business, and industrial sectors on their role in preventing stormwater pollution. These brochures provide a brief and informative overview of a single topic, providing helpful, nontechnical information on water quality topics, including measures that can be taken to prevent harm to the County's water resources. Topics include stormwater BMPs such as rain gardens, cisterns, and pavement removal.

Provided below are details about other County-administered outreach and education efforts that have the potential to reduce stormwater pollution through BMP implementation.

- Interactive Displays and Speakers for Community Meetings. In FY 15, County staff led or supported 138 outreach events (reaching approximately 7,388 people) throughout the County to provide presentations, displays (e.g., EnviroScape) and handouts, answer questions, and promote environmental stewardship. At these events, County staff provided information on the importance of trees and tree planting (including the maintenance, benefits, and funding available for tree plantings), stormwater pollution prevention, lawn care, Bayscaping, and trash prevention and cleanup. Some of the events included either a presentation or field demonstration. Of the 138 events, 18 were held in TNI areas and reached 1,336 people.
- Master Gardeners. Master Gardeners are volunteer educators who provide horticultural education services to individuals, groups, and communities. They also coordinate development of community gardens and school-based gardens. Participants receive 50 hours of basic training from University of Maryland faculty and other Master Gardeners, and then must complete 40 hours of required volunteer service during the first year. The mission of the Master Gardener Program is to educate Maryland residents about safe, effective, and sustainable horticultural practices that build healthy gardens, landscapes, and communities. The program has the potential to aid overall reduction of fertilizer and pesticide use, as well promote increases in stormwater practices such as installing rain gardens and using rain barrels. The Master Gardeners are a trusted group in most communities because of their ties with the University of Maryland Extension. Currently 64 Master Gardeners are active in the County; they logged 3,581 volunteer hours in 2013. The volunteers hosted 42 plant clinics, reaching 2,500 residents in 2013. Also in 2013 the program partnered with DoE to deliver information on the Rain Check Rebate and Grant Program.

Stormwater Audit Program. DoE recently began an effort to conduct stormwater audits on residential properties. The County is coordinating the effort with local municipalities. On September 13, 2014, the County, along with the City of Mt. Rainier, hosted a stormwater audit at the Mt. Rainier Nature Center to kick off the effort. Several other municipalities have expressed interest in participating. During the audits. County staff walk the chosen properties with homeowners and make suggestions on the types and potential locations for stormwater BMPs. Ideally the audits will become one of the components in DoE's outreach toolbox. Working with homeowners one-on-one at a site is likely to spur greater adoption of BMPs because



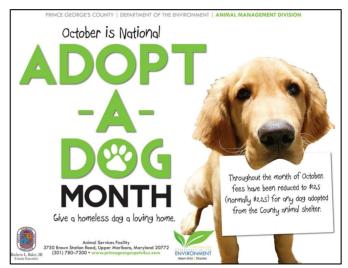
DoE staff will be available to provide technical assistance and answer the homeowner's questions immediately.

■ *Transforming Neighborhoods Initiative (TNI)*. TTNI is an effort by the County to focus on uplifting six neighborhoods that face significant economic, health, public safety, and educational challenges. Through this initiative, the County will improve the quality of

life in those neighborhoods while identifying ways to improve service delivery throughout the County for all residents. The six areas that have been identified are East Riverdale/Bladensburg; Glassmanor/Oxon Hill; Hillcrest Heights/Marlow Heights; Kentland/Palmer Park; Langley Park; and Suitland/Coral Hills. The County has been investigating how to use environmental



- restoration, stormwater management practices, and environmental education as one of the ways to help transform the neighborhoods while also creating safer, more inviting community environments.
- Flood Awareness. During June, DoE works to raise awareness of flood risks and what County residents can do to protect their homes, families, and personal belongings if flooding occurs. DoE incorporates messages that encourage residents to implement flood-prevention stormwater practices (e.g., BMPs), such as using permeable pavers and rain gardens, to help prevent costly property damage caused by backyard flooding.
- Animal Management. The County's Animal Management Division administers programs for animal control, animal licensing, vaccination, spaying and neutering, public education, cruelty prevention, euthanasia, and other programs. The division keeps detailed records on the number and types of licensed animals in the County, as well as statistics related to the stray animal population. Spaying



and neutering as well as pet adoptions can keep animals from becoming strays, which contributes to bacteria, nutrient, and BOD loadings to County water bodies. Dog license information can help determine areas on which to focus pet waste campagins.

### 4.3 Estimated Load Reductions

The main purpose of implementing BMPs is to remove pollutants near their source and prevent pollutant loads from entering and degrading water bodies. Different types of BMPs remove pollutants with differing degrees of effectiveness, often called pollutant removal efficiencies. To estimate pollutant reductions achieved through BMP implementation, it is necessary to know the removal efficiency. Stormwater treatment ponds tend to have lower pollutant load removal efficiencies (but can treat stormwater drained from larger land areas), while bioretention systems and infiltration practices tend to have higher removal efficiencies (but can only treat stormwater drained from smaller land areas). The first step in determining the estimated load reduction is to determine the load reduction efficiencies. The second step is to perform the load reduction calculation.

#### 4.3.1 BMP Pollutant Load Reduction Removal Efficiencies

MDE's Accounting for Stormwater Wasteload Allocations and Impervious Acres Treated (MDE 2014a) incorporates recent CBP recommendations for nutrient and sediment load reduction removal efficiencies associated with BMP implementation. By using these removal efficiencies in its reduction calculations, the County is consistent with regionwide efforts to meet the Chesapeake

Bay TMDL. Because the MDE guidance only provides percent removal efficiencies for total nitrogen, total phosphorus, and TSS, the removal efficiencies for BOD and bacteria needed to be identified through additional research. BOD efficiencies were obtained from Harper (1995).

Unlike a conservative metric like TSS, fecal coliform bacteria grow in the environment, and often settle in sediments, generating a source of fecal coliform bacteria that persist between stormwater flow events. Bacteria loads, therefore, can be increased by certain BMPs, particularly dry ponds, where fecal coliform bacteria growth can occur. There are relatively few studies on fecal coliform bacteria removal by BMPs. The following text discusses the rational for assigning load reduction efficiencies. This is further detailed in a technical memorandum provided to the County (Tetra Tech 2015b).

Available literature shows that overland filtering systems (e.g., filter strips, grass swales, biofiltration swales) provide some fecal coliform bacteria load reduction, but can become sources if heavily visited by animals, resulting in overall removal efficiencies of 35 percent. Wet ponds would be expected to have high removal efficiencies; however, literature indicates that reductions are less than with swales. Extended detention wet ponds have slightly improved performance. Shallow marshes are considered more effective. The few dry ponds in the County will be converted into more efficient practices (section 5.1.1).

Stormwater flow through filtering systems (primarily bioretention systems with underdrains) can provide very high fecal coliform bacteria retention, often reported as high as 99 percent. However, fecal coliform bacteria loads can still be considerable in high flows that bypass BMPs designed to treat only the first inch of runoff, as per current design guidelines. Similarly, infiltration systems capable of 100 percent elimination of treated loads are also subject to bypass during high flows. Therefore, the fecal coliform bacteria removal efficiency was estimated to be 90 percent for infiltration practices (including porous pavement) and bioretention systems. The removal efficiency from sand filters is estimated to be 80 percent, but was adjusted to 70 percent to account for bypass during high flows. No reductions are allocated to ultra-urban hydrodynamic devices (e.g., oil and grit separators) because of their minimal retention time. The removal efficiency was set to 0 percent.

The pollutant removal efficiencies of the BMP practices (based on treating 1 inch of runoff) in the restoration plan are provided in Table 4-3. Pollutant removal efficiency increases as more runoff volume is treated. Removal efficiencies for additional treatment volumes are provided in Table 4-4. Table 4-4 also illustrates that runoff reduction practices consistently reduce pollutant loads at a higher efficiency than structural practices, at all treatment volumes. Where runoff reduction or ESD practices are used, or other acceptable runoff reduction practices predominate, the ESD/runoff reduction curves should be used. Otherwise, the stormwater treatment or structural practices curves should be used.

Table 4-3. Pollutant removal efficiencies of BMPs (based on treating 1 inch of runoff)

BMP Type	ESD Practice?	Total Nitrogen	Total Phosphorus	TSS	BOD	Fecal Coliform Bacteria	
Runoff reduction practices							
Green roofs	Yes	57%	66%	70%	83%	90%	
Porous pavement	Yes	57%	66%	70%	83%	90%	
Nonstructural practices <sup>1</sup>	Yes	57%	66%	70%	NA	NA	
Rainwater harvesting	Yes	57%	66%	70%	NA	N <i>A</i>	
Submerged gravel wetlands	Yes	57%	66%	70%	63%	75%	
Landscape infiltration	Yes	57%	66%	70%	99%	90%	
Infiltration berms	Yes	57%	66%	70%	95%	90%	
Dry well	Yes	57%	66%	70%	95%	90%	
Micro-bioretention	Yes	57%	66%	70%	95%	90%	
Rain gardens	Yes	57%	66%	70%	95%	75%	
Swales, dry	Yes	57%	66%	70%	95%	35%	
Enhanced filters	Yes	57%	66%	70%	55%	90%	
Infiltration basin & trench	Yes	57%	66%	70%	55%	90%	
Bioretention filters	Yes	57%	66%	70%	95%	90%	
Stormwater treatment practices							
Retention pond (wet pond)	No	33%	52%	66%	80%	25%	
Wetlands <sup>2</sup>	No	33%	52%	66%	95%	50%	
Filtering Practices <sup>3</sup>	No	33%	52%	66%	80%	70%	
Wet Swales	No	33%	52%	66%	99%	70%	
Alternative Practices							
Landscape (impervious area reduction)	No	13%	72%	84%	NA	60%	
Planting trees or forestation on previous urban	No	66%	77%	57%	NA	50%	
Planting trees or forestation on impervious urban	No	71%	94%	93%	NA	50%	
Stream restoration	No	0.075 lb/ft/yr	0.068 lb/ft/yr	248 lb/ft/yr <sup>4</sup>	NA	65%	
Impervious to pervious	No	66%	77%	57%	NA	N/	
Regenerative step pool conveyance	No	57%	66%	70%	NA	N/	
Street sweeping – mechanical	No	4%	4%	10%	NA	N/	
Street sweeping – regen/vacuum	No	5%	6%	25%	NA	N/	
Load reductions from street debris (lb reduced per ton of debris)							
Street sweeping – mechanical <sup>5</sup>	No	3.5	1.4	420	NA	N/	
Street sweeping – regen/vacuum <sup>5</sup>	No	3.5	1.4	420	NA	N/	
Catch basin cleaning <sup>6</sup>	No	3.5	1.4	420	NA	N/	

BMP Type	ESD Practice?	Total Nitrogen	Total Phosphorus	TSS	BOD	Fecal Coliform Bacteria				
Storm drain vacuuming <sup>6</sup>	No	3.5	1.4	420	NA	NA				
Structural practices not meeting MDE Manual Performance Criteria. Cannot be used to meet restoration requirements.										
Detention structure (dry pond)	No	5%	10%	10%	40%	0%				
Extended detention structure, dry	No	20%	20%	60%	40%	0%				
Extended detention structure, wet	No	20%	45%	60%	99%	35%				
Storm filter	No	40%	60%	80%	NA	0%				
Oil/grit separator	No	5%	10%	10%	NA	0%				
Underground storage	No	5%	10%	10%	NA	0%				

Source: MDE 2014a (nitrogen, phosphorus, TSS: except practices not meeting MDE guidance, which were obtained from MAST); Harper 1995 (BOD); Tetra Tech 2015a (bacteria).

#### Notes:

- <sup>1</sup> Nonstructural practices include rooftop disconnection, disconnection of nonrooftop runoff, and sheetflow to conservation areas.
- <sup>2</sup> Wetlands include shallow wetland, extended detention shallow wetland, pond/wetland system, and pocket wetland.
- <sup>3</sup> Filtering practices include surface sand filter, underground sand filter, perimeter sand filter, organic filter, and pocket sand filter.
- <sup>4</sup> The TSS load reduction for stream restoration depends on if the restoration activity is in the Coastal Plain and if the value is at the edge-of-field or edge-of-stream. For the Coastal Plain, the edge-of-stream reduction is 15.13 lb/ft/yr. The sediment delivery ratio is 0.061, making the edge-of-field load 248 lb/ft/yr. Outside the Coastal Plain, the edge-of-stream reduction is 44.88 lb/ft/yr. The sediment delivery ratio is 0.181, making the edge-of-field load 248 lb/ft/yr.
- <sup>5</sup> These reductions are for high-density urban streets that are swept at least twice a month. These values are expected to change as the result of a recent Chesapeake Bay expert panel report, which is expected to be released in early 2016.

Table 4-4. Pollutant removal rates for ESD/runoff reduction and structural practices

Runoff Depth	Runoff Depth Total Nitrogen		Total N	litrogen	TSS		
Treated (inches)	Runoff reduction	Structural practices	Runoff reduction	Structural practices	Runoff reduction	Structural practices	
0.00	0%	0%	0%	0%	0%	0%	
0.25	32%	19%	38%	29%	40%	37%	
0.50	44%	26%	52%	41%	56%	52%	
0.75	52%	30%	60%	47%	64%	60%	
1.00 <sup>1</sup>	57%	33%	66%	52%	70%	66%	
1.25	60%	35%	70%	55%	76%	71%	
1.50	64%	37%	74%	58%	80%	74%	
1.75	66%	39%	77%	61%	83%	77%	
2.00	69%	40%	80%	63%	86%	80%	
2.25	71%	41%	82%	65%	88%	83%	
2.50	72%	42%	85%	66%	90%	85%	

Note:

<sup>&</sup>lt;sup>6</sup> These reductions are for high-density urban areas, where storm drains are routinely maintained.

<sup>&</sup>lt;sup>1</sup> Typical scenario for redevelopment projects treating 50% of existing surface area.

## 4.3.2 Load Reduction from Current BMPs and Load Reduction Gap

A systematic identification of current BMPs (as of October 2015) and their locations was conducted. Once identified, their load reduction was quantified. The information available for most BMPs included drainage area (i.e., total land area flowing to a specific BMP [e.g., a dry pond]). Load reductions for the existing BMPs were calculated with WTM using the BMP drainage area land cover, and land-cover-specific pollutant loading rate. This provided the loading attributed to the BMP drainage area. That loading was then multiplied by the BMP pollutant removal efficiency to determine the amount of load reduction attributed to that specific BMP.

The load reduction calculation only included BMPs that have been implemented since the TMDL water quality data were collected. For instance, the Piscataway Creek bacteria TMDL was developed by MDE in 2006, however, the water quality data for it were collected in 2003; therefore, any BMP or other practice implemented or established before 2003 was not included. Any BMP or practice implemented or established after 2003 was included in the load reduction calculation.

The amount of load reduction that is needed after accounting for load reductions from current practices is called the *load reduction gap*. This concept is illustrated in Figure 4-2. The load reductions from current BMPs and practices and the load reduction gap are provided in Table 4-5.

Figure 4-3 shows the graphical representation of the WTM baseline loads, implementation target load, required implementation load reduction, load reduction (from baseline loads) due to current BMPs, and the reduction gap. The implementation target load and required implementation reduction equal the baseline loading (with slight differences due to rounding), while the current BMP reductions and the reduction gap equal the required reduction.

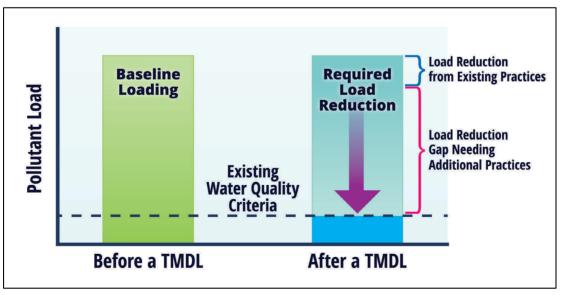
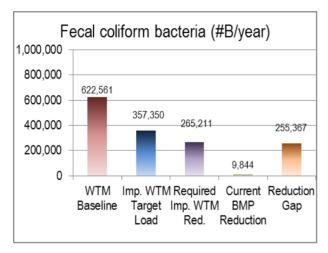


Figure 4-2. Schematic for typical pollution diet (TMDL) showing existing load reduction credits.

Table 4-5. Load reductions from current BMPs compared to required load reductions for the County's MS4 Area in Tinkers Creek and the Main Stem of Piscataway Creek

Sub- watershed	Unit	Implemen- tation Model Baseline from WTM	Percent Reduction from MDE TMDL Data Center	Implemen- tation Model Target Load	Required Implemen- tation Model Reduction from WTM	Reduction from Current BMPs	Remaining Reduction or Reduction Gap	Percent of Required Load Reduction Satisfied by Current BMPs
Tinkers Creek	MPN B/yr	622,561	42.6%	357,350	265,211	9,844	255,367	3.71%
Main Stem of Piscataway Creek	MPN B/yr	900,086	42.6%	516,649	383,437	23,006	360,430	6.00%



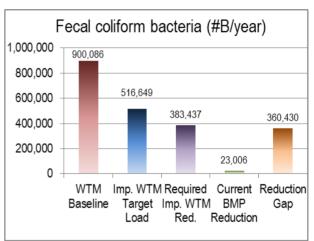


Figure 4-3. Comparisons of WTM baseline loads, implementation target load, required implementation load reduction, load reduction from current BMPs, and reduction gap for Tinkers Creek (left) and Main Stem of Piscataway Creek (right).

## 5 STRATEGY DEVELOPMENT

The watershed restoration activities in the Piscataway Creek watershed will require an unprecedented level of effort, which represents a very challenging and costly management approach. Consequently, the County has developed a strategy that includes five major components to achieve the goals of the restoration plan:

- Use WTM to evaluate the ability of existing BMPs and programmatic initiatives to meet the local TMDL WLAs and then identify and quantify future BMPs and programmatic initiatives necessary to meet the local TMDL WLAs.
- Develop cost estimates associated with the implementation of identified BMP practices and initiatives.
- Develop timelines associated with the deployment of identified BMP practices and initiatives to determine if the timelines required by the TMDL program can be achieved.
- Identify opportunities for BMP practices and programmatic initiatives and develop cost estimates.
- Identify the financial and technical resources required and develop achievable timelines for the deployment of BMP practices and programmatic initiatives that can best meet TMDL program requirements.

This section describes the overall restoration strategy for the Piscataway Creek watershed. The recommended specific planned actions, cost estimates, and a proposed schedule as well as descriptions of the financial and technical resources available to support implementation are described in section 6 of this document.

## 5.1 Systematic and Iterative Evaluation Procedure

The procedure summarized in Figure 5-1 was developed to provide for the systematic evaluation of the number and general location of BMPs and programmatic practices that will be required to achieve the targeted pollutant reduction by subwatershed. The flow chart is not a representation of the order in which the County will implement restoration practices, but is the procedure used to evaluate the amount of necessary restoration activities (e.g., programmatic goals, impervious area that will need to be treated) to meet load reduction goals. The major steps in the systematic evaluation procedure are:

- 1. Determine baseline pollutant loads from WTM (section 3.2)
- 2. Calculate reductions from existing BMPs implemented since TMDL water quality data were collected (section 4.1 and section 4.3)
- 3. Calculate reductions from existing programmatic practices (section 4.2 and section 4.3)
- 4. Determine proposed strategy management options and calculate their load reductions (section 5.1.1 and section 5.1.1)
  - a. New programmatic strategies
  - b. Existing BMP retrofits to enhance load reductions
  - c. Load reductions from public ROW projects
  - d. Load reductions from public institutional projects
  - e. Load reductions from commercial/industrial land uses

- f. Load reductions from residential properties
- 5. Perform subwatershed prioritization (section 5.2)
- 6. Finalize the restoration plan (section 6)

The first step consists of analyzing pollutant loads using the WTM and then establishing the watershed baseline pollutant load. The TMDL-established load reduction percentages are applied to the baseline pollutant loads to calculate the implementation reductions and establish the initial gap in pollutant load targets. The results of this step are discussed in section 3.3 of this restoration plan.

The second step consists of calculating the load reductions from existing BMPs implemented since TMDL water quality data were collected. The load reductions from existing programmatic strategies are then calculated in the third step. These two load reductions are combined and subtracted from the baseline loads to generate a revised load reduction gap. The results of these analyses are discussed in section 4.3.2.

The load reductions from steps 2 and 3 were not sufficient to meet the targeted reductions, and thus it was necessary to systematically progress onwards with step 4 until the targeted removal amounts are achieved. The first step in the systematic and iterative evaluation procedure to reduce the gap between required implementation reduction and estimated WTM load reduction (Figure 5-1) is to identify new or enhanced programmatic initiatives (section 5.1.1) followed by implemented BMPs to treat stormwater runoff from impervious surfaces (section 5.1.2).

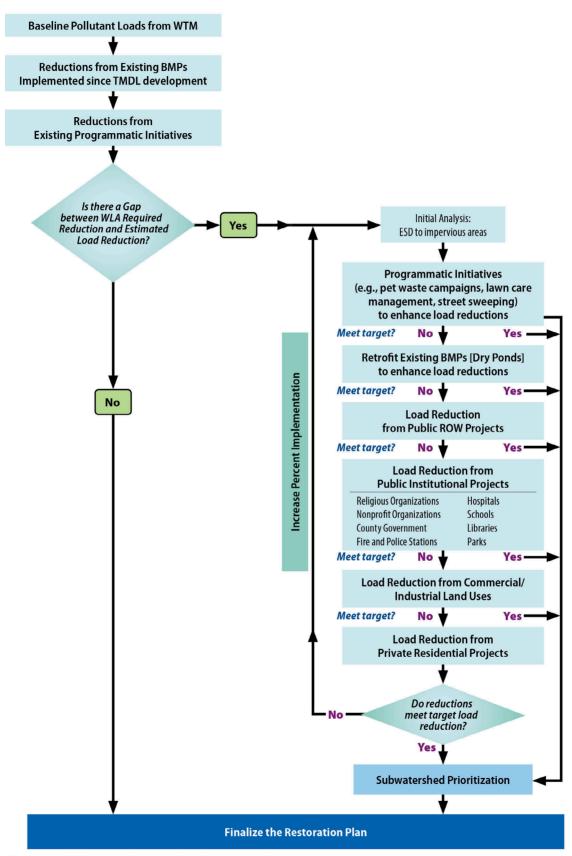


Figure 5-1. Restoration evaluation procedure.

