



# Maryland

## Department of the Environment

**Wes Moore**, Governor  
**Aruna Miller**, Lt. Governor

**Serena McIlwain**, Secretary  
**Suzanne E. Dorsey**, Deputy Secretary  
**Adam Ortiz**, Deputy Secretary

May 1, 2025

Ms. Shannon Moore, Manager  
Frederick County Department of Sustainability and Environmental Resources  
301 North Market Street  
Frederick, Maryland 21701

Dear Ms. Moore:

This letter acknowledges the Maryland Department of the Environment's (Department) receipt of Frederick County's 2024 Financial Assurance Plan (FAP), and 2024 Watershed Protection and Restoration Program (WPRP) Annual Report as required by the Annotated Code of Maryland. This FAP submission includes information on the cost of compliance with the impervious surface restoration plan (ISRP) requirements outlined in the County's National Pollutant Discharge Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) permit.

The ISRP, when sufficiently funded, is essential for restoring local water quality and the Chesapeake Bay, and providing climate resiliency in the County's watersheds. The FAPs are sufficient if they demonstrate that the County has the dedicated revenues, funds, or sources of funds to meet, for the 2-year period immediately following the filing date of the FAP, 100% of the projected costs of compliance with the ISRP requirements of the County's MS4 permit.

After reviewing the County's 2024 FAP, the Department has determined that the County has demonstrated that it has sufficient funding in its FAP. The Department has provided more detailed comments in an attachment for the County's information and use. The County's next WPRP Annual Report will be due in coordination with its next MS4 Annual Report, and its FAP will be due in coordination with the 2026 MS4 Annual Report.

The Department recognizes the substantial effort required in developing these FAPs and WPRP Annual Reports, and looks forward to working with the County on this very important environmental program for improving water quality, stormwater management, and climate resiliency. If you have any questions regarding this review, please contact me at 410-537-3567 or Jennifer M. Smith at 410-537-3561, or [jenniferm.smith@maryland.gov](mailto:jenniferm.smith@maryland.gov).

Sincerely,

D. Lee Currey  
Director, Water and Science Administration

cc: Jennifer M. Smith, P.E., Program Manager, Stormwater, Dam Safety, and Flood Management Program  
Donald Dorsey, Department Head Stormwater, Frederick County

Attachment

## Review of Frederick County's 2024 Financial Assurance Plan (FAP)

Plan Condition	Assessment and Recommendations
Demonstration of Sufficient Funding	<ul style="list-style-type: none"> <li>• Frederick County (County) submitted its FAP on December 26, 2024.</li> <li>• A public hearing was held on December 17, 2024 and the FAP was approved on December 18, 2024.</li> <li>• The FAP demonstrates sufficient funding for the projected Impervious Surface Restoration Plan (ISRP) costs for the next two-year period (i.e., FY2025-FY2026).</li> </ul>
Actions to Meet Permit Requirements	<ul style="list-style-type: none"> <li>• The plan included an Executive Summary.</li> <li>• The “All Actions” worksheet includes best management practices (BMPs) and associated costs for FY2023 to FY2029.</li> <li>• For the next two years (FY2025-FY2026), the County plans to complete 396 acres of new restoration. Additionally, the County will maintain 62 acres of operational BMPs established in the previous permit.</li> </ul>
Annual and Projected Costs	<ul style="list-style-type: none"> <li>• The “All Actions - Planned” worksheet indicated that projected cost for new restoration to be implemented over the next two fiscal years (FY2025-FY2026) is \$20.5 million (M), and the projected cost for maintaining operational BMPs established in the previous permit is \$0.2 M.</li> <li>• In the “ISRP Costs” worksheet, costs were reported through FY2029, and the cost for the next two years is \$23.6M.</li> </ul>
Annual and Projected Revenues	<ul style="list-style-type: none"> <li>• The “ISRP Revenue” worksheet included projected revenues through FY2029.</li> <li>• Reported revenue for FY2025 and FY2026 (\$23.6M) is equal to the projected ISRP costs (\$23.6M).</li> </ul>
Funding Sources	<ul style="list-style-type: none"> <li>• In the “Fund Sources” worksheet, fund sources were projected through FY2029.</li> <li>• Sources of funds for the next two years include: <ul style="list-style-type: none"> <li>◦ General Obligation Bonds = \$15.8M</li> <li>◦ Other = \$7.9M</li> <li>◦ Federal Grants = \$0.8M</li> <li>◦ State Grants = \$0.3M</li> <li>◦ Stormwater Remediation Fee = \$0.001M</li> <li>◦ Total Funding Sources = \$24.8M</li> </ul> </li> </ul>
Specific Actions and Expenditures from Previous Fiscal Years	<ul style="list-style-type: none"> <li>• The “Specific Actions – Completed” worksheet included FY2018 to FY2024 BMPs and expenditures for 295 acres of new restoration and 62 acres of maintained operational BMPs established in the previous permit.</li> </ul>