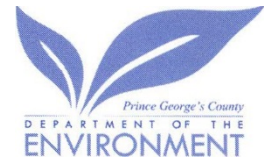




THE PRINCE GEORGE'S COUNTY GOVERNMENT
Department of the Environment



Angela D. Alsobrooks
 County Executive

Andrea L. Crooms
 Director

November 22, 2021

Mr. D. Lee Currey, Director
 Water and Science Administration
 Maryland Department of the Environment
 Montgomery Park
 1800 Washington Blvd., Suite 4502
 Baltimore, Maryland 21230-1718

Dear Mr. Currey,

This correspondence is in reference to the final NPDES MS4 5th Generation Permit draft provided by MDE as part of the tentative determination in November 2021. The County has reviewed the final draft and has follow-up questions for the following topics:

- Under Part E-3 of the Permit, it requires the County to restore an additional 2,137 acres of impervious area. During prior discussions with MDE, we had discussed recognizing an *additional* 7% impervious surface restoration production with the next generation permit, as we understood those discussions - this would be 7% of the current impervious baseline minus the restored impervious progress made during the 4th Gen permit. The County has calculated the 7% restoration requirement as indicated in the following table. Please clarify which 7% applies.

Next GEN Permit (5th Gen) Restoration Obligation	
Established Impervious Area Baseline (2015)	30,524.00
20-Percent requirement under 4th Gen Permit (continue thru consent decree)	6,105
Remaining MS4 regulated Baseline (30,524 - 6,105)	24,419
5th Gen MS4 NPDES Restoration Obligation (7%)	1,709

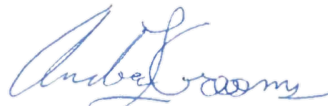
- Under Part IV. D-1 C & D of the Permit, it requires the County to maintain and inspect stable stormwater conveyance and capacity to receiving waters. The County requests further clarification of what MDE deems a stable stormwater conveyance, and capacity/scale to receiving waters. These statements do not provide clear guidance of what MDE expects from the County.

Mr. D. Lee Currey
November 22, 2021
Page Two

- Under Part IV. D-4-b-vi of the Permit, it requires the County to prepare written procedures for performing stormwater conveyance system inspections for removing debris that may cause clogging, backups, and flooding. The County requests further clarification of what MDE deems stormwater conveyance system inspection and how it relates to the Good Housekeeping Plan (GHP) objectives. Generally, stormwater conveyance inspections are conducted by the County through the stormwater management assets maintenance.
- Under Part IV. D. 4.b., the Permit requires the County shall develop, implement, and maintain a good housekeeping (GHP) for County-owned properties not required to be covered under Maryland's SW Industrial GP where activities listed in PART IV.D.4.a are performed. The permit also references separate GHPs may be developed for properties with similar use (e.g., recreation and parks properties, school properties). The County requests further clarification if GHPs for these other properties with "similar use" are a requirement of the County?

The County appreciates the cooperation and partnership with MDE and looks forward to continued collaboration throughout the Next Generation Permit. Should you have any questions, please do not hesitate to contact me on these matters, for technical questions please contact Mr. Jeffery M. DeHan, Associate Director, SMD at (301)-883-5795.

Sincerely,



Andrea L Crooms
Director

cc: Suzanne Dorsey, Ph.D., Assistant Secretary, MDE

Jennifer Smith, Program Manager, Stormwater, Dam Safety and Flood Management Program, Water and Science Administration, MDE

Raymond Bahr, Deputy Program Manager, Stormwater, Dam Safety and Flood Management Program, Water and Science Administration, MDE

Stew Comstock, Program Review Division Chief, Stormwater, Dam Safety and Flood Management Program, Water and Science Administration, MDE

Michelle Russell, Deputy Director, DoE

Jeffrey M. DeHan, Associate Director, Stormwater Management Division, DoE

Martin Harris, Deputy Director, DPW&T

Malinda Bolling, Director, DPIE

Charlie Griffith, Associate Director, Storm Drain Maintenance
Division, DPW&T

Mary Giles, Associate Director, Site & Road Plan Review Division,
DPIE