## 5.1.1 Programmatic Initiatives

Current stormwater practices (section 4.2) were analyzed to determine, where possible, their contribution to the necessary load reductions. The existing programmatic practices are expected to continue and will be supplemented with additional practices to make up the programmatic strategies for this restoration plan. The additional strategies can be grouped into the following categories:

- Domestic and Urban Animal Source Control
- Household and Commercial Waste Disposal Measures
- Residential/Commercial Lawn Care Education

#### Domestic and Urban Animal Source Control

Population numbers play directly into determining how much pet waste is produced on a daily basis. If not disposed of properly, pet waste can contribute to significant bacteria loadings in addition to nutrient and BOD loadings to local waterways. Although pet waste is the main problem, several factors contribute to increased amounts of bacteria and will be addressed in the County's public outreach efforts. The main public outreach effort will be educating pet owners on the proper disposal of pet waste and the harmful effects pet waste can have on local water bodies. Additional public outreach will encompass ways to reduce overall animal waste. These public outreach campaigns will focus on the benefits of spaying and neutering (reducing potential for stray and abandoned animals), trap/spay/neuter events for feral cats, negative consequences of abandoning pets (e.g., public health from ticks, fleas, rabies, and uncollected waste materials), pet adoption fairs, and the health and water quality effects of providing food (intentionally or unintentionally) to nuisance wildlife (e.g., rats, pigeons) that contribute animal waste throughout the urban environment.

■ Dog Waste Program. The most effective program for reducing bacteria and nutrient loads from dogs is an aggressive waste-pickup program. Impediments to widespread adoption of this practice are both cultural and technical. A pet waste program consists primarily of education and outreach, and includes penalties for violators. It also involves installing dog waste bag dispensers in high-activity areas. Behavior change is facilitated by public education, and requires that the County provide dog waste disposal facilities and glove baggies throughout residential areas and in parks where pets congregate. It is relatively inexpensive, requiring staff to manage the program, staff to collect waste from dog waste containers, and funds for dispensers and waste containers specifically for dog waste to prevent leaks during rain events. A potential way to help fund the purchase and maintenance of the pet waste stations is to obtain corporate sponsors, where a station would be paid for by a sponsor (e.g., pet store or pet food company) and, in return, the company would have the right to advertise on the pet waste station. Additional sponsorships could be obtained for distributing free pet waste bags at community events and County public outreach events. To receive the free bags, the resident would need to pledge to always pick up after their pet and might receive coupons from the corporate sponsor. The County will investigate ways to partner with pet-related business (e.g., pet stores, veterinarians, rescue leagues) to promote pet waste campaigns. For instance, many rescue leagues require an application and a set of rules for the pet owner to follow. Part of the pet adoption process could include a pledge to always pick up pet waste and dispose of it properly and in a timely manner, as well as follow-up surveys to determine if people have followed through with their pledge.

Cat Waste Program. Unlike dogs, cats often defecate into litter boxes, with the contents disposed of in the garbage. This source is thus already controlled. However, some owners let their cats roam outdoors, in which case fecal matter is deposited in a random manner. Another important feline source is feral cat colonies. The general public is becoming aware of the negative implications such colonies have upon local wildlife (e.g., deaths of songbirds), and the generally adverse health effects on the cats. As a result. there has been a recent effort to aggressively trap, neuter, and release feral cats. Such programs reduce the number of feral cats over time and will be pursued. The County will investigate ways to partner with pet-related business (e.g., pet stores, veterinarians, rescue leagues) to promote spay/neuter



campaigns and control the negative effects of free-roaming cats.

Wildlife Waste. Urban wildlife includes deer, rats, raccoons, geese, ducks, pigeons, and other smaller mammals and birds. The bacteria and nutrient loads from those sources are not highly controllable and not directly related to the County's stormwater MS4 implementation goals, but some practices can help reduce the loadings to a small extent. Rats and other opportunistic feeders present potential health issues for County residents in the form of bacteria, parasites, and other health issues (e.g., fleas, ticks). One control method would be to ensure that all dumpsters and private trash cans are properly secured to deter nuisance wildlife. Another would be conducting public outreach and education discouraging littering (e.g., food scraps) and the purposeful feeding of nuisance wildlife. Over time, the number of nuisance wildlife should decline and not only reduce bacteria and nutrient loading, but also potentially improve community health.

## Household and Commercial Waste Disposal Measures

Additional potential sources of human and pet nutrient, BOD, TSS, and bacteria include leakages from trash cans, dumpsters, and garbage trucks containing diapers (as well as pet waste); boat and recreational vehicle discharges; and secondary sources such as pool and hot tub discharges. Measures to eliminate these sources include:

- Cover dumpster location to prevent rain from entering the containers and trash from blowing out due to wind.
- Implement programs or measures to eliminate leaks from garbage trucks.
- Conduct public education regarding covering private trash cans to prevent leaks and also to prevent nuisance wildlife from using the trash as a food source.
- Rigorously enforce a program for waste management on boats and RVs.

#### 5.1.2 BMP Identification and Selection

MDE currently groups urban BMPs into two types: structural and ESD practices (MDE 2009). The MDE ESD practices are:

- Alternative Surfaces. Green Roofs, Permeable Pavements, Reinforced Turf
- Nonstructural Practices. Disconnection of Rooftop Runoff, Disconnection of Non-rooftop Runoff; Sheetflow to Conservation Areas
- Micro-scale Practices. Rainwater Harvesting, Submerged Gravel Wetlands, Landscape Infiltration, Infiltration Berms, Dry Wells, Micro-Bioretention, Rain Gardens, Swales, and Enhanced Filters

The MDE 2000 Stormwater Design Manual (MDE 2000) documents the structural BMPs, which include wet ponds, wetlands, filtering practices, infiltration practices, and swales. MDE also describes nonstructural BMPs—not to be confused with the nonstructural ESD practices—that include programmatic, educational, and pollution prevention practices that, when implemented work to reduce pollutant loadings. Examples of nonstructural BMPs include implementation of strategic disconnection of impervious areas in a municipality (MDE 2009), street sweeping, homeowner and landowner education campaigns, and nutrient management (e.g., fertilizer usage).

The County has implemented and will continue to implement ESD, structural BMPs, and nonstructural practices to meet its programmatic goals and responsibilities including MS4 permit compliance, TMDL WLAs, flood mitigation, and others.

The steps presented in Figure 5-1 were followed when WTM (section 3.2) was used to identify specific retrofits and BMPs for treating impervious surfaces as described below.

- Existing BMP retrofits to enhance load reductions
- Load reductions from public ROW projects
- Load reductions from public institutional projects
- Load reductions from commercial/industrial land uses
- Load reductions from residential properties

The initial focus of BMP identification and selection targets retrofitting (i.e., improving) the first generation of stormwater practices—such as dry ponds, which are not very effective—and bringing them into conformance with current water quality standards. If the load reduction goals were not met, the focus shifts to treating the impervious surfaces throughout the MS4 areas of the watershed.

The impervious areas are split into four categories: public ROW, public institutional, commercial/industrial, and residential. There is a varying degree of difficulty in implementing BMPs on each type of surface. Similarly, there is a varying degree of difficulty in implementing BMPs within each type. To accommodate these variations, the County first considered which BMPs might be *relatively easy* to implement on each type of surface for the initial cycle compared to the BMPs that would be necessary for the required load reduction. The initial assumption is that 50 percent of each land use type will be retrofitted *relatively easily*. If gaps still exist in necessary load reductions after the first cycle, then in the next cycle, an additional 20 percent of each type will be retrofitted. In the third cycle, a further 20 percent will be retrofitted. If a gap still exists after the third cycle and a fourth cycle is needed, then the remaining 10 percent will be retrofitted. This process is being used solely for planning level purposes. During implementation, the County could use different percentages based on actual implementation opportunities.

The first type of impervious surface to be treated is public ROWs. If load reduction gaps still exist, then the next step is to determine if institutional properties (e.g., religious institutions, government offices, and facilities and municipally owned organizations [i.e., libraries, fire stations, and schools]) could help to fill the remaining gap. Next, the focus shifts to commercial and industrial land and finally to residential land. These land-use types were prioritized according to increasing complexity for planning and implementation of stormwater controls. For example, a ROW is least complex because it is public property and typically constitutes about 15–20 percent of total impervious area within a subwatershed. Stormwater controls within a ROW can be retrofitted with moderate effort. This process is repeated for each cycle.

The County recognizes that significant outreach, education, and establishment of standards (ordinances) and/or direct grant programs will be needed to support widespread implementation of stormwater controls on private properties (e.g., commercial, industrial, and residential).

## WTM Modeling for BMP Identification

WTM (described in section 3.2) was modified to include the ability to quantify the number of acres of treated impervious area required to meet the County's implementation load reduction goals. The modifications allow WTM to use different factors—such as looking at land use in addition to land cover—that are necessary to follow the procedure laid out in Figure 5-1. For instance, the updated version of WTM accounts for load reductions and impervious area treated from current BMPs in the watershed. Other modifications account for load reductions from dry pond retrofits (along with their impervious area treated) and potential reductions from programmatic initiatives (e.g., pet waste and lawn care campaigns). These modifications established the main purpose of the modified WTM: to determine the amount of impervious area that requires treatment to meet the County's implementation reduction targets. Besides the overall load reductions from past and projected restoration activities, WTM calculates the estimate cost of the practices using the cost information that is discussed in Section 6.2.

For implementation planning, users can first identify programmatic activities (e.g., pet waste campaigns, street sweeping, tree planting) and determine the load reductions from these practices. A description of the load reduction process is available in a technical memorandum (Tetra Tech 2015b). Next users can identify the percent of ROW impervious area for treatment. If the watershed is not meeting its reduction goals, then the user can identify a percent of institutional

land impervious area for treatment, and so forth down the flow chart in Figure 5-1. These percentages are identified at the watershed scale and then disaggregated to the subwatershed scale.

The modified WTM setup allows users to assign a greater percent of ESD implementation to subwatersheds that are ranked higher, as described in section 5.2. The ranking categorizing the subwatersheds into quartiles is based on each subwatershed's generation of pollutants. In the WTM, the user can assign a different utilization factor to each quartile. For instance, the top quartile (the top 25 percent) can be assigned a utilization factor of 100 percent. If the subwatershed is slated to treat 70 percent of its 100 acres of ROW impervious area, then WTM would calculate the load reductions from 70 acres of treatment. If the same subwatershed was in a quartile with an assigned utilization factor of 80 percent, then WTM would calculate the load reduction from 56 impervious acres (100 acres  $\times$  70% overall ESD implementation for ROW  $\times$  80% utilization factor = 56 acres).

The modifications made to WTM allow the user to look at different options for programmatic activities (e.g., pet waste campaigns) and ESD placements in different land uses and different subwatersheds. They enable the user to quickly look at different options, not only to minimize the number of impervious acres in different land uses that need to be treated in each subwatershed (e.g., ROW, institutional), but also to help minimize the overall cost. As the restoration process continues, WTM can be used to help refine future activities. A detailed description of the process is available in a technical memorandum (Tetra Tech 2015b).

For the treated land cover areas, WTM separates directly connected impervious areas (direct runoff) from disconnected impervious areas. During this initial evaluation, only ESD practices that treat connected impervious surfaces and their upslope, disconnected areas were included. The disconnected impervious areas have reduced flow rates but have picked up pollutants by flowing over pervious turf surfaces. In addition to loads from the impervious surface, the runoff generally has higher pollutant concentrations, even though the volume decreases. Some of the disconnected runoff loads (particularly nitrogen) are conveyed by runoff that has infiltrated to the subsurface. During the modified WTM development, the disconnected pervious land cover concentrations were adjusted to match TMDL and MAST loadings, thus accounting for the contribution of subsurface loads.

When the BMP drainage area loads were computed, the loads from connected impervious areas are likewise separated from the disconnected areas. Although the disconnected areas treated are defined by their impervious surface area, the disconnected loads are represented by the entire disconnected area, including pervious turf cover. Most runoff from pervious surfaces follows subsurface pathways. This results in decreased effective concentrations for particulate pollutants such as phosphorus and TSS, while increasing concentrations of nitrogen, which is mostly dissolved. Therefore, the loads treated from disconnected impervious areas are both from impervious and pervious areas.

For BMP drainage areas, geospatial data shows that the proportion of pervious area is often several times that of impervious area. However, unlike disconnected impervious areas, pervious source areas have much lower runoff volumes, thus resulting in lower loads than impervious areas. Therefore, the pervious area contributions to overall load from a land use are relatively minor and are not represented in the WTM. Therefore, the load reductions by BMPs in connected impervious

areas are slightly understated by WTM computations, resulting in a conservative implementation load reduction and providing an implicit margin of safety in the restoration plan.

## Retrofit of Existing BMPs

Existing BMPs were evaluated to see if any practices could be retrofitted with more efficient practices to achieve larger pollutant load reductions. For example, dry ponds can be retrofitted to increase their load reductions. A dry pond reduces nitrogen only by 5 percent, phosphorus and sediments by 10 percent, and BOD by 27 percent. Converting dry ponds to the wet pond efficiency practice (providing reductions of 33 percent for nitrogen, 52 percent for phosphorus, 66 percent for sediments, and 63 percent for BOD) will improve pollution reduction. These are simple solutions that can be achieved at reasonable costs and in a short time span.

DPW&T currently implements stormwater management facility restoration and environmental enhancement projects under the Deficient Ponds Program. Prioritizing and selecting projects is based on the review of consultant inspection report findings and detailed site inspections conducted by DPW&T. The program focuses on facilities that were identified as having moderate or severe problems. Typically, these retrofits do not increase potential removal efficiencies; however, the County intends to address water quality enhancements in dry ponds identified as candidates for retrofits. Some of these ponds were designed under now-outdated design criteria. Improvements, such as retrofitting to current ESD standards, would increase their pollutant reduction potential.

## Rights of Way

The ROW is public space along roads that is owned and maintained by the County. It represents a high-priority area for restoration and will be a major focus of the County watershed restoration efforts. In general, the urban densities increase inside the Capital Beltway to the Washington, DC, boundary and decrease outside the Beltway. Roads can be classified as either closed (roads bounded by curbs or gutters) or open (roads bounded by lawns and other vegetation without the presence of curbs or gutters). The local roads which serve these communities can be organized into a number of groupings which include:

- Urban open section with no sidewalk
- Urban closed section with curb and gutter, but no sidewalk
- Urban closed section with curb, gutter, and sidewalk
- Suburban open section with no curb, gutter, or sidewalk
- Suburban closed section with curb, gutter, and sidewalk

County ROWs can be present along each of these road groupings. Examples of these different groupings are presented in Figure 5-2. Each grouping has its own set of potential BMPs. Table 5-1 is a matrix of each road grouping and potential BMPs. Appendix A shows examples of select BMPs. The BMP designs will follow the criteria given in the MDE Design Manual (MDE 2000, 2009).



Urban open section with no sidewalk: Mt. Rainier–Varnum Street.



Urban closed section with curb, gutter, and sidewalk: Mt Rainier–39th Place.



Suburban closed section with curb, gutter, and sidewalk: Kettering–Herrington Drive.

Source: Google Maps

Figure 5-2. Examples of urban road groupings.



Urban closed section with curb and gutter but no sidewalk: Capitol Height–Balboa Avenue.



Suburban open section with no curb, gutter, or sidewalk: Glen Dale–Dubarry Street.

Table 5-1. Potential BMP types per urban road grouping

Potential BMP	Urban Open Section with No Sidewalk	Urban Closed Section with Curb and Gutter but No Sidewalk	Urban Closed Section with Curb, Gutter, and Sidewalk	Suburban Open Section with No Curb, Gutter, or Sidewalk	Suburban Closed Section with Curb, Gutter, and Sidewalk
Permeable pavement or sidewalks	Χ	Х	Χ	Χ	Χ
Permeable pavement shoulder instead of grass shoulder/buffer	X			X	
Curbside filter systems		X	Χ		Χ
Curb extension with bioretention or bioswale		Х	Х		Χ
Curb cuts to direct runoff to an underground storage/infiltration or detention device		Х	Х		Х
Grass swales and bioswales				Х	
Bioretention or bioswales to convert right-of-way to a green street				Х	Х
Infiltration trenches with underdrains				Х	

#### **Institutional Land Use**

Existing institutional land uses also offer many opportunities for BMP retrofits. These land uses include both County and nonprofit organization properties such as schools, libraries, places of worship, parks, government buildings, fire and police stations, hospitals, and other facilities, but exclude roadways. The County has initiated discussions with the board of education and State Highway Administration to coordinate and take advantage of available land for BMP retrofits.

The first step for each identified facility is to evaluate whether the impervious area disconnection credits apply or can be applied with a simple BMP retrofit. Most of the facilities have substantial areas of impervious cover—including rooftops, driveways, and parking areas—that offer opportunities for cost-effective retrofits. A BMP retrofit priority matrix is applied to these sites on the basis of the impervious cover type, as shown in Table 5-2. Table 5-2 looks at practices that are suitable for micro-scale BMPs. For example, it would be unusual to implement a pond or wetland BMP to treat a small roof area, but most of the MDE ESD practices identified in the table would be appropriate for that use. The retrofit priority matrix will help in the selection process and identify the practices that offer the highest pollutant removal at the lowest cost.

Table 5-2. Impervious Area BMP retrofit matrix for institutional areas

		Impervious Cover Elements							
BMP Description	Roofs	Driveways	Parking	Sidewalks	Othera				
ESD to the MEP from the <i>Manual</i>									
Green roofs	Х								
Permeable pavements		Х	Х	Х	Х				
Reinforced turf		Χ	Х						
Disconnection of rooftop runoff	Х								
Disconnection of non-rooftop runoff		Χ	Х	Х	Х				
Sheetflow to conservation areas		Χ	Х						
Rainwater harvesting	Х								
Submerged gravel wetlands			Х						
Landscape infiltration	Х	Χ	Х		Х				
Infiltration berms									
Dry wells	Х								
Micro-bioretention		Χ	Х		Х				
Rain gardens		Χ	Х						
Grass, wet, or bioswale		Χ	Х		Х				
Enhanced filters	Х	Х	Х	Х	Х				
Structural Practices									
Hydrodynamic structures	Х		Х		Х				
Dry extended detention ponds			Х		Х				
Wet ponds/wetlands			Х		Х				
Infiltration practices			Х		Х				
Filtering practices		Χ	Х	Х	Х				
Tree Planting and Reforestation	'								
Impervious urban to pervious		Х	Х		Х				
Impervious urban to forest									
Planting trees on impervious urban		Х	Х		Х				
Tree planter		Χ	Х	Х	Х				

Note

### Commercial/Industrial Land Use

Numerous commercial and industrial properties are present throughout the County. Because those areas are privately owned, the County has implemented the Rain Check Rebate and Grant Program (section 4.2), administered by DoE, which allows property owners to receive rebates for installing Rain Check-approved stormwater management practices. Homeowners, businesses, and nonprofit entities (including housing cooperatives and places of worship) can recoup some of the costs of

<sup>&</sup>lt;sup>a</sup> Includes miscellaneous other impervious surfaces (e.g., basketball courts, tennis courts, patios).

installing practices covered by the program. Like the institutional areas, the commercial and industrial areas are characterized by large areas of impervious cover, including roofs, driveways, parking lots, and other paved areas. The majority of commercial and industrial facilities are privately owned and some have their own stormwater discharge permits. The County has limited influence on the use of BMPs on commercial and industrial properties to achieve retrofit objectives on these properties, with the exception of the public roads that serve these uses. However, the County has incentives associated with reducing the property's Clean Water Act (stormwater) fee in exchange for the design, construction, and/or maintenance of BMP facilities on these properties. These areas have similar BMPs to those for institutional areas as shown in Table 5-2.

Commercial and industrial properties are constantly undergoing renovation and redevelopment processes in response to current trends and requirements. The County plans to develop a survey of these properties to identify redevelopment trends, which, through partnerships, could be incorporated into the TMDL restoration strategies.

#### Residential Land Use

Residential areas include varying amounts of impervious cover, such as roof area, driveway and walks, and patios. Because those areas are privately owned, the County has implemented the Rain Check Rebate and Grant Program (section 4.2), administered by DoE, which allows property owners to receive rebates for installing Rain Check-approved stormwater management practices. Homeowners, businesses, and nonprofit entities (including housing cooperatives and places of worship) can recoup some of the costs of installing practices covered by the program. Installing practices at the individual property level helps reduce the amount of polluted stormwater runoff that enters the storm drain system. In addition, property owners implementing these techniques through the program will reduce their Clean Water Act Fee.

Residential areas make up 29 percent of the watershed (Table 2-2 and Figure 2-1). It is the most difficult to implement BMPs on residential areas because they are privately owned. There are opportunities for the County to form partnerships with apartment/condominium communities to install BMPs on common areas on the properties. Many of the practices in Table 5-2 could be used on residential land. The most common practices for individual homeowners would be permeable pavement, rooftop disconnection, rainwater harvesting (e.g., rain barrels), landscape infiltration, rain gardens, and planting trees. For row houses, the most common practices would be permeable pavement (on sidewalks leading to home and alleyways), rooftop disconnection, rainwater harvesting (e.g., rain barrels), and rain gardens. Apartment/condominium communities could install any of the practices listed in Table 5-2.

# **Evaluation of Impervious Area Disconnection Opportunities**

A group of practices and strategies that emerged from the 2000 and 2009 *Stormwater Design Manual* (MDE 2000, 2009) is referred to as nonstructural BMPs and includes:

- Rooftop disconnection
- Nonrooftop disconnection
- Disconnection to a conservation buffer

A number of existing opportunities in the County currently qualify for the impervious area disconnection credits but are not accounted for in the BMP database. These opportunities include buildings, both public and private, whose rooftops drain to pervious areas, or conservation areas and rural road sections with open sections that drain to roadside swales or other pervious areas. Impervious area disconnection is included in the WTM modeling as an ESD practice.

A desktop GIS analysis can identify many of these opportunities. In addition, the analysis can identify buildings and structures that do not currently meet all of MDE's criteria but could easily be retrofitted to meet the criteria. DPW&T has an effort underway to identify disconnected roads and areas in the County that could be easily retrofitted in the County.

Urban and urbanizing watersheds consist of a variety of land use types that include residential, parks and open space, institutional, commercial, and industrial. Typically the land use type with the largest area is residential, which ranges from high-density residential (such as apartments and townhouses) to low-density residential (lots with 2 or more acres).

#### 5.2 Subwatershed Prioritization

The subwatersheds were ranked and prioritized to aid in the selection of BMPs in the areas with the highest required pollutant loading reductions.

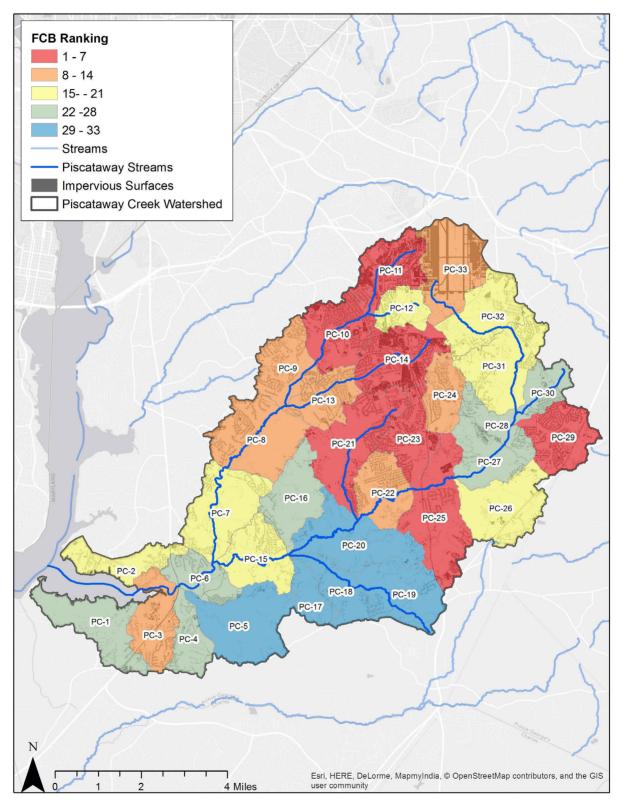
The County prioritized the subwatersheds by ranking the necessary total load reductions for each TMDL parameter and then averaging the individual ranks to obtain an overall rank for the subwatershed. Although not included in this restoration plan, PCBs are also included in the subwatershed ranking. The prioritization process ranked the 33 subwatersheds in the Piscataway Creek watershed, with number 1 being the highest priority ranking.

Table 5-3 presents the results of the subwatershed ranking evaluation, along with the available untreated impervious cover acres in each subwatershed. These areas are available for BMP implementation. Figure 5-3 shows the subwatershed rankings spatially for the Piscataway Creek watershed. The highest ranked watersheds tended to be in areas with the largest amount of impervious cover. Subwatersheds PC-11 and PC-14, which are at the headwaters to Tinkers Creek, were the highest ranked for fecal coliform bacteria, and thus are the highest ranked subwatersheds as a whole. This area is bounded by a variety of urban land uses that could be used for BMP implementation. The available impervious cover in Table 5-3 represents the impervious area that contributes to the County's MS4 loadings and is available to the County for BMP implementation; therefore, it does not include impervious cover on state or federal land.

Table 5-3. Subwatershed prioritization ranking

Sub-	Pollutant Rank (Baseline Loadings)	Available Impervious Cover (acres)							
watershed ID	Fecal Coliform Bacteria	Total	ROW/ Transportation	Institutional	Commercial & Industrial	Residential			
PC-1	26	47.7	0.1	0.9	10.9	35.8			
PC-2	20	82.2	0.5	3.2	6.9	71.6			
PC-3	13	132.7	1.0	27.5	1.0	103.1			
PC-4	24	59.4	0.6	7.3	0.0	51.4			
PC-5	32	6.6	0.4	1.1	0.0	5.1			
PC-6	22	84.4	0.0	4.1	0.0	80.3			
PC-7	18	118.5	0.6	0.9	1.2	115.7			
PC-8	14	154.5	1.0	18.9	13.0	121.6			
PC-9	8	194.6	1.8	9.3	2.5	181.0			
PC-10	3	275.7	7.8	11.6	46.0	210.3			
PC-11	2	126.4	8.4	3.9	63.3	50.7			
PC-12	17	23.4	2.2	0.2	8.6	12.4			
PC-13	11	142.8	0.4	7.8	6.5	128.1			
PC-14	1	489.8	28.4	17.4	220.1	223.9			
PC-15	19	97.4	0.3	1.2	0.4	95.6			
PC-16	27	45.2	1.2	0.2	4.4	39.4			
PC-17	33	6.6	0.0	0.0	0.0	6.6			
PC-18	30	22.4	0.0	0.0	0.0	22.4			
PC-19	31	26.7	0.1	0.0	6.0	20.5			
PC-20	29	33.6	0.1	0.0	4.8	28.7			
PC-21	5	189.6	2.3	18.4	9.4	159.6			
PC-22	12	153.3	0.5	3.3	5.9	143.7			
PC-23	6	232.3	2.3	27.0	16.8	186.2			
PC-24	10	146.5	0.3	4.6	2.9	138.7			
PC-25	7	181.4	1.0	36.9	10.4	133.1			
PC-26	21	39.2	2.3	0.0	9.3	27.6			
PC-27	28	10.6	0.1	0.0	0.0	10.5			
PC-28	23	67.5	0.0	0.0	0.0	67.4			
PC-29	4	230.5	8.0	11.1	0.2	211.2			
PC-30	25	66.5	0.8	0.4	0.0	65.3			
PC-31	15	145.8	0.3	4.1	0.0	141.3			
PC-32	16	144.7	3.4	5.0	37.9	98.4			
PC-33	9	0.0	0.0	0.0	0.0	0.0			

Note: Subwatersheds are ranked 1 through 33, with 1 being the highest priority subwatershed.



Note: Subwatersheds are ranked 1 through 33, with 1 being the highest priority subwatershed.

Figure 5-3. Subwatershed prioritization in the Piscataway Creek watershed in Prince George's County.

## **6** IMPLEMENTATION DISCUSSION

This section describes the County's implementation processes to improve water quality and meet the goals and objectives of the restoration plan. It includes specific planned actions, cost estimates, and a proposed schedule, as well as descriptions of the financial and technical resources available to support and implement the restoration plan. This section also describes how the public will be involved throughout implementation, both in terms of keeping the public informed and by involving them directly in the implementation actions. As part of this plan's adaptive management strategy (section 7.3), DoE will perform a biennial review of programs starting in 2015 to assess restoration progress and public involvement. Part of the review will be to identify ways to improve community involvement and increase the rate of restoration activities (both BMPs and programmatic initiatives).

## 6.1 Proposed Management Activities

This section presents the implementation portion for the Piscataway Creek watershed restoration plan, which is focused on achieving the load reductions presented in Section 3.3. Using the procedure outlined in Section 5.1, this restoration plan proposes both BMP implementation and programmatic initiatives. The restoration plan creates the overall blueprint for restoration activities in the Anacostia River watershed. Although BMP types and locations are not explicitly specified, the plan will allow the County the flexibility to identify specific locations and to work with partners (e.g., to install BMPs on institutional or private land). It also will allow the flexibility of selecting suitable ESD practices on the basis of factors such as costs, land availability, feasibility, and pollutant-removal efficiencies. Figure 6-1 presents conceptual art of a city block with different ESD practices on institutional, commercial, and residential property. Note that this figure includes some practices that are not specifically mentioned in the plan, but that could be incorporated into it on the basis of County priorities and future goals, as well as MDE approval.



Credit: EPA OWOW

Figure 6-1. Conceptual city block with ESD practices.

## 6.1.1 Restoration Plan Programmatic Initiatives

As previously stated, the County's existing programmatic practices are expected to continue and will be supplemented with additional practices to make up the programmatic strategies for this restoration plan. Many of these strategies rely on public education and outreach. Section 6.6 of this restoration plan deals specifically with public involvement in the restoration implementation process, which includes public education. These activities will first focus on the areas in the watershed that have the most need for load reduction and then will continue throughout the watershed. Load reduction progress will be monitored throughout restoration plan implementation. Programmatic strategies will be modified as needed to ensure continued load reduction. One potential method for feedback on the implementation is conducting surveys to see where public behavior has changed regarding lawn care or pet waste disposal practices. If the

behavior has not changed as much as anticipated, then more outreach could be enacted in another form or by using a slightly different public engagement approach.

## **Existing Practices (from Section 4.2)**

The existing practices that could have a quantifiable effect on water quality are in this section. There are other practices listed in section 4.2, however, not all of them have quantifiable load reductions.

- Clean Water Partnership (CWP) Program. The CWP initially focuses on ROW runoff management for older communities, which are inside the Capital Beltway (Interstate 495). The program is expected to be responsible for providing water quality treatment for up to 2,000 acres of impervious land over the next 3 years at a cost of approximately \$64 million (\$14 million the first year, followed by \$25 million each of the following 2 years); however, these numbers might be adjusted. Any BMPs installed as a result of this program would be credited towards the ROW BMPs identified in section 6.1.2.
- Rain Check Rebate and Grant Program. This program started in 2013. Forty properties have received the rebate to date. However, for these practices to receive credit for this TMDL restoration plan, they will need to be verified by the County. The acreage that will be treated using this program has not yet been estimated. The restoration plan calls for additional public outreach to inform County residents of this program. Outreach could target homeowner associations, community groups, or neighborhood associations. The County has allocated \$3 million for the implementation of the Rain Check Rebate and Grant Program. Currently, rebates are capped at \$2,000 for residential properties and \$20,000 for commercial properties, multifamily dwellings, nonprofit, and not-for-profit groups.<sup>3</sup> The program is currently setup to provide rebates for up to 500 practices per year. If interest in the program results in the possibility of this maximum number being exceeded, the County could increase the 500 per year limit by shifting more funds to cover administrative costs. Any BMPs installed as a result of this program would be credited towards the appropriate BMP group identified in section 6.1.2.



<sup>&</sup>lt;sup>3</sup> http://www.cbtrust.org/site/c.miJPKXPCJnH/b.9146461/k.6D3F/Prince\_George8217s\_Rain\_Check\_Rebate.htm. (accessed September 2014).

- Alternative Compliance Program. This program has only recently started; thus, there are no current load reductions from it. The restoration plan calls for additional outreach to inform County nonprofit organizations of this program. Approximately 10 percent of the religious organizations that agree to provide easements on their properties are expected to install BMPs annually. The Clean Water Act fee database includes an estimated 240 accounts (one religious facility can have multiple accounts) for religious organizations that are eligible for this credit in the Piscataway Creek watershed. These organizations' properties include approximately 102 acres of treatable impervious area. Therefore, using the 10 percent estimation, about 10 acres of impervious area could be treated annually under the Alternative Compliance Program. Any BMPs installed as a result of this program would be credited towards the institutional BMPs identified in section 6.1.2.
- Countywide Green/Complete Streets Program. No projects have been completed as of the date of this document; however, some projects are in the design phase and will go into construction in fiscal year 2015. The acreage that will be treated using this program has not yet been estimated. Any BMPs installed under this program would be credited towards the ROW or institutional BMPs as identified in section 6.1.2.
- Treet Sweeping and Storm Drain Maintenance. DPW&T is in the process of evaluating the street sweeping program to improve program tracking, capture water quality efficiencies and report programmatic achievement for alternative BMP watershed restoration credit reporting. As the first step in the analysis, the roads serviced during this reporting period have been mapped. This information will be used to improve water quality efficiencies and potentially shift roads swept to more sensitive watersheds, increase sweep cycles, or add more resources with additional roads. Programmatic improvements also under consideration include:
  - Consider servicing less roads and increasing the frequency in order to achieve the full level of credit. MDE requires roadways swept a minimum of twice per month for full credit. Currently DPW&T is servicing roads about once a month.
  - Shift services roads to sensitive subwatersheds.
  - Add additional roads swept in sensitive subwatersheds.
  - Use ARCGIS to link all cycle data to the map and data table. This will improve documentation for NPDES reporting and eliminate duplicative entry in a separate excel spreadsheet.

The street sweeping program's mission was not originally intended for water quality credit, therefore a further analysis of the costs involved and the benefit derived for targeting the program will need to be fully evaluated.

- Illicit Connection and Enforcement Program. As part of its BMP inspection and maintenance programs, the County has recently established an illicit discharge detection and elimination initiative. This initiative can have substantial benefits in pollutant reduction. The progress of this initiative will be reported annually and identified locations will be geo-referenced to be accounted for in the County's TMDL restoration plan.
- *Litter Control*. The County will increase its litter control practices. There are expected to be nutrient, TSS, BOD, and bacteria load reductions associated with litter control,

- however, these could not be quantified. The load reductions will come from reducing improperly disposed of food waste (which in turn feeds nuisance wildlife that deposit bacteria in fecal matter) and other organic materials available to enter the storm sewer system and eventually settle to stream beds.
- *Master Gardeners*. The program has the potential to aid in the overall reduction of fertilizer and pesticide use, as well as to promote increased use of stormwater practices such as rain gardens and rain barrels. The acreage that will be treated using this program has not yet been estimated. Any BMPs installed as a result of this program would be credited towards the residential BMPs identified in section 6.1.2.
- Flood Awareness. This program encourages implementing flood-prevention stormwater practices (e.g., BMPs) such as permeable pavers and rain gardens to help prevent costly property damage that can result from backyard flooding. The acreage that will be treated using this program has not yet been estimated. Any BMPs installed as a result of this program would be credited towards the residential or commercial BMPs identified in section 6.1.2.
- Transforming Neighborhoods Initiative (TNI). This initiative has the potential to use environmental restoration, stormwater management practices, and environmental education as tools to help transform depressed neighborhoods while also creating safer, more inviting community environments. The acreage that will be treated using this program has not yet been estimated. Any BMPs installed as a result of this program would be credited towards the residential BMPs identified in section 6.1.2.
- Animal Management. The Animal Management Division will continue with its current programs, including adoption events, spay and neuter clinics, and public education events. These activities help reduce the number of stray animals in the County, thus reducing the amount of animal waste that is not properly disposed of. The Division tracks the number of stray animals that are taken to County facilities. This information can help determine if the overall stray population is decreasing. The Animal Management Division is also responsible for removing dead animals from roadways. This prevents nutrients and bacteria loads from the decomposing animals from entering the stormwater network, and thus the County's water bodies. These load reductions, however, are not able to be determined.

## **Proposed Enhancements (from Section 5.1.1)**

Domestic and Urban Animal Source Control. If not disposed of properly, pet waste can contribute to significant bacteria loadings in addition to nutrient and BOD loadings to local waterways. An effort is currently underway to develop a pet waste outreach campaign. When developing the campaign strategy, the County will determine exactly what methods and materials will be used to reach target audiences about proper disposal of pet waste. The County will be specifically looking at ways to increase the amount and use of pet waste bag dispensers throughout priority subwatersheds. Being able to track bag usage will tie into already established approaches for calculating pollutant load reductions from pet waste education programs, such as the one implemented by the District of Columbia Department of Environment. The strategy will also identify ways the County will evaluate the effectiveness of pet waste outreach efforts to get a better sense of the level of behavior change the public has adopted. Evaluation methods could

include a phone survey, intercept surveys at pet adoption events, email surveys of workshop/meeting attendees, online website visitor surveys, data on the number of pet waste bags used monthly at dog parks, and other potential ways to determine if citizens are following through with pet waste pickup. Figure 6-2 presents the locations of known dog licenses and where stray dogs and cats have been found since 2010; this information provides a guide to areas that should be targeted by the County. Future dog parks should contain pet waste disposal stations and should be sited away from water bodies. This approach will allow a greater flow path for treatment of the nutrient- and bacteria-enriched runoff from the dog park. The addition of a grass or brush buffer would provide additional treatment of the stormwater runoff.

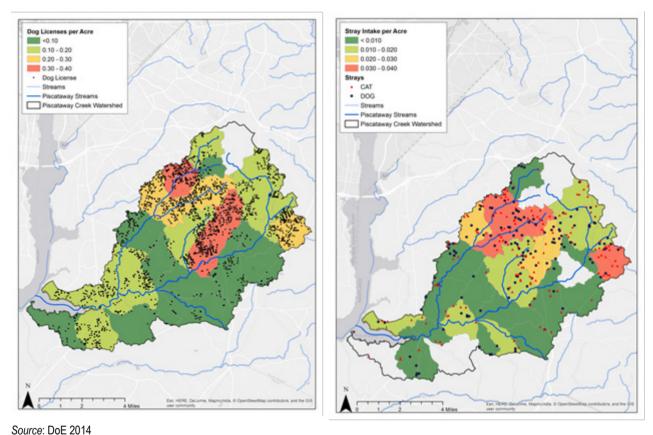


Figure 6-2. Locations of dog licenses and stray animal intake sites.

- Household and Commercial Waste Disposal Measures. There are other potential human and pet sources of nutrient, BOD, TSS, and bacteria as well. These are primarily comprised of leaky trash cans, dumpsters, and garbage trucks containing diapers (as well as pet waste); boat and recreational vehicle discharges; and secondary sources such as pool and hot tub discharges. The County intends to explore initiatives to:
  - Create a program to encourage covering dumpsters to prevent rainwater from entering (which would then leak out, carrying nutrients and bacteria) and trash from blowing out due to wind.
  - Research ways to eliminate leaks from garbage trucks.

- Provide public education regarding covering private trash cans to prevent leaks and also to prevent nuisance wildlife from using the trash as a food source.
- Enforce waste management on boats and recreational vehicles to prevent sanitary waste from entering County water bodies.

Dumpsters can be a source of nutrients, oxygen demanding substances, and bacteria. Improperly covered dumpsters and waste containers collect rainwater that can discharge with elevated levels of pollutants through leaks and holes in the bottom of the receptacles and then enter storm drains. Commercial dumpsters can contain food waste and rodent droppings, while residential receptacles and dumpsters can contain food waste, diapers. or pet waste. Leaks can also occur when the waste receptacles are emptied or when the receptacles are washed. Washing facilities (e.g., vehicles, equipment, dumpster concrete pads) can contribute nutrients, oxygen demanding substances, and bacteria to the County's MS4 network. Washwater should be directed to sanitary sewers, where it can be treated. Several municipalities have dumpster and waste receptacle management, and washing facility outreach programs (ADES 2014, City of Knoxville 2012, DPWES 2014). The city of Knoxville issues fines for leaking dumpsters (City of Knoxville 2012). Several municipalities have dumpster and waste receptacle management outreach programs (ADES 2014, City of Knoxville 2012, DPWES 2014). These ordinances and outreach materials will be reviewed to develop a program for the County. Some activities will include having property owners inspect dumpsters for leaks, properly cover waste receptacles (e.g., receptacle covers or stored in covered areas), and employ berms when conducting washing activities to keep runoff out of storm sewers.

#### 6.1.2 Restoration Plan BMPs

Given the preceding programmatic measures, a substantial amount of the loads can be removed before allocating structural BMPs. After programmatic initiatives were applied, the general approach in the strategy development was to first upgrade dry ponds (which have a low pollution-reduction efficiency), then install ESD BMPs at public ROW and public areas, such as County government buildings, parks, and schools. If additional load reduction is needed, this restoration plan suggests that the County form partnerships with other entities (e.g., places of worship, commercial centers, industries, and apartment/condominium communities) to install BMPs on private land. Section 5.1.1 identified the potential types of BMPs appropriate for specific land uses.

Table 6-1 presents the number of impervious acres that are projected to require treatment using dry pond retrofits and ESD BMPs in the Piscataway Creek watershed. Appendix B presents the impervious acres for each subwatershed.

Even though the restoration strategy first looked at ROWs, the County can install BMPs on any land-use type as opportunities arise. In other words, the restoration plan does not limit the County to install BMPs on ROWs to the maximum capacity before moving onto other types of properties. The restoration strategy initially suggests installing BMPs on public ROWs, but the County can choose to install similar BMPs to treat other land uses (e.g., County facilities) to obtain similar

load reductions. In addition, BMPs installed for other purposes, such as redevelopment, can be counted towards the totals in Table 6-1.

Table 6-1. Needed acres of impervious area treated by dry pond retrofits and ESD practices

		Dry Pond Retrofit	ESD (Impervious Acres Treated)					
Subwatershed	Number of Dry Pond Retrofit	(Impervious Acres Treated)	ROW	Institutional	Commercial/ Industrial	Residential		
Tinkers	2	15.8	197.6	26.9	156.8	33.6		
Main Stem of Piscataway Creek	7	56.8	216.3	36.1	38.1	221.8		
Total	9	72.5	413.9	63.0	194.9	255.4		

Note: It is assumed that 1 ESD BMP will treat 1 acre of impervious area.

#### 6.1.3 Estimated Load Reductions

Calculations to determine the load reductions from BMPs and programmatic initiatives were added to the WTM spreadsheet that was used to determine the implementation load reduction goals (section 3.2). This load reduction analysis was performed using the steps presented in Section 5.1. After each step, the estimated load reductions were compared to implementation load reduction goals to determine the remaining load reduction gap. The steps were followed and repeated until the implementation load reduction goal was met by the estimated load reductions. The steps were:

- 1. Load reductions from current BMPs, along with their impervious drainage area, were input into the WTM and subtracted from the necessary load reduction and available impervious area, respectively.
- 2. The load reductions from existing programmatic initiatives were subtracted from the necessary load reductions.
- 3. The load reductions from recommended programmatic initiatives were subtracted from the necessary load reductions.
- 4. The load reduction difference between dry ponds and wet ponds was subtracted from the necessary load reductions.
- 5. Proposed BMPs and their associated load reductions and impervious area treated were subtracted from the necessary load reductions. This was first done for ROWs, then institutional land, followed by commercial and industrial land, and lastly residential land.

The resultant final load reductions (from programmatic initiatives and BMP implementation) are presented in this section. Load reductions from current BMPs are presented in section 4.3.2.

### **Programmatic Initiatives**

Estimating potential load reductions from programmatic initiatives is challenging since some of the initiatives require public participation and a change in long-standing behaviors. Therefore, several assumptions are required. The County has accounted for the need to reevaluate the

estimated load reductions in the future in its adaptive management approach (section 7.3). This section discusses load reductions from several of the programmatic initiatives. Some of the programmatic initiatives result in BMPs being installed. These programs are not discussed in this section because their impacts are reflected in the load reductions from BMPs, as shown later in this section. These BMP-related programs are the Stormwater Management Program, CWP, Rain Check Rebate and Grant Program, countywide Green/Complete Streets Program, Alternative Compliance Program, Flood Awareness campaigns, and Transforming Neighborhoods Initiative. Specific programmatic initiatives include:

- Street Sweeping, Catch Basin Cleaning, and Storm Drain Vacuuming. MDE has identified ways to calculate the pollutant load reduction associated with street sweeping through the mass loading approach and the street lane approach (MDE 2014a, Appendix D). Because the County's frequency of street sweeping does not meet the credit requirements of the street lane approach, mass loading approach is used to calculate the load reductions. For the mass loading approach, the street dirt collected is measured in tons at the landfill or ultimate point of disposal. The pollutant load removed is then based on a relationship between the pollutant load present in a ton of street dirt dry mass. This relationship is 3.5 lb for total nitrogen, 1.4 lb total phosphorus, and 420 lb TSS per ton if the same piece of road is swept 25 times per year (MDE 2014a).<sup>4</sup> During 2013, 21 miles of roads in the watershed were swept by the County, but this value fluctuates by year. Any additional miles will help in the adaptive management of the restoration plan if other strategies fall short of their goals.
- Pet/Animal Waste Campaigns. For this programmatic initiative, the estimated load reductions assume significant compliance with pet waste education measures by the County citizens. For the restoration plan, it was assumed that there will be a 65 percent compliance rate due to increased public education, strict dog waste laws and access to pet waste stations and bags. Additional load reductions can be achieved if stray dog and cat populations are reduced by the use of spay and neuter campaigns (for either pet or stray animals), fines for abandoning pets, and adoption fairs. Because these are low cost efforts with the potential for large load reductions (Table 6-7), efforts to promote pet waste education, pet waste regulations, and stray pet controls will be aggressively approached in the initial phases of the implementation of this restoration plan. The number of newly issued dog licenses (5,062) and stray intake animals (487) from 2010 to 2013 for the watershed was obtained from DoE's Animal Management Division. The exact number of animals is expected to be greater, thus providing a conservative estimate of the number of dogs and stray animals in the watershed.

DoE has retained a contractor to develop a public outreach and education campaign on pet waste. This program will be conducted over multiple years. At the end of the program, the County will be able to estimate the loading reductions achieved. Differences between those reductions and the reductions used in this restoration plan will be addressed as part of the adaptive management of this plan.

Addressing urban nuisance wildlife is another way to reduce nutrient, BOD, and bacteria loads. By reducing food sources, the nuisance wildlife population is expected to

<sup>&</sup>lt;sup>4</sup> In November 2015, a Chesapeake Bay Program expert panel proposed new street sweeping guidelines and load reductions. The panel expected to have their recommendations approved in early 2016. Any change in load reductions will be addressed in future revisions and the adaptive management of this restoration plan.

- decrease, thus reducing nutrient, BOD, and bacteria loadings to local streams. A decreased population offers additional public health benefits from the reduction of sources of ticks, rabies, and other public health concerns. This reduction is difficult to quantify and estimate, partly because of the lack of information on current animal populations, locations, and the amount of involvement of County residents and businesses will have on the reduction strategies. No load reductions from wildlife are provided in this restoration plan.
- Household and Commercial Waste Disposal Program. The loads from dumpsters and washing facilities that are discharged directly into the MS4 system can be considerable. These loads will be addressed with a comprehensive program to upgrade dumpsters and trash bins to make them leakproof and to add covers. Additionally, uncontrolled washing facilities will be identified and controlled. It is assumed that a 65 percent adoption rate of such programs will be obtained in the Piscataway Creek watershed. An estimated 926 dumpsters were used in the modified version of WTM (Tetra Tech 2015b).

Although percent removal efficiencies can be determined for BMPs and some programmatic activities, it is not possible to estimate the load reduction capabilities of other programmatic activities, such as storm drain stenciling or litter control. The cumulative effects of these activities will help reduce loads entering local water bodies, thus improving their health. The impacts of these activities are not calculated as part of this plan, however, these activities do form an important part of this plan. Most of them serve to educate the public on how they can help improve water quality. The improvements in water quality from these activities will be reflected through adaptive management, where the County will assess the cumulative improvements in the water quality and health of water bodies under the restoration plan.

# **Proposed BMP Implementation**

Table 6-2 represents the load reductions achieved with the dry ponds retrofits (to more efficient BMPs) and with ESD practices implemented on each urban land use type. Appendix B presents the estimated load reduction for each subwatershed by land use. Commercial land presents the fewest opportunities for load reduction. Over half of all load reductions are estimated to be obtained from residential land. It is possible to meet the County's MS4 WLA (42.6 percent reduction) without requiring all publicly and privately owned impervious land treated. As a result, the majority of load reductions can occur on the public ROW. Treating 6 percent of residential impervious area resulted in half of the load reduction from treating all the institutional impervious areas and greater load reductions from commercial/industrial impervious areas.

Table 6-2. Piscataway Creek watershed fecal coliform bacteria load reductions (MPN B/yr)

			ESD Practices on						
Watershed	Dry Pond Retrofit	ROW	Institutional	Commercial/ Industrial	Residential	Total			
Tinkers Creek	1,321	47,396	5,973	28,469	11,084	92,923			
Main Stem of Piscataway Creek	5,552	64,901	7,677	3,902	82,118	158,599			
Total	6,873	112,297	13,651	32,371	93,202	251,522			

It is expected that some of the ROW BMPs will be installed by the CWP. The CWP is expected to treat 2,000 acres of impervious areas within the next 3 years countywide, but will focus on the older sections of the County, which are inside the Capital Beltway. Similarly, some of the institutional BMPs will be installed as part of the County's Alternative Compliance program, while some BMPs on commercial, industrial, and residential land will be installed as part of the County's Rain Check Rebate and Grants Program. Since these programs have been launched recently, the County does not have long-term data on the estimated number of BMPs or the estimated load reductions from the programs. Once more data is available in subsequent years, such as, installed BMPs, treated land use types, and level of public participation, estimates will be made on the load reductions from these programs.

### **Estimated Overall Load Reductions**

Table 6-3 presents the load reductions for the different restoration activities (BMPs and programmatic initiatives). Appendix C presents these loadings against the loadings from the Chesapeake Bay TMDL. This highlights the relative importance of programmatic initiatives to reduce fecal coliform bacteria loads. These load reductions are based on a 57 percent reduction of existing loads achieved through implementation of pet waste, dumpster, and washing facility programs.

Table 6-3. Comparisons of load reductions (MPN B/yr) by restoration strategies for Piscataway Creek

Watershed	Dry Pond Retrofit	ESD Practices	Pet Waste Campaign	Dumpster Programs	Washing Programs
Tinkers Creek	1,321	92,923	136,990	7,708	16,901
Main Stem of Piscataway Creek	5,552	158,599	166,851	9,395	20,628
Total	6,873	251,522	303,840	17,103	37,529

Table 6-4 presents the resultant overall load reductions for the Piscataway Creek watershed. In this case, there was a small reduction from existing BMPs implemented since the TMDL was developed. The majority of reductions came from a combination of the ESD BMPs and the programmatic initiatives discussed above. In the case of the Piscataway Creek watershed, the WLA will be met by the overall implementation of the programmatic initiatives and ESD BMPs.

Table 6-4. Total fecal coliform bacteria load reductions (MPN B/yr) in the Piscataway Creek watershed

Watershed	Implemen- tation Model Baseline from WTM	Percent Reduction from MDE TMDL Data Center	Implemen- tation Model Target Load	Required Implemen- tation Model Reduction from WTM	Reduction from Current BMPs	Remaining Reduction or Reduction Gap	Reduction from Restoration Plan Strategies	Remaining Reduction
Tinkers Creek	622,561	42.60%	357,350	265,211	9,844	255,367	255,843	0.00%
Main Stem	900,086	42.60%	516,649	383,437	23,006	360,430	361,024	0.00%
Total	1,522,647	42.60%	873,999	648,648	32,850	615,798	616,866	0.00%

## 6.1.4 Additional Measures

Other measures, noted below, can further reduce loads of nutrients, BOD, TSS, and bacteria. However, these measures are not considered part of the County's MS4 WLA requirements and, therefore, load reduction estimates were not calculated. Similarly, they are not included in the cost estimate or implementation schedule.

### On-Site Disposal System Repair and Replacement

Nutrient and BOD loads from failing septic tanks are not part of the County's stormwater MS4 load reductions. Upgrading septic systems or connecting houses to a sanitary sewer system will help the overall achievability of the TMDLs. However, it is difficult to accurately predict the number of failing septic systems or the number of failures addressed through septic system upgrades or removal (after homes are connected to sanitary sewers). If the number of failing septic systems (or even the number of septic systems in general) is reduced significantly, it might help reduce the number of stormwater BMPs that are required for water bodies to meet applicable water quality criteria in the watershed. This would be determined through monitoring and the restoration plan's adaptive management approach. Load reductions associated with septic system maintenance, enhancements, and conversions can be used by local governments as alternative practices for meeting NPDES stormwater permit requirements as per MDE guidance (MDE 2014b).

### Sewer Repair and Rehabilitation

One source of fecal coliform bacteria to stormwater is aging sewer lines and manholes. There are more than 850 miles of sanitary sewers in the Anacostia River watershed. Of those, there are more than 100 miles of sewers that were installed before 1940 and another almost 300 miles that were built in the 1940s and 1950s. In extreme cases, aging sewer lines result in sanitary sewer overflows, which are quantified in the Anacostia River Watershed Existing Conditions Report (Tetra Tech 2014a). As a result, the single most effective measure to reduce sanitary sewer overflows is to repair and rehabilitate existing sewer lines. The Washington Suburban Sanitary Commission (WSSC) is under a 2005 consent decree with EPA to overhaul its sewer lines to reduce sanitary sewer overflows (SSOs) under their Sewer Repair, Replacement and Rehabilitation Program. As part of that program, improvements to leaky sewer lines could dramatically reduce human bacteria loads, along with nutrients, BOD, and sediment. Because this effort is not administered by the County, it is difficult to determine how much rehabilitation would be involved. Its cost would be borne by WSSC. However, loads from sewer overflows and leaks are not part of the County's MS4 load reductions. Loadings from SSOs and other sewer leaks are reflected in water quality monitoring data. These data were used in TMDL development, meaning that loads from SSOs and other sewer leaks are assumed to contribute to the overall load from urban areas (e.g., the County's MS4 area). The WSSC program is mentioned here as part of the overall plan to help the Anacostia River meet its water quality criteria. The correction of SSOs and other sewer leaks will help the overall achievability of the nutrient, BOD, and bacteria TMDLs.

### 6.2 Cost Estimates

The cost estimates in this section are intended to provide the County and its watershed partners with a general sense of the expenditures and staff resources, within an order of magnitude

accuracy, that might be anticipated over the period of implementation. The costs do not account for inflation over the lifetime of this plan. Given the iterative and adaptive nature of the restoration plan and the potential for modifications of proposed activities, the cost estimate should be considered preliminary for the year estimated and in later years should be revisited as the implementation period moves forward and new data become available.

# 6.2.1 Programmatic Initiatives

Cost for programmatic initiatives are more difficult to determine than BMP costs. Some of the programmatic initiatives are extensions of current County practices. For instance, the ReLeaf Grant Program is one of the County's existing programs with an existing budget. For the CWP, the costs are included in the BMP analysis; the only additional cost to the County is the staff time needed to administer and coordinate the program as part of regular duties. Other programs do not have costs factored into the current County budget.

Provided below are the estimated resources needed for various outreach-related programmatic initiatives that support watershed restoration. Resources will be prorated and split among the different local TMDL restoration plans. Many of the existing County programs are expected to be maintained at their current levels. Some programs are still in the initial phases, so the programmatic costs for those activities will increase. Only County programs that will have increased programmatic funding are discussed in this section. The County programs that are not addressed below include those for which any increase in programmatic costs is only due to annual salary increases, not because of an increase in activity level.

#### Current Outreach Initiatives

- Clean Water Partnership (CWP) Program: As discussed in section 4.2.1, the CWP, which focuses on ROW runoff management, will have a total cost of approximately \$64 million (\$14 million for the first year followed by \$25 million for each of the following 2 years). The program operating costs for this program will include three staff engineers for 100 percent of their time.
- Rain Check Rebate and Grant Program: As discussed in section 6.1.2, the County has allocated \$3 million to implement the Rain Check Rebate and Grant Program. Funding comes entirely from the revenues generated under the Clean Water Act Fee Program. In addition to the costs for the rebates themselves and County staff time needed to run the program, it is anticipated that the County will need to continually reach out to the public to promote the program and encourage participation. This will primarily be done though community workshops. This program costs the County \$300,000 annually in administration.
- Alternative Compliance Program: There is opportunity for DoE staff working on this program to cross-market outreach with other related programs such as the Rain Check Rebate and Grant Program and other County programs. The County plans to use two full-time County staff members to reach out and work with 100 nonprofit organizations each year. The County staff will contact prospective nonprofit organization partners and track the program's progress.
- New Outreach Initiatives

- Pet Waste Program: An effort is currently underway to develop a pet waste outreach campaign. However, because campaign strategy is not yet developed, costs for this program can only be preliminarily estimated. The County estimates it will provide \$50,000 in the first year of the pet waste campaign towards costs for installation of pet waste stations, and for County staff to operate this program. The current strategy is to target this program to homeowner associations (HOAs) only. The HOAs will be responsible for day-to-day upkeep of the stations. Bag dispenser stations generally range from \$120 to \$500, plus installation costs. The County will also look for partners to support installation or provide other assistance to help reduce the costs of this program. The operating costs for this program will include one staff member for 25 percent of their time.
- Household and Commercial Waste Disposal Program: The County will initiate a public outreach program to educate the public on pollution from leaking dumpsters and trash bins in addition to encouraging the use of leakproof containers. The outreach campaign will also emphasize ways to prevent washwater from entering the County's MS4. The costs associated with this program will include County staff and public education materials. The program operating costs for this program will include one staff member for 5 percent of their time.

Each program has annual operational costs that include staff salaries, outreach materials, and publicity for the program. In addition, the new programs have kick-off year costs for designing the outreach program and its materials. Table 6-5 provides the estimated annual costs for the expanded or new programs, estimated additional costs for the initial year, and the method by which the costs will be prorated among the watersheds.

Table 6-5. Programmatic costs for the Piscataway Creek watershed

Program	Prorating Method	Countywide: Annual Cost	Watershed Share: Annual Cost	Countywide: Additional Initial Year Cost	Watershed Share: Additional Initial Year Cost
CWP	Total cost prorated by impervious acres of the ROW that will be treated.	\$360,000	\$39,307	\$0	\$0
Rain Check Rebate and Grant Program	Total cost prorated by impervious acres of the residential areas that will be treated.	\$300,000	\$15,016	\$0	\$0
Alternative Compliance Program	Total cost prorated by impervious acres of the institutional areas that will be treated.	\$225,000	\$17,877	\$0	\$0
Pet Waste Program	Total cost prorated by the approximate number of pets in the watershed.	\$35,000	\$9,963	\$75,000	\$21,350
Household and Commercial Waste Disposal Program	Total cost prorated by the approximate number of dumpsters in the watershed.	\$35,000	\$0	\$25,000	\$0
Total		\$6,000	\$1,707	\$15,000	\$4,267

Note: This table does not include costs to implement BMPs. Costs are for staff and outreach materials and publicity.

## 6.2.2 BMP Implementation

The cost data presented in Table 6-6 are based on the University of Maryland Center for Environmental Science (UMCES) Technical Report Series No. TS-626-11, *Costs of Stormwater Management Practices in Maryland Counties*, prepared for MDE (King and Hagan 2011).<sup>5</sup> These unit cost estimates (capital and operations and maintenance [O&M]) were developed for the proposed BMPs presented in section 6.1 by land use type.

Table 6-6. BMPs costs by application

BMP Type	Life Span (years)	Preconstruction & Construction Cost/Impervious Acre	O&M Unit Cost/ Impervious Acre	Total Life Costs	Annualized Cost/ Impervious Acre
Pond retrofit	20	\$11,700	\$1,232	\$36,340	\$1,817
ROW: open section	20	\$52,758	\$984	\$72,240	\$3,622
ROW: closed section	20	\$55,929	\$2,379	\$90,213	\$5,175
Institutional	20	\$51,368	\$1,386	\$100,949	\$3,954
Commercial/industrial	20	\$51,368	\$1,386	\$100,949	\$3,954
Residential	20	\$17,477	\$309	\$23,665	\$1,183
Stream restoration	20	\$50,000	\$891	\$67,820	\$3,391

<sup>&</sup>lt;sup>5</sup> The cost-estimating framework used in the report develops full life cycle cost estimates using the sum of initial project costs (pre-construction, construction and land costs) funded by a 20-year county bond issued at 3 percent, plus total annual and intermittent maintenance costs over 20 years. Annualized life cycle costs are estimated as the annual bond payment required to finance the initial cost of the BMP (20-year bond at 3 percent) plus average annual routine and intermittent maintenance costs.

Stream restoration costs were taken directly from the King and Hagan (2011) report. The remaining BMP group type costs are averages of different specific BMP types. The following is a discussion on the methods used to determine the BMP type costs presented in Table 6-6.

- *Pond Retrofit Costs*. The UMCES cost data provides information for new dry pond construction, but not for retrofitting a dry pond to improve water quality. Pond retrofits would focus on retrofitting dry ponds to wet ponds. For the pond retrofit cost, it was assumed to be equivalent to 30 percent of the cost of a new pond construction.
- ROW: Open Section. As previously described, a number of ESD practices can be used on an open section ROW. These were ranked from the lowest cost (impervious disconnection) to the highest cost (permeable pavement). Because this restoration plan does not specify which ESD practices will be used, the final costs were weighted according to an estimated proportion for each practice to arrive at the final cost. There are 1,266 acres of open road section in the County. Based on professional judgment and experience in the County and the State, of that total acreage, 20 percent was assumed to qualify for impervious disconnect credit, 30 percent could be treated with swales or bioswales, 40 percent could be treated with vegetated open channels, and 10 percent would require a permeable pavement practice. Because the UMCES report does not have any values for impervious disconnection, the urban grass filter cost was used as a surrogate. This generated a weighted annualized unit cost of \$3,622/impervious acre.
- ROW: Closed Section. A similar analysis was conducted for the closed ROW section. The ranking of potential ESD practices ranged from the lowest (tree box) to the highest (permeable pavement). The lowest cost ESD practice, the tree box, will generally not meet the performance criteria as a stand-alone practice, but will need to be coupled with other practices, such as bioretention/rain garden practices. Based on professional judgment and experience in the County and the State, it was projected that this combination of practices could manage 40 percent of closed ROW acres and that another 40 percent might require a hydrodynamic device or a similar practice. In addition, it was projected that approximately 15 percent of the areas would require an urban filter, and 5 percent would require a permeable pavement solution. This generated a weighted annualized unit cost of \$5,175/impervious acre.
- Institutional. The institutional land-use applications were subject to a similar analysis. As previously described, the institutional land-use applications have a much larger grouping of ESD practice options. The ranking by cost was the same as for open ROW section. The institutional applications also usually have more space available for stormwater practices. In addition, roof areas could be treated using impervious area disconnection coupled with storage devices such as dry wells, landscape planters, or rain gardens. This accounts for 30 percent of the total institutional impervious area. Based on professional judgment and experience in the County and the State, another 45 percent could be treated with landscape-based practices, such as bioretention. In addition, urban filtering practices might make up 20 percent and another 5 percent could require the use of permeable pavement in parking areas. This generated a weighted annualized unit cost of \$3,954/impervious acre.
- *Industrial/Commercial*. The analysis of industrial and commercial applications revealed that these have opportunities similar to the institutional land uses; therefore, the same

unit costs developed for the institutional areas apply to industrial and commercial land areas.

■ Residential. The residential land use has a well-defined range of on-site BMP practices that can be used to manage stormwater. They include all the nonstructural practices documented in the MDE ESD manual (MDE 2009), as well as swales, rain gardens, and permeable pavement for driveways, walks, and patios. Based on professional judgment and experience in the County and the State, it was estimated that practices in the following percentages could be used;

-	Rooftop disconnection	25%
-	Nonrooftop disconnection	10%
-	Bioswales	20%
-	Rain gardens	40%
-	Permeable pavement	5%

This generated a weighted annualized unit cost of \$1,183/impervious acre for residential applications. However, since the amount of impervious cover for various residential types ranges from 3,000 square feet for 1-acre lots to 1,500 square feet for ½-acre lots, the following preconstruction and construction and annualized unit costs for the various lot sizes were obtained and used in this cost analysis:

-	Lot Size	Pre-construction & Construction Costs	Annualized Unit Cost
-	1 acre	\$ 1,165	\$ 79
-	½ acre	\$ 794	\$ 54
-	<sup>1</sup> / <sub>3</sub> acre	\$ 728	\$ 49
-	½ acre	\$ 728	\$ 49
-	½ acre	\$ 603	\$ 41

■ *Life Cycle*. Although individual life cycles can range from 10 to 50 years, the lifetime of on-the-ground BMPs is generally considered to be about 20 years. This period is also reasonable for programmatic strategies because significant changes can occur to a program or practice over its 20-year life span.

Cost estimates for each subwatershed were developed using the selected palette of on-the-ground BMP and programmatic strategies, targeted based on land use types. Cost estimates of on-the-ground BMPs could include costs related to land acquisition, scaled construction, design and permitting, and operation and long-term maintenance. Cost estimates have been established using published Maryland data (in MAST) and local project knowledge to develop County-specific implementation costs. The MAST unit costs (\$ per impervious acre treated) were used to develop restoration costs.

#### 6.2.3 Final Costs

The final costs per restoration activity are shown in Table 6-7, along with the estimated load reductions and cost per pound billions of organisms of bacteria reduced. Pet waste campaigns

account for the largest percent of reductions followed by ESD practices, where most of the reductions are from ESD practices on ROWs.

Table 6-7. Total BMP implementation and programmatic initiatives cost and fecal coliform bacteria load reductions by the restoration strategy

Parameter	Dry Pond Retrofit	ESD Practices	Pet Waste Campaign	Dumpster and Washing Program
Tinkers Creek				
Total cost (\$M)	\$0.031	\$20.82	\$0.012	\$0.002
FCB Reduction (MPN B/yr)	1,321	92,923	136,990	24,609
FCB Reduction Cost (\$/MPN B/yr)	\$24	\$224	\$0.09	\$0.1
Main Stem				
Total cost (\$M)	\$0.28	\$17.66	\$0.016	\$0.003
FCB Reduction (MPN B/yr)	5,552	158,599	166,851	30,023
FCB Reduction Cost (\$/MPN B/yr)	\$51	\$111	\$0.11	\$0.12

# 6.3 Funding Sources

Implementation of the management activities within the proposed schedule will depend largely on available funding and financing options. Funding refers to sources of revenues to pay for annual operating expenditures, including maintenance and administrative costs; to pay for management activities directly out of current revenues; and to repay debt issued to finance capital improvements. Financing is defined as the initial source of funds to pay for management activities. A comprehensive list of available funding and financing options were reviewed, and the most applicable approaches are summarized in this section.

The County is considering a number of different ways to finance its restoration projects. Typically, the County is issued a tax-free bond. The County can use private financing in a couple of different ways and can use group financing. Another option that the County might consider is selling stormwater bonds, where the residents can buy bonds and be invested in the program. Although a good option, establishing and administering stormwater bond sales is a time-intensive process and could be cost-prohibitive as a result.

Currently, the County is funding projects through its annual Capital Improvements Program (CIP), which is supported primarily through the sale of bonds. The CIP contains project construction budget projections for the next 6 years. Depending on the project commitments in the CIP, the County purchases bonds to match CIP cost demands. In addition, the stormwater ad valorem tax is collected throughout the County (except for Bowie, which is its own entity) as part of property taxes to help fund stormwater management programs. The tax is applied in two taxing districts: (1) District 1 generally covers the urban portions of the County and has a tax rate of \$0.054 per \$100 of assessed property value, and (2) District 2 generally covers the rural portions of the County and has a tax rate of \$0.012 per \$100 of assessed property value. The County uses these funds to predict the amount of annual CIP expenditures using the generated funds. The ad valorem tax annually collects approximately \$7 million; however, that total varies year to year on the basis of assessed property values. Not all of this money is available for stormwater restoration projects. Some of the collected funds are used to support the Department of Permitting, Inspection, and

Enforcement; DPW&T's gray infrastructure projects (infrastructure for stormwater conveyance), and salaries for DoE staff.

In 2013, the County enacted a Clean Water Act Fee that provides a dedicated revenue source for addressing stormwater runoff and improving water quality for regulatory mandates such as the Chesapeake Bay WIP, TMDL Restoration Plans, and the NPDES MS4 Permit (independent of the ad valorem tax and General Fund). The fee is based on a property's assessed impervious surface coverage and provides a mechanism to equitably allocate the fee based on a property's stormwater contribution. Thus, each property contributes a fair and equitable share toward the overall cost of improving water quality and mitigating the impact of stormwater runoff. The fee is expected to collect roughly \$14 million of dedicated funding annually. Depending on the rate of restoration activities completed by the CWP and County CIP efforts, the County might reevaluate funding options in the future.

Table 6-8 presents the current CIP budgets for stormwater-related treatment projects countywide. Although the CIP lists some specific projects, many listings are for general restoration activities and do not list specific restoration activity locations; therefore, the CIP expenditures for the entire County, rather than watershed-specific activities, are listed. Some additional funds are dedicated but are not listed in the CIP. The largest of these is the CWP, which will be run by DoE. The program is expected to be responsible for providing water quality treatment to 2,000 acres of impervious land over the next 3 years at a total cost of approximately \$64 million (\$14 million in the first year, followed by \$25 million in each of the following 2 years).

Table 6-8. Current capital improvement project (CIP) budget for Prince George's County

	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
Project Type			Allo	cated Cost	(\$1,000s)		
Local TMDL restoration activities	0	650	1,000	1,700	1,700	1,700	1,700
NPDES compliance	3,398	8,287	8,230	6,670	6,670	6,670	2,170
Chesapeake Bay WIP-related water quality	1,453	6,728	0	0	0	0	0
DPW&T stormwater management	16,996	10,250	12,010	13,160	14,260	14,260	14,260
Stream restoration	2,481	1,650	1,000	0	0	0	0
Other identified project	2,550	2,415	3,190	490	0	0	0
Contingency fund	1,000	1,000	1,000	1,000	1,000	1,000	0
Total	27,878	30,980	26,430	23,020	23,630	23,630	18,130
Project Type			Fund	ed by Grants	s (\$1,000s)		
NPDES compliance and restoration (including WIP)	12,122	26,185	18,810	.15,070	14,770	14,770	14,770
DPW&T stormwater management	23,000	14,800	16,000	17,000	17,000	17,000	17,000
Stream restoration	2,150	1,800	175	4,600	2,100	2,100	010,100
Contingency fund	1,000	1,000	1,000	1,000	1,000	1,000	1,000
Total	24,000	15,800	17,175	22,600	20,100	34,870	42,870

Note: FY = fiscal year, which runs July through June. For example, fiscal year 2014 ran July 1, 2013 through June 30, 2014.

Besides funds from the Clean Water Act Fee, stormwater ad valorem tax, and CIP budget, grants (federal, state, or other) are expected to be an essential contribution to funding; a list is provided in Appendix D. The County has successfully obtained various grants in the past and expects that the trend will continue. The County will continue to aggressively pursue grant opportunities available for restoration projects. In addition to grants, federal and state loans (e.g., state revolving fund) might be an option for helping to fund part of the TMDL restoration process. In addition, the County encourages government entities (e.g., municipalities) and private organizations (e.g., watershed groups, nonprofits) to identify and apply for grant opportunities.

It is expected that the current funding sources and funding will remain consistent over the life of this restoration plan. Projecting the current and projected 5-year capital budget (2014–2019), the County expects to have \$21 million a year from the Clean Water Act fees and ad valorem tax (or \$105 million total over the 5-year period) for restoration activities. The County will sell bonds as needed and will use revenues to pay the interest. The available money will need to be split across multiple restoration plans, including the Chesapeake Bay WIP; however, many of the activities in the WIP can be counted towards the local restoration plans. Similarly, the PCB-impacted water body restoration plan has restoration activities that overlap with the Anacostia River, Mattawoman Creek, and Piscataway Creek restoration plans. The MS4-responsible budgetary requirements of the different restoration plans are:

Anacostia River watershed: \$401 million
 Piscataway Creek watershed: \$39 million
 Mattawoman Creek watershed: \$14 million
 Upper Patuxent River watershed: \$4 million
 Rocky Gorge Reservoir watershed: \$0.2 million

PCB-Impaired water bodies:
 Chesapeake Bay WIP (countywide):
 \$69 million (Potomac River portion only)
 \$727 million (for comparison to local plans)

For the purposes of this plan, funding by the County can be allocated proportionally to the funding required by each restoration plan. The County reserves the right to shift funding, in certain years, to areas in other watersheds that require large amounts of load reductions or where restoration opportunities arise. By doing so, the County will shift year-to-year reduction goals, but will not change the final restoration activity completion date, which was determined using the estimated annual budget for restoration activities.

# 6.4 Implementation Schedule

This section provides the implementation schedule for the BMP and programmatic strategy necessary to meet the TMDL compliance milestones. The timeframe to secure the necessary funding for each individual BMP is not incorporated in the implementation schedule. There is no mandated end date to the local TMDL restoration plans; however, the County understands that the public prefers an expedited restoration process. The County also shares the urgency. However, the lack of new BMPs with better efficiencies and site opportunities for restoration activities that can

<sup>&</sup>lt;sup>6</sup> For more information on the PCB-impacted water body restoration plan, please see *Restoration Plan for PCB-Impacted Water Bodies in Prince George's County* (Tetra Tech 2015a).

occur each year might be limited. Regardless, the County and its watershed partners are committed to finding site opportunities and to expediting the planning, design, and construction phases for management activity to the maximum extent practicable.

Several factors contribute to the overall schedule. First, the County is bound by its permit requirements to retrofit (e.g., treat) 20 percent of the untreated impervious area in its MS4 area by the end of the permit cycle (current permit ends on January 2, 2019). Another factor in the implementation schedule is the Phase II WIP for the Chesapeake Bay TMDL. In addition, the County has initiated the CWP, which is initially focusing on ROW runoff management for older communities, which are inside the Capital Beltway. The program is expected to be responsible for providing water quality treatment to 2,000 acres of impervious land over the next 3 years. The County also anticipates restoring an additional 2,000 acres through its CIP and other efforts. These will form the basis of the main interim milestones of this restoration plan.

Planning for public education and outreach campaigns will begin when this restoration plan is finalized. To be successful, the campaigns will need to be ongoing and not be one-time activities. The County is already launching a pet waste campaign. Pet waste campaigns will initially focus on the areas with the highest concentrations of pets. Similarly, good lawn care education will begin in areas with the most residential turf. The County will aim to target its entire area by the end of its current permit cycle.

Another major factor in the implementation schedule is the availability of funding. From Table 6-8, the annual countywide planned water quality improvement expenditures range from \$18 million to \$31 million. However, these funds will be spread across watersheds because the County is responsible for implementing the Chesapeake Bay WIP and the restoration plans for the Anacostia River, Piscataway Creek, Mattawoman Creek, Rocky Gorge Reservoir, Upper Patuxent River, and PCB-impacted watersheds. Therefore, the annual projected impervious acres that will be treated will be spread throughout the County.

To help determine the schedule, the total required impervious acres to be treated were totaled for all the local restoration plans. The percent total area for each restoration plan was then calculated (Table 6-9) so that implementation would be proportionally done on the basis of required impervious area retrofits. The County estimates, that on average, 1,000 impervious acres per year will be treated (after an initial ramp up period); therefore, these annual acres will be split between the different TMDL watersheds. However, the County reserves the right to prioritize specific watersheds to address areas with higher load reduction requirements first. For instance, the CWP will be focusing on the older areas of the County; since they were developed before stormwater management controls were enacted. As a result, the percentages in Table 6-9 were adjusted for the initial years and the remaining years were then proportioned on the basis of remaining impervious areas to be treated (Table 6-10).

Factoring the implementation of the other restoration plans, this restoration plan will be fully implemented by FY2030. The impervious acres identified in this plan will have been treated with BMPs and all programmatic activities will have been implemented by FY2030. Table 6-12 presents the estimated annual goals (milestones) for impervious area treated. While, the County estimates it will annually treat 1,000 impervious acres (after an initial ramp up period), there will be slight fluctuations in the annual amount with the annual average of 1,000 impervious acres. The

County will aim to exceed the annual average so that restoration efforts can be completed prior to FY2030.

Table 6-11 presents the average annual estimated load reductions by year from BMP implementation. There will be slight fluctuations in the annual load reductions due to the types of BMPs used and the land uses they treat, but the County will aim to meet or exceed the annual goals.

Table 6-12 presents the overall target milestone timeline for this restoration effort. This schedule will be continuously monitored by the County to access ways to increase the rate of implementation and to ensure practices are occurring as planned.

Table 6-9. Impervious area goals to be treated by local restoration plan

	Anacostia River	Mattawoman Creek	Patuxent River	Piscataway Creek	Rocky Gorge Reservoir	PCB Watersheds <sup>a</sup>	Total
Impervious area to be treated in MS4 areas	10,129	388	140	1,000	4	2,027	13,688
Percent of total impervious (connected and disconnected) in MS4 areas	74.0%	2.8%	1.0%	7.3%	0.0%	14.8%	100%

<sup>&</sup>lt;sup>a</sup> Because the PCB watersheds overlap with several other watersheds, the acres in this table only includes impervious areas that are not in the other watersheds.

Table 6-10. Annual impervious area (acres) goals/milestones to be treated by local restoration plans

Fiscal Year	Annual Impervious Acres	Anacostia River	Mattawoman Creek	Upper Patuxent River	Piscataway Creek	Rocky Gorge Reservoir	PCB Watersheds <sup>a</sup>	Cost (\$M)
2016	750	562.5	20.4	7.3	52.7	0.2	106.8	\$28.99
2017	850	637.5	23.2	8.4	59.7	0.3	121.0	\$32.85
2018	950	712.5	25.9	9.3	66.7	0.3	135.3	\$36.72
2019	1,000	737.7	28.6	10.3	73.7	0.3	149.3	\$38.60
2020	1,000	737.7	28.6	10.3	73.7	0.3	149.3	\$38.60
2021	1,000	737.7	28.6	10.3	73.7	0.3	149.3	\$38.60
2022	1,000	737.7	28.6	10.3	73.7	0.3	149.3	\$38.60
2023	1,000	737.7	28.6	10.3	73.7	0.3	149.3	\$38.60
2024	1,000	737.7	28.6	10.3	73.7	0.3	149.3	\$38.60
2025	1,000	737.7	28.6	10.3	73.7	0.3	149.3	\$38.60
2026	1,000	737.7	28.6	10.3	73.7	0.3	149.3	\$38.60
2027	1,000	737.7	28.6	10.3	73.7	0.3	149.3	\$38.60
2028	950	700.8	27.2	10.3	70.0	0.3	141.9	\$36.67
2029	800	590.2	22.9	8.3	58.9	0.3	119.5	\$30.88
2030	388	286.2	11.1	4.0	28.6	0.1	58.0	\$14.98
Total	13,688	10,129	387.9	140	1,000	4.3	2,027	\$528.50

Note:

<sup>&</sup>lt;sup>a</sup> Because the PCB watersheds overlap with several other watersheds, the acres in this table only includes impervious areas that are not in the other watersheds.

Table 6-11. Estimated annual load reductions from BMP implementation

	Fecal Coliform Bacteria (MPN B/year)					
Fiscal Year	Main Stem	Tinkers Creek	Total			
2015	9,116	5,234	14,349			
2016	10,331	5,931	16,262			
2017	11,546	6,629	18,176			
2018	11,955	6,864	18,819			
2019	11,955	6,864	18,819			
2020	11,955	6,864	18,819			
2021	11,955	6,864	18,819			
2022	11,955	6,864	18,819			
2023	11,955	6,864	18,819			
2024	11,955	6,864	18,819			
2025	11,955	6,864	18,819			
2026	11,955	6,864	18,819			
2027	11,357	6,521	17,878			
2028	9,564	5,491	15,055			
2029	4,639	2,663	7,302			
2030	9,116	5,234	14,349			
Total	164,150	94,244	258,394			

Note:

This table does not include annual projected load reductions from programmatic activities.

Table 6-12. Countywide target timeline for local TMDL restoration plans

Table 6-12. Countywide targ	get ti	mem	ie ioi	IOCa	11 1111	DL IE	Stor	ation	pian	S					
	FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022	FY2023	FY2024	FY2025	FY2026	FY2027	FY2028	FY2029	FY2030
Target	<u> </u>	E	E	E	E	E	E	E	E	E	E	E	E	E	E
Public Outreach															
Increase public outreach for Rain Check Rebates, Alternative Compliance, and other programs. (Continuous outreach that rotates throughout the County)	✓	✓													
Establish public outreach campaigns for pet waste and lawn care	✓	✓													
Public outreach (e.g., campaigns for pet waste and lawn care, education and outreach on Alternative Compliance and Rain Check Rebates)		<b>√</b>	<b>√</b>	<b>√</b>	<b>√</b>	✓	<b>√</b>	<b>√</b>	<b>✓</b>	<b>√</b>	<b>√</b>	<b>✓</b>	<b>✓</b>	<b>√</b>	<b>√</b>
Measure progress/reevaluate public outreach campaigns		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
BMP Implementation															
BMP planning and design	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
BMP implementation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
NPDES MS4 Permit															
MS4 requirement: 20% of untreated impervious cover	✓	✓	✓	✓	✓										
Projected MS4 requirement: 20% of untreated impervious cover						✓	✓	✓	✓	✓					
Monitoring															
Complete Round 3 of the countywide biological monitoring.	✓	✓	✓			✓	✓	✓			✓	✓	✓		
Complete selection of water quality representative chemical monitoring station in Anacostia watershed	<b>✓</b>														
Results of representative chemical monitoring in Anacostia watershed		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Tracking and Reporting															
Update County geodatabase with new BMP, programmatic, and monitoring information	<b>✓</b>	<b>✓</b>	<b>✓</b>	<b>√</b>	<b>✓</b>	<b>√</b>	<b>✓</b>	<b>✓</b>	<b>√</b>	<b>✓</b>	<b>✓</b>	<b>✓</b>	<b>✓</b>	<b>√</b>	<b>√</b>
MS4 Annual Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

#### 6.5 Technical Assistance

Overall success of the restoration will depend on the concerted effort of the County as well as many regional agencies, municipalities, community leaders, and local landowners. Each watershed partner (e.g., federal, state, and local governments, nonprofits, business owners, and private landowners) has its own important role to play in the restoration process. The proposed management actions will require significant time and resources on behalf of all of these organizations. Technical and other in-kind assistance from the watershed partners and the public will be an important component of the plan implementation. Technical assistance will be especially important for addressing impediments to implementation, including permitting challenges, technological limitations, lack of available BMP and ESD sites, and poor public compliance with pet waste and lawn care campaigns. In addition, new BMP technologies are being developed that will help lower costs, decrease the BMP footprint, and increase removal efficiencies. Some of this research is being performed by Dr. Allen Davis at the University of Maryland. These technologies need to be approved and assigned removal efficiencies by MDE and the CBP in a timely manner. In addition to approving new BMP technologies, the County looks to MDE to continue issuing grants for stormwater restoration activities and to help in performing water quality monitoring in high-priority watersheds in the County.

Many sites that are suitable for BMP implementation are not County-owned. Without forming partnerships and being granted access, the County will only be able to install BMPs on property it has direct access to, such as ROW or on County government-owned land. The County will need to seek partnerships with other organizations (e.g., nonprofit organizations, businesses) to perform restoration on private lands. For example, a shopping center owner could partner with the County to gain assistance with installing BMPs. This could range from technical assistance to partnering to install a BMP that treats the parking area of the shopping center and the County ROW. In addition to County-owned and private land, some federal and state properties are available within the County. These state and federal agencies have their own load reductions they will need to meet. The County will explore ways to work with state and federal agencies to conduct joint restoration activities that will help reduce loadings from both County land and either state or federal land.

The County will involve the public in the restoration process (section 6.6). The County welcomes and appreciates any ideas the public can provide; after all, people who live and work in the watersheds are the most familiar with it. They can act as the eyes and ears of the County on a day-to-day basis. During the implementation of the restoration plans, the County will work closely with community leaders to ensure that they participate in the selection of projects to improve water quality in their communities. The County will look into having regular meetings with interested parties. The meetings will be used to obtain feedback on the restoration strategies as well as information on restoration opportunities. The public can further stay informed on the County's progress through the County's annual MS4 report to MDE. This report will be posted on the County's website and will contain information on BMP implementation, public outreach events, and other County programs that will help meet TMDL goals. In addition, the County welcomes public ideas on restoration activities, as well as potential BMP types or locations. The BMPs identified by the Anacostia Watershed Restoration Partnership are in the restoration toolbox of potential restoration activities and thus, they will be considered for implementation on a case-by-case basis as the restoration process moves into the implementation phase.

Besides staying informed, the public has a very important role to play in the restoration process. Homeowners could take pledges to clean up after pets and practice environmentally friendly lawn care. In addition, the public can participate in the Rain Check Rebate and Grant Program and nonprofits can participate in the Alternative Compliance Program. Nonprofit organizations and private landowners can aid in the restoration process by installing BMPs (e.g., rain barrels, rain gardens, permeable pavement) on their properties and following recommendations on pet waste and lawn care to help minimize their impact to the overall pollution loading to the County's water bodies. Installing BMPs on private properties decreases the owners Clean Water Act fee. Although these small practices might seem insignificant, the overall load reductions can be significant if enough nonprofit organizations and private landowners aid in the restoration process. Business owners can help by promoting pet waste campaigns. For example, pet stores could donate pet waste bag dispensers to apartment complexes (in exchange for advertising rights on the pet waste stations); pet stores, kennels, pet rescue leagues, and veterinarians could allow public outreach brochures and signage at businesses; or veterinarians could speak to pet owners about the importance of pet waste cleanup and spaying or neutering pets. Similarly, lawn care companies and suppliers could aid in public outreach regarding lawn care. Organizations such as homeowners associations, neighborhood associations, and business organizations can also help by promoting the programmatic initiatives outlined in this restoration plan.

The County has already initiated several projects, including:

- Engagement and Collaboration with Civic and Homeowner Associations. DoE will continue to reach out to local civic and HOAs through presentations and other outreach tactics. For example, DoE recently conducted several environmentally focused presentations for civic associations that focused on the Rain Check Rebate and Grant Program. In addition, presentations at local libraries in targeted communities are also fostering participation in these programs by homeowners. HOAs are an important part of the process and the County is committed to engaging them. The County has an agreement with the Chesapeake Bay Trust to provide grants and to work with HOAs to figure out their needs and the programs that would directly benefit them.
- Stormwater Stewardship Grant Program. To reduce stormwater pollution from residential areas, particularly urban and suburban areas, it will be critical that DoE find ways to build partnerships and collaborate more with HOAs. Through the Prince George's County Stormwater Stewardship Grant Program, the Chesapeake Bay Trust currently funds implementation requests for construction of water quality improvement projects. The Trust also funds citizen engagement and behavior change projects implemented by a variety of nonprofit groups, including HOAs. Grants ranging from \$20,000 to \$200,000 are available for water quality projects; grants from \$5,000 to \$50,000 are available for citizen engagement and behavior change projects. Projects must accomplish on-the-ground restoration that will result in improvements in water quality and watershed health (reduction in loads of nutrients or sediment) or significantly engage members of the public in stormwater issues by promoting awareness and behavioral change. Another goal of the grant program is to encourage participation by multicultural communities on projects that improve watershed health and expand ecological awareness.
- Technical Assistance for the Alternative Compliance Program. The County's Alternative Compliance Program allows qualified tax-exempt religious organizations or other 501(c) nonprofit organizations to qualify for a reduction in the Impervious Area Fee portion of the

Clean Water Act Fee for the property owned by the organization. There are three options that the organizations can use to receive the fee reduction:

- Provide Easements. For a 50 percent reduction in the fee. the property owner provides a temporary right-of-entry agreement to the County to install BMPs on property owned by the organization. To continue receiving the impervious area fee credit. installed BMPs must be maintained by the property owner of record and are subject to inspection by the DoE. DoE is conducting three pilot studies at places of worship.
- Outreach and Education.
  For a 25 percent reduction in the fee, the property owner agrees to take part in the County's outreach and education campaign to encourage other property owners to participate in the County's Rain Check Rebate and Grant Program for

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restoration. The property owner also agrees to create an environmental green team or ministry. Some examples of activities that an environmental green team or ministry could perform include tree planting, trash pickup, on-site recycling and better waste management, rain garden planting, and good housekeeping efforts to maintain clean lots.

Green Care and Good Housekeeping. For a 25 percent reduction in the fee, the property owner agrees to use lawn management companies that are certified in the proper use and application of fertilizers in connection with their green areas and lawns. The property owner also agrees to conduct good housekeeping practices for ensuring clean lots. This option requires participating organizations to use state-certified landscape services.

At the time of this document's publication, 55 organizations had applied for the Alternate Compliance Program; most expressed interest in participating in all three options. The County is in consultation eight of them to identify suitable BMP opportunities. For each

option, the applicant must sign a memorandum of understanding that explains the agreement with the County.

### 6.6 Public Outreach and Involvement

To both supplement and support the on-the-ground BMPs and cross-agency programmatic efforts, the County will need to have a robust public outreach and involvement program that spans all the divisions within DoE and incorporates activities by other County agencies and departments. Public outreach can increase public awareness of stormwater issues and ultimately change pollution-generating behaviors to pollution-preventing behaviors, promote the voluntary installation of stormwater practices by property owners, and foster partnerships with other local agencies and organizations to maximize pollutant-reduction achievements. Public outreach can also increase support for BMP retrofits, stream restoration projects, and other on-the-ground work. Public involvement in the implementation activities will also help to ensure that the most appropriate BMP locations, amounts, and types are selected to meet project needs and communities' and stakeholders' wishes.

As part of the public outreach and involvement in the restoration planning, the County has set up a website

(http://www.princegeorgescountymd.gov/sites/StormwaterManagement/Services/Streams-Water sheds/Restoration-Planning/Pages/default.aspx) and held public meetings on the restoration process. Two public meetings were held in July 2014 to introduce the restoration planning process and to seek public feedback and suggestions. In addition, the County held a public hearing in November 2015 to present the restoration plans to the public and to receive public comments.

Current outreach programs are discussed in Ssection 4.2, and proposed outreach and education activities are specified in section 6.1.1. Beyond these targeted efforts, the County will work with watershed partners to ensure that the public is informed of implementation progress and that active public involvement is pursued throughout the process.

# 6.6.1 Outreach to Support Implementation Activities

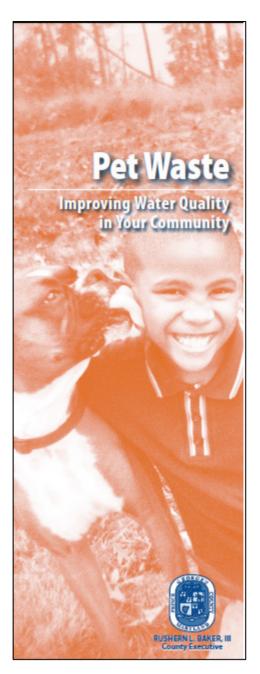
Outreach should specifically target TMDL pollutants and pollutant-generating behaviors, and will be carried out using the following broad methods:

- Target Audience Analysis. The County is made up of a diverse population in terms of age, race, culture, language, education, and income. The County will be looking at different languages and cultures throughout the County trying to learn how those populations best receive information, what events they attend, etc. The County will be focusing on the best way to reach diverse groups with different messaging and methods to make sure that they are getting the message and acting on it.
  - The County will seek ways to conduct research about various target audiences to learn what barriers (perceived or actual) exist that currently prevent more widespread adoption of pollutant-reducing behaviors. Understanding the audience you are trying to reach is invaluable. In addition, information gained from the research will help establish baseline conditions, such as what the public knows or does not know, what the public does or does not do, and, most importantly, what the County might be able to do to encourage change.

Research can be carried out through surveys, interviews, focus groups, and literature reviews. Having a better understanding of what kinds of messages and methods are best for each audience and each pollutant will help ensure that the outreach undertaken has a greater likelihood of success.

Plans are underway to conduct a countywide public survey to learn more about the community's level of environmental awareness and people's concerns. Questions aimed at understanding existing stormwater awareness, behaviors, and obstacles will be included in that survey at a minimum. The types of questions that could be asked in the survey include:

- Do you currently take steps to reduce runoff from your property?
- How often do you fertilize your yard?
- Do you fertilize your yard yourself or do you hire a company to do it?
- How many dogs live in your household?
   How do you dispose of your dog's waste?
- Have you heard about the Rain Check Rebate and Grant Program? If so, how did you hear about it?
- Of the following list of reasons, which is the primary reason you have not taken steps to reduce stormwater runoff?
  - Stormwater runoff is not a problem in my community
  - Too much work
  - Too expensive
  - I don't know what to do
  - Practices are not attractive
  - HOA would not approve
- Inventory Existing County Outreach Programs. The County has initiated the planning for the creation of an inventory of existing programs in and around Prince George's County that are working towards the shared goals of environmental stewardship or stormwater pollution reduction and already have ongoing or planned outreach efforts. The County's inventory will be categorized by mission, geographic coverage, specific focus issue(s), partnership status and potential, mutual benefits, and other elements. This inventory will not only keep the County from duplicating efforts of other groups or agencies, but will



also help identify and fill in any noticeable gaps in issues or geographic coverage of existing programs and partners.

- Develop and Implement Targeted Outreach Components as Part of an Outreach Toolbox. Campaigns and materials that focus specifically on the following topics could be developed:
  - Residential and community stormwater management and implementation (including roof and parking area runoff).
  - Lawn stewardship to reduce runoff and chemical and fertilizer use, address leaves and grass clippings, and explain proper mower heights. This includes outreach to increase participation in the Rain Check Rebate and Grant Program, which will need to be increased significantly.
  - Car washing and car care.
  - Pet waste pickup.
  - Alternative compliance (aimed at following up with places of worship and other nonprofit organizations to promote participation).

Each campaign will include, at a minimum, goals, objectives, target audiences, key messages, delivery techniques, metrics, potential partnerships, and priority neighborhoods. The campaigns will include messages on what citizens should be doing (e.g., using fertilizer only if soil tests dictate a need) and also what they should not be doing (e.g., spilling fertilizer on sideways and driveways). Messages will also emphasize points that show how even small actions can add up to large problems, and, vice versa, to large solutions. A contractor work order to support campaign development is in the planning stage.

■ Enhance and Grow Partnerships. The County's numerous partnerships with groups such as Master Gardeners, Chesapeake Bay Trust, and Metropolitan Washington Council of Governments will continue to be fostered and supported so that outreach efforts piggybacking on the efforts undertaken by these groups can continue to grow. In addition, new partnerships with groups such Anacostia Watershed Society, Potomac Riverkeepers, landscapers and nursery supply chains, HOAs, local boy scout chapters, veterinarians, and others will be developed or fostered to help broaden stormwater outreach and reach citizens that have not been reached in the past.

Although the results of outreach and involvement efforts are very difficult to quantify in terms of pollutant reductions, these activities will make a difference by slowly changing the mindsets and behaviors of County residents over time. In the future, some assumptions about pollutant reductions associated with pet waste pickup, for example, might be developed based on public surveys, observational studies, or other methods. Reductions gained from changes in residential or commercial fertilizer use might be calculated by looking at changes in fertilizer sales across the County.

# 6.6.2 Public Involvement to Support Implementation Activities

The public is an important part of the restoration process and can personally become involved in many ways.

Community organizations and citizens groups can participate in restoration activities in several ways. They can get involved with local nonprofit groups with which the County is currently partnering. The County will be using nonprofits to help find grant opportunities so the non-profits do not have to wait for the County programs. The additional funding will enable quick upgrades or installation of BMPs throughout various municipalities. In addition, groups can help by identifying potential projects and assisting with public outreach on a variety of water quality topics, such as the upcoming litter and pet waste campaigns. Groups can meet with homeowner associations and other civic leaders to relay the messages that will be pushed with the campaigns and participate in community trash pickups or the Rain Check Rebate Program.

This section lists several recommendations that the County could either implement itself or seek community partners to implement to cut down on the demand on the County's resources and staff's limited time.

- Identify and Promote Opportunities for Organizations and Citizens' Groups to Become More Involved in Implementation Efforts. During the public involvement process for the development of this restoration plan, the County heard from several citizens and watersheds groups that are very interested in providing on-the-ground support for BMP implementation projects, programmatic initiatives, or other outreach efforts to support implementation. To this end, the County proposes one of the follow two options:
  - Option 1: A quarterly meeting in which the County invites representatives from watershed groups and local active civic associations for a "Community Collaboration Day." Up to five groups will be invited to each meeting (different groups will be invited to each meeting). At these meetings, the County will provide details on what has been accomplished thus far, what projects they are currently underway, and the County's plans for the next 6 months to a year. Each group in attendance will be asked to give a snapshot of their activities and their plans. Each group will be given the opportunity to have the County's ear privately for 20 minutes to collaborate with County staff and make some preliminary plans for working together. Groups could be provided a 1-page worksheet upon arrival at the meeting to fill out to help make the focused discussion more productive. For example, the Anacostia Watershed Society's Watershed Stewards Academy requires that each student take a 12-session course and then complete a capstone neighborhood project to become a Master Watershed Steward. The County could work with the society to identify priority areas and BMPS for such capstone projects. While each group meets separately with the County, the other groups can meet and discuss how they can work together on various projects.
  - Option 2: A brief email survey developed by the County to send to all local watershed/citizen groups asking them to select specific items on which they need from the County in order to make progress toward stormwater pollution reduction goals. Sample questions are listed below:
    - Check the topics on which your citizen group could use professional advice:
      - BMP siting in a specific community/neighborhood
      - Best practices for stream cleanups

- Technical support for GIS applications
- In addition, the County will identify several different ways in which citizens and organizations can support implementation directly, such as the following:

## **Monitoring**

 Suggest specific locations for biological or water quality monitoring activities to be carried out based on surrounding land uses/changes, historic water quality problems, public desires, etc.

#### **BMP** Installation

- Civic or environmental groups can work directly with an organization or commercial business that has a significant amount of untreated impervious surface such as large parking lots, large building footprint, etc. The groups can help obtain a commitment from the business to participate in the Rain Check Rebate and Grant Program, Alternative Compliance Program, or otherwise install stormwater BMPs on the property. Group members can offer technical assistance and volunteer labor hours to support installation and/or maintenance. The participating civic or environmental group should discuss the selected location and BMP type with the County prior to working with the property owner.
- Citizen groups can seek out and secure commitments from neighborhood/homeowner associations to designate at least one common area such as a park, walking trail, or playground in which to incorporate a stormwater BMP through the Rain Check Rebate and Grant Program or otherwise. Groups can follow up with property owners to ensure that they are following through with plans and, once installed, keeping up with maintenance and publicizing the practices and the Rain Check Rebate and Grant Program to property owners/residents.
- Citizen volunteers can provide technical support for the County's Rain Check Rebate and Grant Program by assisting in visual inspections of residential properties on which BMPs have been installed. Citizen volunteers can be trained to complete the inspection checklist used for the postinstallation site visits. In addition, volunteers can also provide maintenance checkups on a yearly basis.
- Citizens can organize or participate in volunteer tree planting efforts either working with civic associations or schools, or one-on-one with property owners. Grants are available through the County's ReLeaf Grant Program.
- Apply for grants to implement projects under the Chesapeake Bay Trust's Stormwater Stewardship Grant Program.
- Citizens can inform the County about development issues in their area, so that the County can help communities identify and install the best erosion and settlement control BMPs for the areas.

The County welcomes any suggestions from the public regarding potential BMP types or locations. The BMPs identified by the Anacostia Watershed Restoration Partnership are in the restoration toolbox of potential restoration activities and thus, they will be considered for implementation on a

case-by-case basis as the restoration process moves into the implementation phase.

### **Community Outreach**

- Organize storm drain stenciling projects. Work with the County to identify areas to target (e.g., neighbors that lack storm drain stencils or plaques in priority watersheds). The County could provide supplies to support the project.
- Publicize and promote the Rain Check Rebate Program, Tree ReLeaf
   Program, Alternative Compliance Program, pet waste outreach campaign (when developed), and other programs in organization newsletters and by word of mouth at meetings and events.
- Organize/participate in stream cleanup events and litter campaigns, including those supported by the County's Volunteer Neighborhood Cleanup Program or the Alice Ferguson Foundation (AFF). The next planned cleanup event is slated for April 2015. Citizens can become Site Leaders for the cleanup event by contacting Udoma Ohiri at 301-883-5829 or <a href="mailto:ucohiri@co.pg.md.us">ucohiri@co.pg.md.us</a>; or Alfred Titus-Glover at 301-883-7164 or <a href="mailto:ATitus-Glover@co.pg.md.us">ATitus-Glover@co.pg.md.us</a>.
- Volunteer or suggest locations for stormwater audits carried out by the County.
- Form Watershed Action Teams. The County could develop watershed-specific advisory teams to garner support in identifying places for green infrastructure practices and retrofits, review plans, help identify partners and volunteers for monitoring, or conduct other watershed-specific tasks. Such teams would help meet goals related to outreach, implementation, and public involvement.
- Similar to the July 2014 public meetings held in Laurel and Largo to announce the start of the restoration plan development process, the County could hold semiannual meetings after the restoration plans are developed and are being implemented. The meetings would inform interested parties about restoration progress. Members of the community could be tapped to lead the teams. Team leaders would be responsible for activities such as setting up meetings, communicating with members, and taking notes during meetings. These meetings could be held as informal morning *coffee chats* at a local coffee shop, library, or outside at a public park. Meetings could also be held at a BMP installation site to unveil a newly installed BMP and inform the public of implementation progress. Such meetings could be viewed as ribbon-cutting ceremonies, drawing in members of press for more widespread coverage.
- Online Transparent Progress Reporting. Pictures are worth a thousand words. The County could consider developing an infographic, updated quarterly, which provides program statistics such as the number of BMPs installed or retrofitted in a certain period and cumulatively. When citizens click on the infographic they could then be asked if they have a comment or other feedback they would like to provide via email to the County about its progress and results. Progress information could also be provided through County Click (311) and email blasts. In addition, as mentioned in section 7.1, the County is developing a new geo-referenced database for project installation, location, type, etc. This database will

- be online and available for citizen groups to gain a better sense of how best to dovetail on-the-ground efforts.
- Pilot a Neighborhood EcoTeam in East Riverdale/Bladensburg Area (which is one of the TNI communities). The County could identify a well-respected, active community member to spearhead a voluntary stormwater effort that could focus on both on-the-ground BMPs as well as behavioral changes such as reducing fertilizer use or picking up pet waste. This approach has been proven effective by the Livable Neighborhood Water Stewardship Program in Falls Church, Virginia. Volunteer leaders recruited their neighbors to form household EcoTeams to help each other become better water stewards. The teams adopt behaviors such as creating a rain garden and reducing the use of household chemicals. The team aspect provides the motivation to carry out the actions while establishing relationships that help create a livable neighborhood. Studies indicate that such programs are successful in sustaining significant behavior change at the neighborhood level. Once a team is off and running, the team members can serve as messengers and promoters to help spark interest in additional neighborhoods.
- Conduct a Resource Capacity Analysis. The County could analyze what staffing and resources would be needed to implement one or more of the above recommendations. Then, the County could determine which activities are feasible in the short-term, medium-term, and long-term timeframes. Finally, to reduce the burden on County resources while also increasing project ownership at the community level, the County could consider which activities could be supported by existing or new partners.

# 7 TRACKING AND ADAPTIVE MANAGEMENT

Through its permit, the County is required to "[e]valuate and track the implementation of restoration plans through monitoring or modeling to document the progress toward meeting established benchmarks, deadlines, and stormwater WLAs." The County will address this requirement through its annual MS4 report and through additional environmental monitoring. The overall intent of the County is to go beyond simply tracking implementation of this restoration plan; instead, the County will evaluate how well the implemented plans are resulting in improved conditions. The County's monitoring and assessment approach will include three parts, which are further described in this section:

- (1) Implementation tracking will document restoration activities, such as BMP installation or public outreach.
- (2) Biological monitoring will evaluate the effectiveness of the TMDL/watershed restoration in providing the environmental characteristics that allow overall ecological conditions to improve.
- (3) Water chemical monitoring will document how well those techniques are controlling stressors and reducing pollution.

# 7.1 Implementation Tracking

To assess reasonable compliance, the County will need to develop an effective process to track and report load reductions to gauge progress towards meeting overall load-reduction goals. The main way to track and report BMP implementation and programmatic initiatives is through the County's MS4 Annual Report. DoE submits this report yearly to MDE with material collected in partnership with DPW&T and the Department of Permitting, Inspections, and Enforcement. The County's permit specifies the information that is to be included in the annual report, which includes BMP implementation, illicit discharge detection and elimination, trash and litter control measures, public outreach and education initiatives, watershed assessments, and funding. The annual report will continue to be the main tracking and reporting mechanism to MDE.

With the approval of the restoration plans, the County is required to include additional information in the annual report regarding TMDL compliance. With each annual report, the County will report progress towards meeting its MS4 WLAs by describing how it measured the effectiveness of the program. The annual report will include the estimated net change in pollutant load reductions from all completed structural and nonstructural water quality improvement projects and enhanced stormwater management programs. Estimated load reductions will be calculated in a manner that is consistent with the loads used in this restoration plan. The report will also compare load reductions and costs to benchmarks and milestones, revised cost estimates, and plans for increasing implementation or activities if benchmarks and milestones are not being met. Therefore, the County will be able to determine if it is meeting its restoration goals and, if not, adjust its program accordingly.

The annual report is accompanied by supplemental data about BMPs, funding, and water quality. Urban stormwater BMPs are included as part of the annual report in a geo-referenced database that

is submitted to MDE. The database includes details such as the project locations, types of BMPs, drainage area delineation, and acres of impervious surface treated. County staff will update the database as new projects are completed and approved. The annual report also includes a geo-referenced database for all stream restoration and streambank stabilization projects. It includes the location, details, phase, drainage area, and impervious area treated for each project. DPW&T is responsible for tracking street sweeping and inlet cleaning activities. The number of curb miles swept and tons of waste collected through street sweeping are tracked and reported in the MS4 Annual Report. The County also tracks and annually reports the number of inlets cleaned. The annual report also lists the education and outreach activities from the previous year. The County will post its MS4 report and appendices for the public to view after the report is submitted to MDE each year in early January.

The County will track all future restoration activities (including public outreach activities) and will enter location information into the geodatabase for viewing on a map. Currently, some restoration practices (e.g., tree planting) are not included in the geo-referenced database. A geodatabase to track stormwater implementation policy decisions, maintenance responsibilities, watershed location, and types of BMPs will help the County make critical decisions on stormwater controls during a project's concept plan stage. In addition, the County hopes to develop a data center where all of these activities can be reported. While that process could take a couple of years to build and put into operation, once it is completed, this tool will be centralized so that all partners—nonprofits, community organizers, cities, and towns—can report on their progress in installing BMPs, so the County can account for all activities.

# 7.2 Monitoring Approach

DoE recognizes that effective environmental monitoring requires long-term commitment to routine and consistent sampling, measurement, analysis, and reporting. Although some of the monitoring requirements for implementation of these TMDLs originated with MDE, others are the result of the County's interest in providing additional meaningful information to policymakers and the public. Biological indicators will continue to be used to document and communicate ecological conditions at subwatershed and countywide scales (Tetra Tech 2014a). Other types of monitoring will contribute to understanding whether restoration activities are leading to the elimination, reduction, or otherwise effective management of pollutants within the County; helping meet interim restoration plan load reductions; and demonstrating if changes should be made to the County's restoration strategies. All monitoring will be performed in accordance with a quality assurance project plan (including sample collection standard operating procedures) to ensure that the data are of known quality for use in restoration planning. The purpose of the monitoring is to track progress in addressing watershed concerns and improving watershed conditions through restoration plan implementation. The County will evaluate options for the appropriate monitoring program in consultation with MDE. Regardless of the County's monitoring program, the official monitoring for the state's Integrated Report assessments and impairment status will remain MDE's responsibility. MDE conducts cyclic watershed monitoring on a 5-year schedule.

# 7.2.1 Biological Monitoring

Biological condition, as measured by routine sampling and subsequent analyses with the Maryland Department of Natural Resources' benthic index of biotic integrity (B-IBI), reflects cumulative characteristics of stream ecosystem conditions. It is often impossible to understand and isolate the effects of single, individual stressors (i.e., external factors that cause stress to exposed organisms); however, eliminating, reducing, or otherwise managing stressors and their sources will lead to overall healthier streams. 'Cumulative,' in the sense used here, implies a buildup of physical, chemical, and hydrologic stressors in the watershed over time. The biota present in streams reflects those organisms with the capacity for survival and reproduction in the presence of that cumulative stressor load.

Since 1999 the County has been implementing biological monitoring and assessment of streams and watersheds countywide. Sampling at an individual stream location includes benthic macroinvertebrates, physical habitat quality, and *in situ* water quality (pH, conductivity, temperature, and dissolved oxygen). The first round of monitoring (Round 1) was from 1999–2003, and sampled those indicators at each of 257 sites throughout the County (approximately 50–55 sites per year). Round 2 sampling (2010–2013) occurred for the same number of sites distributed throughout the County, but at different individual locations. Site locations were selected for each round using a stratified random process. The variables used to stratify sites were wadeable, nontidal streams, generally first through fourth order based on the Strahler system and 1:100,000 map scale. Distribution of sample locations were more heavily weighted to smaller first and second order streams.

The approach presented here assumes continuation of routine, countywide monitoring of biological condition for wadeable streams into Round 3 and beyond with potentially additional effort being applied to data analyses related to physical habitat characteristics, altered hydrology, and water chemistry. This will not only provide insight into those stressors most likely causing biological degradation, but could also help in identifying sources of stressors where additional BMP or green infrastructure would be beneficial.

The stepwise progression presented below can be applied to any watershed in the County. The County will focus its efforts on areas of rapid BMP implementation through the CWP. Additional and more detailed analyses of conditions and data in individual subwatersheds can help associate stream biological health with implementation of BMPs (and programmatic initiatives) so that the County can adjust its restoration strategy, if needed. The evaluation of changes in biological health is focused on the County's framework of subwatersheds, although for assessments it is possible to group into the broader scales of the major watersheds (Patuxent River [Lower, Middle, and Upper], Anacostia River, Mattawoman Creek, Piscataway Creek, and Potomac/non-Anacostia River, and Western Branch), as well as countywide.

- Step 1. Record percent biological degradation of subwatershed A from the most recent biological assessment report (Round 2 [R2] in Millard et al. [2013]), noting intensity of impairment and known or most probable sources of pollution or other stressors.
- Step 2. Compare percent biological degradation of subwatershed A from subsequent monitoring (Round 3 [R3]) and determine whether there has been positive change/an improvement (A:R2 > A:R3), negative change/further degradation (A:R2 < A:R3), or no change (A:R2 = A:R3). Use 90 percent confidence intervals as provided in biological

assessment reports to document relative significance of changes. This procedure constitutes a trend analysis for assessing changes in biological condition.

Countywide biological monitoring is a routine part of the County's current monitoring strategy and occurs in 3-year cycles, for which funding is in place for 2015–2017. The monitoring is currently part of the County's standard budget expenditures, and countywide costs range from \$175,000 to \$200,000 per year of each cycle. The County plans to continue with its 3-year cycle approach and will have a 2-year gap between cycles until after restoration activities are completed, which is expected to be in 2030. As a result, the last round of biological monitoring should occur in 2035–2037. After that, biological monitoring should occur at 5-year intervals. During the life of this restoration plan, the total cost for countywide biological monitoring and assessment would be between \$2.6 and \$3 million. In addition, the Maryland Department of Natural Resources conducts the Maryland Biological Stream Survey (MBSS) (a qualitative fish survey).

# 7.2.2 Water Quality Monitoring

Measurement and analysis of physicochemical factors will complement the biological monitoring and will help identify those stressors most likely causing degradation. The contaminants of most concern in the County are total nitrogen, total phosphorus, TSS, BOD, fecal coliform bacteria, and PCBs. These data will be collected using MDE-approved methods and laboratories. Both dry-weather and wet-weather water quality monitoring will be conducted.

Monitoring will not be conducted on a specific BMP to assess its load reduction. The proposed BMP types have established pollutant removal efficiencies and only new and innovative BMPs will need to be individually monitored to assess their load reduction capabilities. Instead, water quality monitoring will be conducted at a subwatershed scale at a stream site downstream of restoration practices. Currently, the County does not have the resources to perform water quality monitoring in each subwatershed. If monitoring were to be conducted for each subwatershed, then funding availability for implementing restoration activities would be substantially reduced. For this reason, the subwatersheds with the highest amount of predicted load reductions, and thus with the most potential for restoration practices, will be assigned the highest priority for this monitoring.

The County will request that MDE aid in the monitoring as well as request permission to move its current NPDES monitoring locations in Bear Branch watershed (part of the Upper Patuxent River watershed) to a subwatershed in the Anacostia River watershed. The monitoring will occur downstream of multiple planned restoration activities (e.g., ESD practices, stream restoration, street sweeping, public outreach). The NPDES-required chemical monitoring is currently part of DoE's annual budget. The monitoring currently includes nitrate plus nitrite, total Kjeldahl nitrogen, total phosphorus, BOD, TSS, and *E. coli* bacteria. Although it is desirable to monitor the farthest downstream location in a subwatershed, several factors must be considered, including location of potential restoration activities, site accessibility, presence of stream flow gages, and proximity to prior water quality monitoring stations (which can be advantageous in helping establish long-term trends).

This plan recommends the monitoring of one priority subwatershed. Monitoring at the selected subwatershed should begin within 1 year of finalizing this plan. Field reconnaissance and final

selection of the monitoring location should be completed within 6 months of finalizing the Plan. For any given subwatershed monitoring location, once water quality standards have been met or restoration practices have been in place for 5 years, the County might consider discontinuing monitoring of the chemical water quality for that subwatershed.

Flow measurements are necessary for calculating pollutant loads from water quality sample concentrations. Higher-cost methods entail installing electronic stream stage measuring devices at each location, then generating a stage/discharge rating curve by measuring flow throughout a large storm event. Mid-cost methods entail installing a staff gage on a nearby bridge footing; however, a stage/discharge rating curve would still be needed. Low-cost methods entail manually measuring flow at the time of a grab sample. The best option would be to colocate the water quality station with an existing flow measurement station. Coarse estimates of flow can be developed by comparing stage and drainage area to that of a nearby USGS gaging station. Additionally, if in the future a rating curve is developed for that site, then historical stage and pollutant concentration data can be used to calculate historic pollutant loads without using the high-cost method. These flow options will be considered when selecting a water quality monitoring station.

The County will use the monitoring data to access the overall load reductions from upstream activities in a watershed with a large amount of planned activity. The data will also be reviewed to access trends, for example:

- Was improvement gradual?
- Did loadings significantly decrease in one year?
- What were the practices installed in the previous year and how do they relate to load reductions in the stream?

There is natural variability in stream water quality. Looking into smaller watersheds with less amounts of implementation activities could make it difficult to separate improvements from natural variability. By looking at a watershed with larger scale implementation, the improvements as a direct result of the implementation should be more easily identified. The County can look at the observed load reductions in the stream, compare them to the projected load reductions from WTM, and adjust the restoration strategies, as needed. The adjustments would not only be for the monitored watershed, but also would be applied countywide in the restoration plans. Adjustments could take the form of additional BMPs, using different types of BMPs, or adding more education and outreach.

# 7.3 Adaptive Management Approach

The implementation process represents the BMPs and strategies that will address current restoration needs of the watershed using the best available information. As implementation progresses, the adaptive management strategy will respond and change as part of the iterative adaptive management approach. It will be important for the County, MDE, and watershed partners to work together on this adaptive management approach to ensure successful implementation. In the TMDL document (MDE 2006), MDE recognized that:

As previously stated, water quality standards cannot be attained in the Piscataway Creek subwatersheds, using the MPR scenario. This may occur in subwatersheds where wildlife

is a significant component or in subwatersheds that require very high reductions of fecal bacteria loads to meet water quality standards. In these cases, it is expected that the first stage of TMDL implementation will be to implement the MPR scenario. MDE cannot provide EPA reasonable assurance at this time that the TMDL allocations can be met given the magnitude of the MS4 allocation and known efficiencies for relevant urban Best Management Practices. However, progress will be made through the iterative implementation process described above and the situation will be reevaluated in the future.

#### and that:

The uncertainty of BMPs effectiveness for bacteria, reported within the literature, is quite large. As an example, pet waste education programs have varying results based on stakeholder involvement. Additionally, the extent of wildlife reduction associated with various BMPs methods (*e.g.*, structural, nonstructural, etc.) is uncertain. Therefore, MDE intends for the required reductions to be implemented in an iterative process that first addresses those sources with the greatest impact on water quality and human health risk [e.g., hot spots], with consideration given to ease of implementation and cost. The iterative implementation of BMPs in the watershed has several benefits: tracking of water quality improvements following BMP implementation through follow-up stream monitoring; providing a mechanism for developing public support through periodic updates on BMP implementation; and helping to ensure that the most cost-effective practices are implemented first.

The adaptive management approach for this restoration plan involves testing, monitoring, evaluating applied strategies, analyzing and interpreting biological assessments at multiple spatial scales, and incorporating new knowledge into management approaches that are based on scientific findings. Adaptive management allows for fine-tuning of actions to increase effectiveness and for adopting new, more-effective strategies (in terms of both removal efficiencies and cost) as they become available. WTM (section 3.2) will aid in evaluating different management scenarios and can be updated to run scenarios using revised BMP efficiencies or different programmatic assumptions.

The interim milestones defined in the implementation schedule (section 6.4) will help guide the adaptive management process. To evaluate whether interim milestones have been achieved, expected load reductions from implementation progress will be compared to monitoring results and BMPs listed in the tracking database. If the expected improvements have been achieved (i.e., reduced loads), then implementation will continue as planned. To continue project implementation and increase public support, the County will publicize existing projects' success and accomplishments. If the monitoring does not show the expected improvements, then the implementation plan will be reevaluated and new actions will be identified to more successfully achieve pollutant reductions.

In the case of the Piscataway Creek watershed, adaptive management is used to assess whether the actions identified as necessary are the correct ones and whether they are working to solve the identified obstacles to the plan implementation. Although the restoration plan was developed using the best available data, unanticipated circumstances might arise. For instance, the installed BMPs might not operate at the level of pollutant removal that was expected (e.g., either higher or lower

removal efficiencies are seen). In addition, a natural disaster could affect the plan's implementation. If BMPs are being implemented at a slower rate than is called for in the restoration plan, the adaptive management process will look at the reasoning behind the lag in implementation and either correct it or propose additional activities to compensate for the lag. Potential reasons for the lags could be a lack of available land, delays in obtaining the necessary permits to construct BMPs, being denied permission to build a BMP on private land, and lapses in funding. In addition, this restoration plan depends on public and private entities modifying some of their behaviors with regard to trash, nutrient management, and pet waste. Without the support of the public and private entities in certain initiatives, the County will need to adapt and revise this restoration plan.

Several aspects of this restoration plan will aid in the adaptive management process:

- This restoration plan was developed using subwatersheds. The smaller area in individual subwatersheds provides a more defined area to identify where BMPs should be implemented and to plan for public outreach activities. The smaller watersheds also make it easier to adjust and modify the restoration plan, if needed, and to identify additional local measures.
- This plan has ambitious expectations regarding the cost and timeframe to install BMPs and implement strategies. Part of the adaptive management strategy is to help reduce the schedule and long-term costs. It is anticipated that future advances in technology will provide more effective reduction measures or that will reduce the schedule and cost of existing measures, thus reducing the long-term cost of this plan.
- The County will use adaptive management to use the most appropriate restoration practices at the best locations. This means that the County will look across land uses to determine locations to get cost-effective load reductions. The County reserves the right to use alternative restoration activities, such as land preservation, if the opportunity arises and the alternative practice will produce greater load reductions than ESD practices or a similar load reduction at a lower cost.
- The County expects that future BMP-related research could result in revised pollution reduction efficiencies or many advances in technology in the coming years due to new regulations. These advances could decrease cost, decrease the footprint of the BMP, and increase load reduction efficiencies. Some of the advances could come from proprietary technologies, which the County will consider using on the basis of their cost and performance.
- Several unknown sources of bacteria and nutrients exist that are difficult to quantify. These sources include illicit sewer connections, SSOs, cross-connections, septic leaks, and atmospheric deposition. Nutrient and bacteria load reductions would be expected from activities that address these sources which are, however, not quantifiable. These activities include (but are not limited to) reductions from WSSC's Sewer Repair, Replacement, and Rehabilitation (SR3) Program; the removal of illicit connections; and reductions of emissions that lead to atmospheric deposition. Load reductions from these activities will decrease the overall amount of BMPs that will need to be installed, thus potentially decreasing cost and moving forward the date of compliance.
- The biological assessment results will be interpreted at multiple spatial scales as degraded/not degraded (for specific stream sites) and percent degradation (for

subwatersheds, basins, and countywide). The County will use these results as the principal indicator of stressor reduction effectiveness. A lack of positive response will be taken as evidence that stressor loads continue to affect the stream biota and that additional or more intensive stormwater management is necessary to achieve ecologically meaningful pollutant reductions.

An additional advantage of this adaptive management approach is that it provides a logical means of reprioritizing funding to areas of the County where water bodies need more attention. That is, where stressor (i.e., pollutant) sources are active and controls have not been attempted or are less than successful, increased effort at stressor control can be targeted. Regular and routine monitoring by the County, MDE, and watershed partners will help make these determinations.

There are BMPs in the County where drainage area, type, and/or installation data are unknown; once the information is available, load reductions from those BMPs could also be counted toward the County's overall load reduction goal. During BMP credit calculations, BMPs without known drainage areas were given the average drainage area for that BMP type. As a result, some drainage areas could have been either slightly over- or underestimated, and correction to the credit calculations will result in more defensible numbers. If updated credit calculations lead to reconsideration of certain aspects of this restoration plan, the County will make the required modifications. The reconciliation process will be part of the adaptive management approach and changes will be made to the plan as necessary.

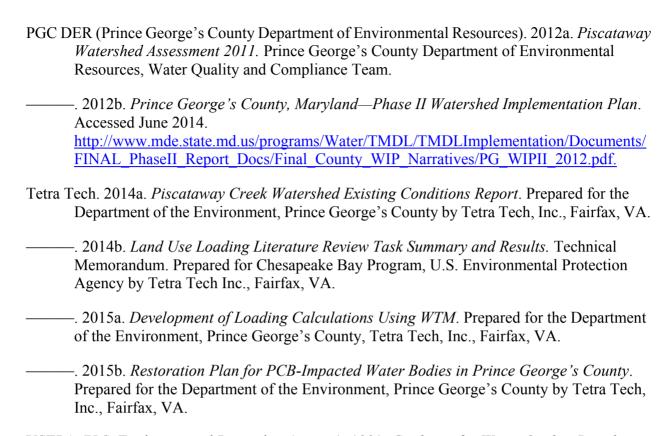
Restoration plan progress will be formally reviewed by MDE. All responsible parties and partnership organizations will be convened to review progress, receive feedback from MDE, and discuss any necessary adjustments to the implementation process. County departments will meet on a more frequent basis to discuss progress, obstacles, successes, and changing needs so that adaptation strategies can be continually refined. The County will reevaluate this plan during its next permit cycle. This evaluation will take advantage of an updated BMP inventory, new BMP technologies, experiences with the new programmatic initiatives, and more recent water quality data.

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# **APPENDIX A: BMP EXAMPLES**

Bioretention or bioswales to convert right-of-way to a green street	A-2
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### Bioretention or bioswales to convert right-of-way to a green street







Source: U.S. Environmental Protection Agency (top); New York City Department of Environmental Protection (middle and bottom)

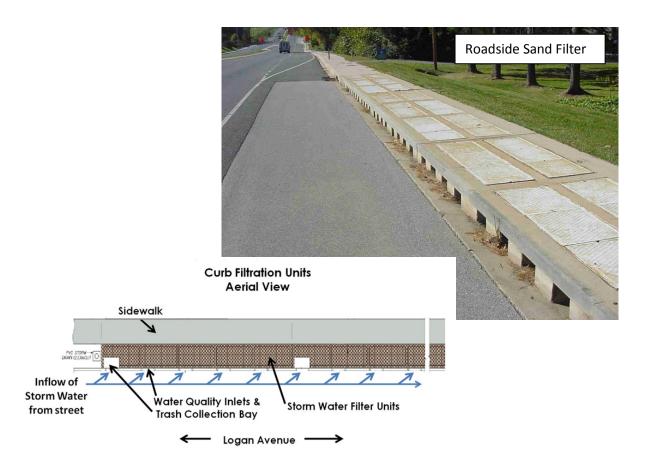
#### Curb extension with bioretention or bioswale





Source: U.S. Environmental Protection Agency (top); Portland Bureau of Environmental Services (bottom)

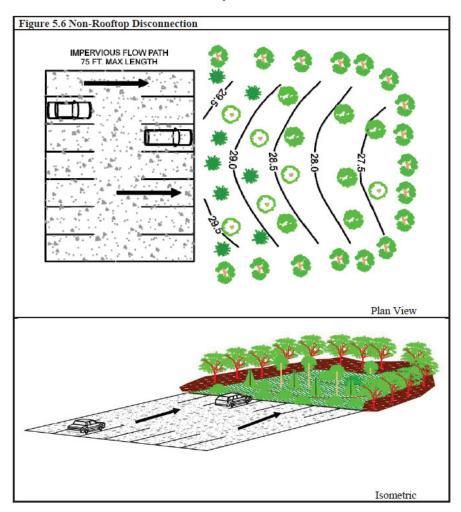
### Curbside filter systems





Source: Delaware Department of Transportation (top); City of San Diego (middle); City of Portland (bottom)

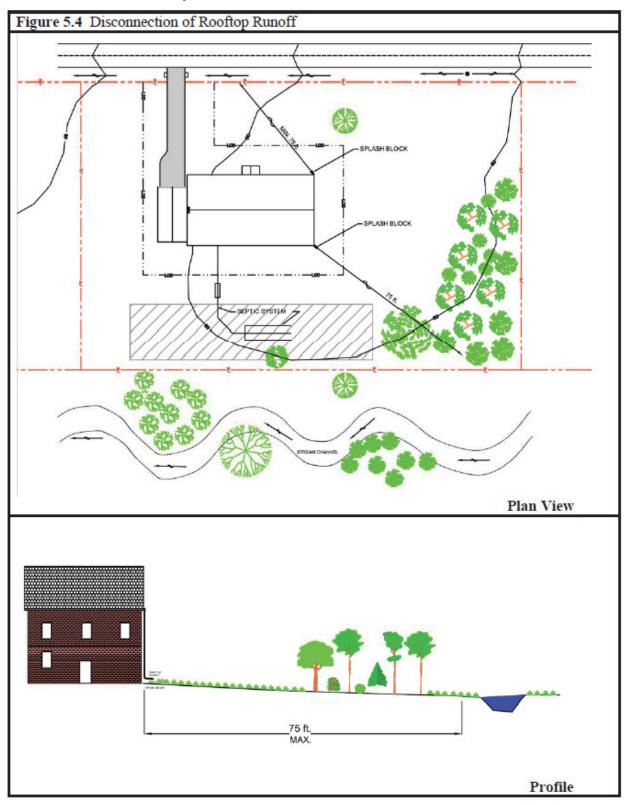
### Disconnection of non-rooftop runoff





Source: Maryland Department of the Environment (top); Ecosite, Inc. (bottom)

### Disconnection of rooftop runoff



Source: Maryland Department of the Environment

# Dry extended detention ponds

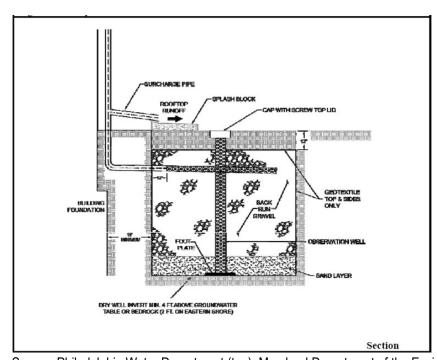




Source: Tetra Tech, Inc.

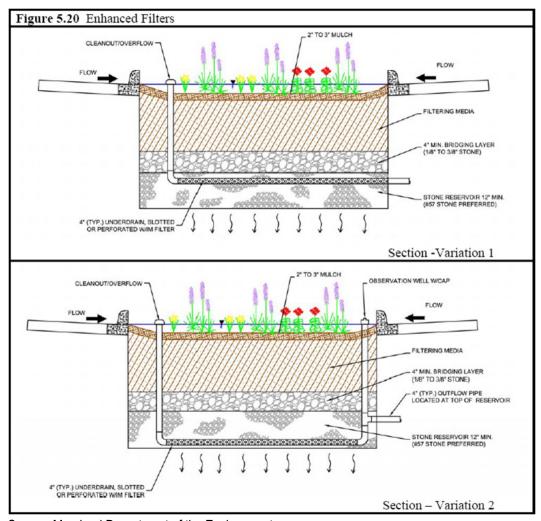
### Dry wells





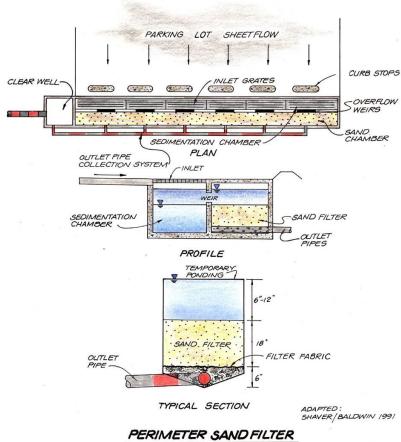
Source: Philadelphia Water Department (top); Maryland Department of the Environment (top right and bottom)

#### **Enhanced filters**



Source: Maryland Department of the Environment

### Filtering practices



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Source: Maryland Department of the Environment

### Grass, wet, or bioswale

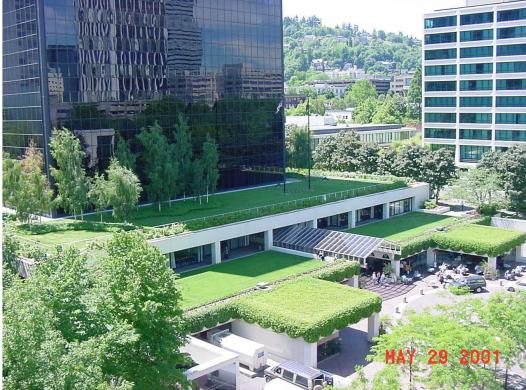




Source: Tom Liptan, Portland Bureau of Environmental Services (*top*); U.S. Environmental Protection Agency (bottom)

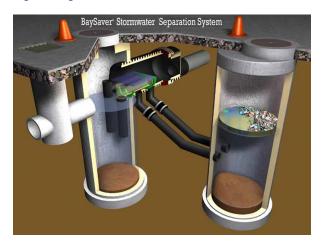
#### Green roofs



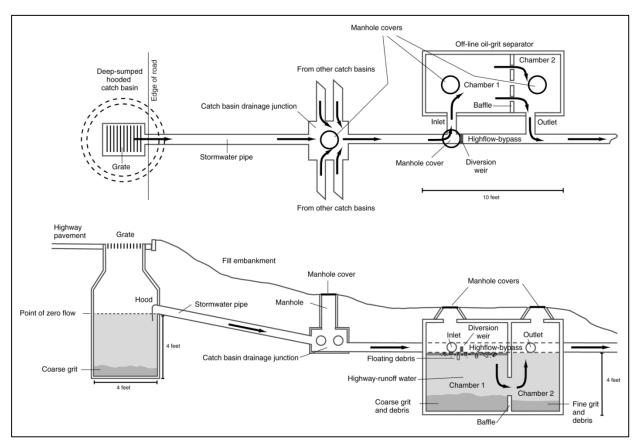


Source: Tetra Tech, Inc.

### Hydrodynamic structures

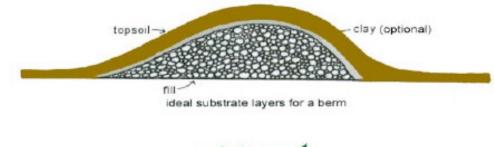


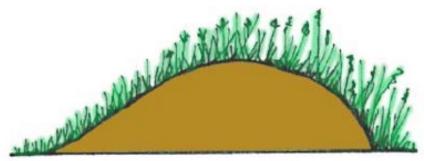




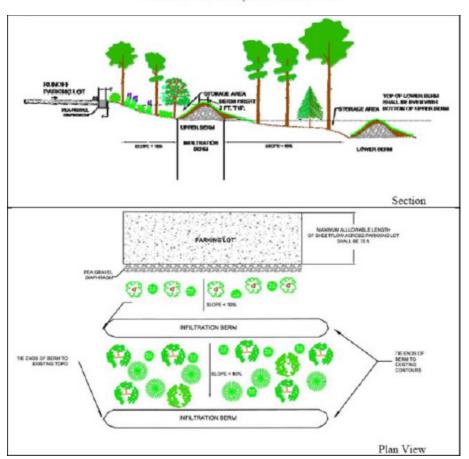
Source: Baysaver Technologies, Inc. (top left) and Contech Engineered Solutions (top right); U.S. Geological Survey (bottom)

#### Infiltration berms





desirable shape for a berm



Source: Pennsylvania Department of Environmental Protection, Stormwater Best Management Practices Manual (top and middle); Maryland Department of the Environment (bottom)

### Infiltration practices

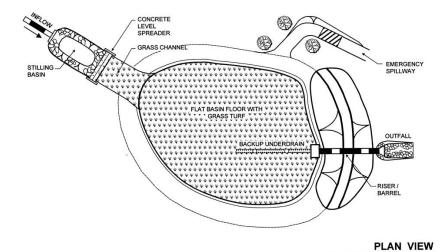


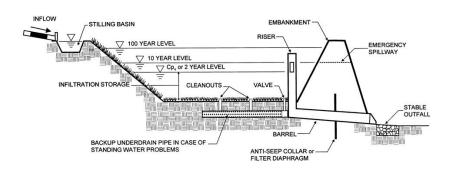


Source: University of Maryland Extension, College of Agriculture and Natural Resources (top); Center for TMDL and Watershed Studies, Virginia Tech (bottom)

#### Infiltration trenches with underdrains







**PROFILE** 

Source: Center for Watershed Protection (top) and Maryland Department of the Environment (bottom)

# Landscape infiltration





Source: Tom Liptan, Portland Bureau of Environmental Services(top), Ecosite,Inc. (bottom)

## Micro-bioretention





Source: Prince George's County, MD

## Permeable pavement shoulder instead of grass shoulder/buffer





Source: U.S. Environmental Protection Agency (top); City of Berkeley, CA Department of Public Works (bottom)

### Permeable pavements / sidewalks



Source: Tetra Tech, Inc. (top and middle), U.S. Environmental Protection Agency (bottom)

## Rain gardens





Source: U.S. Environmental Protection Agency (top); Montgomery County, MD Department of Environmental Protection (bottom)

### Rainwater harvesting





Source: U.S Environmental Protection Agency (top); Tetra Tech, Inc. (middle) Montgomery County, MD Department of Environmental Protection (bottom)

### Reinforced turf



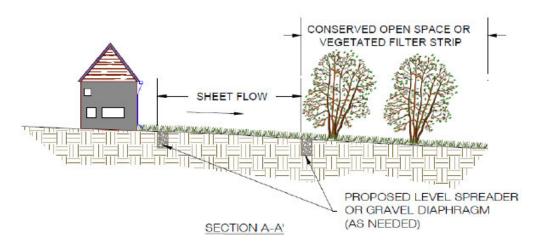


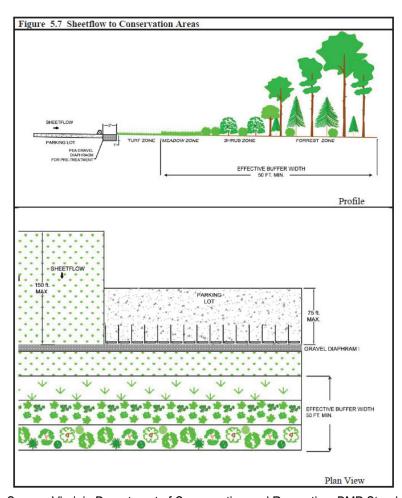


Source: PERFO®

#### Sheet Flow to Conservation Areas

#### PLAN VIEW



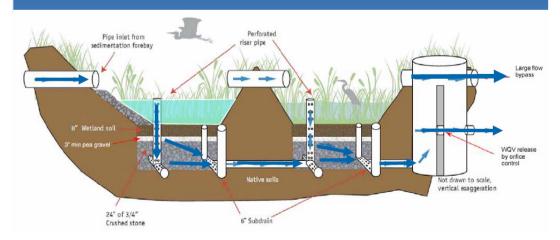


Source: Virginia Department of Conservation and Recreation, BMP Standards and Specifications (top); Maryland Department of the Environment (bottom)

### Submerged gravel wetlands



# Subsurface Gravel Wetland



Source: Maryland Department of the Environment (top); University of New Hampshire Stormwater Center (middle, bottom)

### Swales





Source: Fairfax County, VA (top); California Department of Transportation (bottom)

# Tree planter / Planting trees on impervious urban





Source: U.S. Environmental Protection Agency

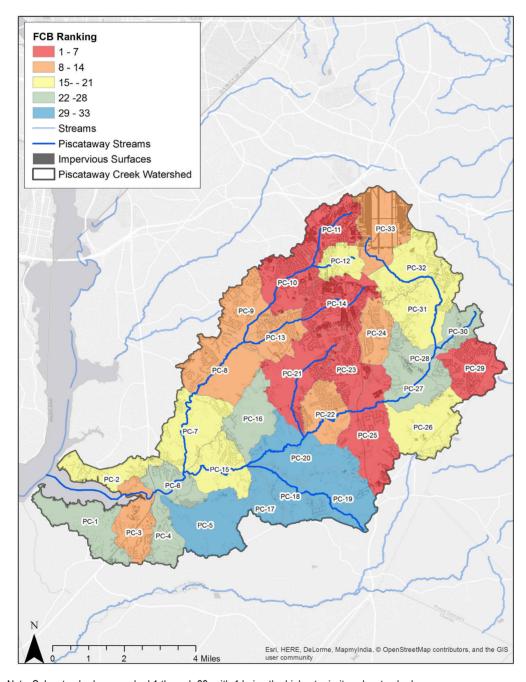
### Wet ponds/wetlands





Source: Montgomery County, MD Department of Environmental Protection (top); U.S. Environmental Protection Agency (bottom)

# APPENDIX B: IMPERVIOUS TO BE TREATED AND LOAD REDUCTIONS BY LAND USE AND SUBWATERSHED



Note: Subwatersheds are ranked 1 through 33, with 1 being the highest priority subwatershed.

Figure B-1. Subwatershed prioritization in the Piscataway Creek watershed in Prince George's County.

Table B-1. Amount of impervious area by land use per subwatershed.

			Impervious Area Treated			
Subwatershed	Subwatershed Group	Total Area (acres)	Right-of-way (acres)	Institutional (acres)	Commercial/ Industrial (acres)	Residential (acres)
PC-1	Not in TMDL	n/a	n/a	n/a	n/a	n/a
PC-10	Tinkers	893.0	34.9	2.7	18.2	6.1
PC-11	Tinkers	312.8	12.6	1.9	31.2	2.0
PC-12	Tinkers	67.0	3.1	0.1	4.3	0.5
PC-13	Tinkers	543.5	21.2	2.7	2.7	3.6
PC-14	Tinkers	1,179.1	44.0	7.2	92.7	7.1
PC-15	Main Stem	516.8	11.8	0.4	0.1	11.1
PC-16	Main Stem	257.9	7.6	0.1	1.9	6.6
PC-17	Main Stem	82.2	1.1	0.0	0.0	1.4
PC-18	Main Stem	197.4	2.9	0.0	0.0	5.2
PC-19	Main Stem	217.0	2.9	0.0	3.0	4.6
PC-2	Not in TMDL	n/a	n/a	n/a	n/a	n/a
PC-20	Main Stem	290.2	3.8	0.0	2.4	6.6
PC-21	Main Stem	780.7	26.9	7.2	4.6	32.3
PC-22	Main Stem	558.1	26.3	1.6	2.8	25.3
PC-23	Main Stem	777.2	18.2	6.5	4.0	16.9
PC-24	Main Stem	591.6	25.5	1.9	1.4	25.7
PC-25	Main Stem	856.5	20.2	14.9	4.2	20.5
PC-26	Main Stem	219.2	5.8	0.0	4.6	4.8
PC-27	Main Stem	111.2	1.7	0.0	0.0	2.1
PC-28	Main Stem	295.9	3.3	0.0	0.0	2.7
PC-29	Main Stem	898.1	21.8	0.9	0.0	16.6
PC-3	Not in TMDL	n/a	n/a	n/a	n/a	n/a
PC-30	Main Stem	256.8	11.9	0.2	0.0	10.5
PC-31	Main Stem	572.6	17.6	1.3	0.0	17.6
PC-32	Main Stem	504.3	7.1	1.2	9.0	11.4
PC-33a	Main Stem	n/a	n/a	n/a	n/a	n/a
PC-4	Not in TMDL	n/a	n/a	n/a	n/a	n/a
PC-5	Not in TMDL	n/a	n/a	n/a	n/a	n/a
PC-6	Not in TMDL	n/a	n/a	n/a	n/a	n/a
PC-7	Tinkers	589.2	23.6	0.1	0.6	4.1
PC-8	Tinkers	661.1	24.1	7.9	5.9	3.5
PC-9	Tinkers	792.9	34.2	4.5	1.2	6.6
TOTAL	Main Stem/ Tinkers	13,022.0	413.9	63.0	194.9	255.4

 $\textit{Note:}\ ^{\text{a}}$  Subwatershed consists entirely of federal property.

Table B-2. Bacteria load reductions (MPN B/yr) from ESD practices per subwatershed.

Subwatershed	Subwatershed Group	ROW	Institutional	Commercial/ Industrial	Residential
PC-1	Not in TMDL	n/a	n/a	n/a	n/a
PC-10	Tinkers	7,117	616	3,299	2,100
PC-11	Tinkers	2,656	448	6,211	617
PC-12	Tinkers	581	8	887	145
PC-13	Tinkers	5,976	643	523	1,268
PC-14	Tinkers	9,398	1,477	16,958	2,172
PC-15	Main Stem	3,344	100	23	4,037
PC-16	Main Stem	2,298	35	63	2,661
PC-17	Main Stem	674	0	0	661
PC-18	Main Stem	2,470	0	0	2,737
PC-19	Main Stem	1,414	0	276	2,038
PC-2	Not in TMDL	n/a	n/a	n/a	n/a
PC-20	Main Stem	1,546	0	125	2,834
PC-21	Main Stem	7,292	1,626	413	12,667
PC-22	Main Stem	6,489	371	195	9,207
PC-23	Main Stem	4,101	1,506	917	5,434
PC-24	Main Stem	7,334	511	315	9,161
PC-25	Main Stem	6,311	2,726	271	7,804
PC-26	Main Stem	2,037	0	574	1,945
PC-27	Main Stem	1,406	0	0	1,150
PC-28	Main Stem	742	0	0	876
PC-29	Main Stem	6,996	164	9	5,846
PC-3	Not in TMDL	n/a	n/a	n/a	n/a
PC-30	Main Stem	3,979	56	0	3,626
PC-31	Main Stem	5,081	286	0	5,929
PC-32	Main Stem	1,387	296	721	3,504
PC-33	Main Stem	n/a	n/a	n/a	n/a
PC-4	Not in TMDL	n/a	n/a	n/a	n/a
PC-5	Not in TMDL	n/a	n/a	n/a	n/a
PC-6	Not in TMDL	n/a	n/a	n/a	n/a
PC-7	Tinkers	6,495	10	94	1,465
PC-8	Tinkers	6,134	1,955	224	1,162
PC-9	Tinkers	9,039	817	272	2,157
TOTAL	Main Stem/Tinkers	112,297	13,651	32,371	93,202

Note: These loadings are planning-level estimates. Actual reductions will differ based on site suitability and implementation costs.

# APPENDIX C: COMPARISONS OF LOAD REDUCTIONS TO CHESAPEAKE BAY TMDL

The Chesapeake Bay and local TMDLs each establish target load reductions for nitrogen, phosphorus, and TSS; the County is required to meet the most stringent of each of the reductions. In 2011, the County received a Chesapeake Bay WLA and percent reduction for the entire County, which MDE disaggregated into watersheds in the MDE *TMDL Data Center*.

The total nitrogen, total phosphorus, and TSS loads for the County's main watersheds were determined using the calibrated implementation model (WTM) that was developed as part of this restoration plan. The purpose of the implementation model was not to recalculate the WLA as defined in the TMDL documents and by the MDE *TMDL Data Center*, but to convert the TMDL load reduction from the original TMDL model to an implementation model that can be effectively used in planning restoration activities. The level of effort (load reduction percentage) to meet water quality standards is kept the same between the two models.

Table C-1 shows the load reduction needed to reach the County's WLA for both the local TMDLs and the Chesapeake Bay TMDL as calculated by WTM. Both sets of required reductions used the same baseline loadings from WTM; then the percent of necessary reduction from the MDE *TMDL Data Center* and the respective local TMDLs were applied to that baseline loading.

The comparison found that the required load reductions established by the local TMDLs for the Anacostia River and Mattawoman Creek watersheds are more stringent than the required overall total nitrogen and TSS load reductions for the County's portion of the Chesapeake Bay WLA. Required load reductions from the local TMDLs would not be sufficient for the County's portion of the total phosphorus Chesapeake Bay WLAs. Therefore, the County will need to implement additional restoration activities elsewhere in the County to meet phosphorus WLAs for the Chesapeake Bay TMDL.

Table C-1. Comparison of required load reductions using WTM: Chesapeake Bay TMDL and local TMDLs

	-	MDL-Required Lo Iculated Using W (lb/yr)		Local TMDL-Required Load Reductions Calculated Using WTM (lb/yr)			
Watershed	Nitrogen	Phosphorus	TSS	Nitrogen	Phosphorus	TSS	
Anacostia River	56,693	13,932	1,876,139	227,917	28,573	5,200,998	
Mattawoman Creek	1,779	754	134,487	9,329	1,083	n/a	
Lower Patuxent River	5,127	1,224	177,401	n/a	n/a	n/a	
Middle Patuxent River	3,527	814	105,450	n/a	n/a	n/a	
Upper Patuxent River	11,771	2,785	503,515	n/a	18	188,692	

	Chesapeake TMDL-Required Load Reductions Calculated Using WTM (lb/yr)			Local TMDL-Required Load Reductions Calculated Using WTM (lb/yr)			
Watershed	Nitrogen	Phosphorus	TSS	Nitrogen	Phosphorus	TSS	
Piscataway Creek	25,336	6,022	758,703	n/a	n/a	n/a	
Potomac River	43,576	8,912	784,156	n/a	n/a	n/a	
Western Branch	30,612	6,922	706,167	n/a	n/a	n/a	
Total	178,422	41,365	5,046,018	237,246	29,674	5,389,690	

#### Notes:

n/a: This watershed did not have a local TMDL for the listed parameter; therefore, there is no required load reduction. The phosphorus and TSS calculations in this table are not adjusted for streambank erosion, as was done in the local TMDL plans. The conversions factors, which vary by watershed, are unknown for most watersheds.

The impervious area treated by BMPs identified in the WIP were compared with the impervious area treated by the local TMDL restoration plans, as presented in Table C-2. The impervious areas treated were pulled directly from the WIP and local TMDL restoration plans. It can be seen from this comparison that overall, the impervious area treated in the restoration plans is greater than the impervious area treated as determined in the WIP. This is true especially for the ESD practices.

Table C-2. Comparison of impervious area treated for the Chesapeake Bay WIP and local TMDL restoration plans

	Impervious Area Treated from Chesapeake WIP (acres)			Impervious Area Treated from Local TMDL Restoration Plans (acres)			
Watershed	ESD	Non-ESD	Stream Restoration <sup>a</sup>	ESD	Non-ESD	Stream Restoration <sup>a</sup>	
Anacostia River	1,333	3,050	1,123	9,962	167	750	
Mattawoman Creek	25	58	21	383	5	0	
Lower/Middle Patuxent River	38	86	32	n/a	n/a	n/a	
Upper Patuxent River	192	440	162	102	42	0	
Piscataway Creek	265	607	224	927	73	0	
Potomac River	408	935	344	1,926	102	0	
Western Branch	418	956	352	n/a	n/a	n/a	
Total	2,679	6,131	2,258	13,300	388	750	

#### Notes:

n/a: This watershed did not have a local TMDL; therefore, no BMPs have been identified.

Table C-3 presents the required load reductions for the WIP (using WTM) compared to the local TMDL restoration plan load reductions for BMPs and other restoration practices (e.g., street sweeping, nutrient management). Table C-3 has load reductions identified for the watersheds that had a local TMDL, even if it did not have required load reductions for a parameter. For instance,

<sup>&</sup>lt;sup>a</sup> 1 linear foot of stream restoration is considered as 0.01 impervious acre equivalent (MDE 2014a).

Piscataway Creek has a local TMDL for bacteria, but load reductions for nitrogen, phosphorus, and TSS are listed because the BMPs required to reduce bacteria loads also will reduce nitrogen, phosphorus, and TSS loads.

As shown, the load reductions from the BMPs and other restoration practices in TMDL restoration plans are greater than the required load reductions from the Chesapeake Bay TMDL to total nitrogen and TSS, however additional total phosphorus reductions are necessary.

Table C-3. Comparison of Chesapeake Bay TMDL required load reductions using WTM and load reductions from BMPs from local TMDL restoration plans

	Chesapeake TMDL-Required Load Reductions Calculated Using WTM (lb/year)			Load Reductions from BMPs and Other Restoration Practices Identified in Local TMDL Restoration Plans Calculated Using WTM (Ib/yr)			
Watershed	Nitrogen	Phosphorus	TSS	Nitrogen	Phosphorus	TSS	
Anacostia River	56,693	13,932	1,876,139	199,915	32,195	25,609,036	
Mattawoman Creek	1,779	754	134,487	7,068	1,202	215,470	
Lower Patuxent River	5,127	1,224	177,401	n/a	n/a	n/a	
Middle Patuxent River	3,527	814	105,450	n/a	n/a	n/a	
Upper Patuxent River	11,771	2,785	503,515	6,817	1,055	197,547	
Piscataway Creek	25,336	6,022	758,703	17,075	1,983	365,044	
Potomac River	43,576	8,912	784,156	25,283	3,587	666,370	
Western Branch	30,612	6,922	706,167	n/a	n/a	n/a	
Total	178,422	41,365	5,046,018	256,158	40,022	27,053,467	

#### Notes:

n/a: This watershed did not have a local TMDL; therefore, no BMPs were identified.

The phosphorus and TSS in this table are not adjusted for streambank erosion, as was done in the local TMDL plans. The conversions factors, which vary by watershed, are unknown for most watersheds.

#### **APPENDIX D: FUNDING OPPORTUNITIES**

- Chesapeake Bay Trust
  - Demonstration scale, community-based, on-the-ground restoration projects:
     Stream bank stabilization; BMPs (LID), wetland creation and enhancement
  - Watershed Assistance Grant Program: Technical planning and design assistance
  - Outreach and Community Engagement Grant Program: Implements community-led stewardship efforts
- National Fish and Wildlife Foundation Chesapeake Bay Stewardship Fund
  - Competitive grant programs: Innovative Nutrient and Sediment Reduction and Small Watersheds
- National Fish and Wildlife Federation Five Star and Urban Waters Restoration Grant Program
  - Coastal, wetland, and riparian restoration
  - Focus on education and training encouraging a diverse group of community partners
- Chesapeake Wildlife Heritage
  - Provides technical assistance and project labor for wetland, riparian buffer, and other related creation and restoration projects.
- Maryland Landowner Incentive Program
  - Competitive grants for private land owners
  - Funds reforestation, grassland and forest buffers
- Urban Waters Small Grants
  - Engages communities with environmental justice concerns
  - Provides education and resources through \$40,000-\$60,000 grants
- American Forests Global ReLeaf
  - Reforestation on public lands (>20 acre plantable areas)
  - Provides funding, cost-sharing, technical assistance, site prep, seedling purchase
- EPA Environmental Education Model Grant
  - The Environmental Education Regional Grant Program aims to increase public awareness and knowledge about environmental issues. The program provides skills for participants to make informed environmental decisions and perform actions to help the environment.
- EPA Clean Water State Revolving Fund
  - Provides low-interest and flexible-term loans to help communities meet the goals of the Clean Water Act.