

# **Montgomery County's MS4 Permit Implementation Strategy: Using the Watershed Treatment to meet local and Bay restoration goals**

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and

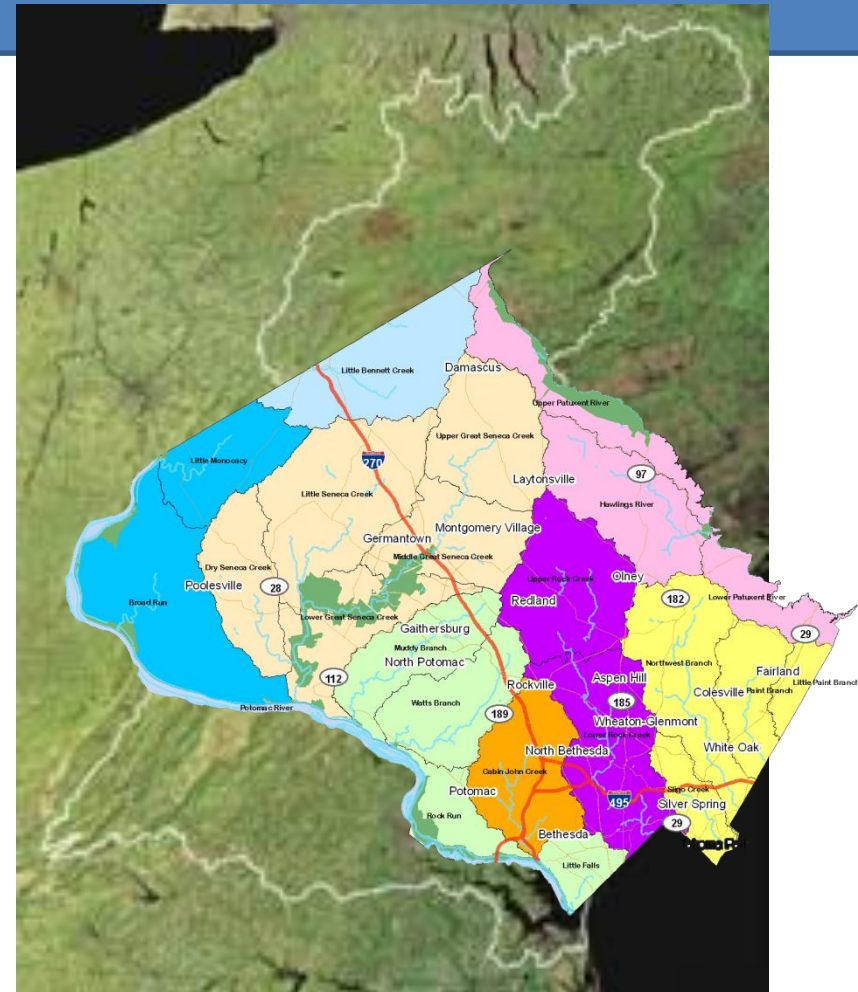
Meo Curtis, Montgomery County DEP

# Presentation Outline

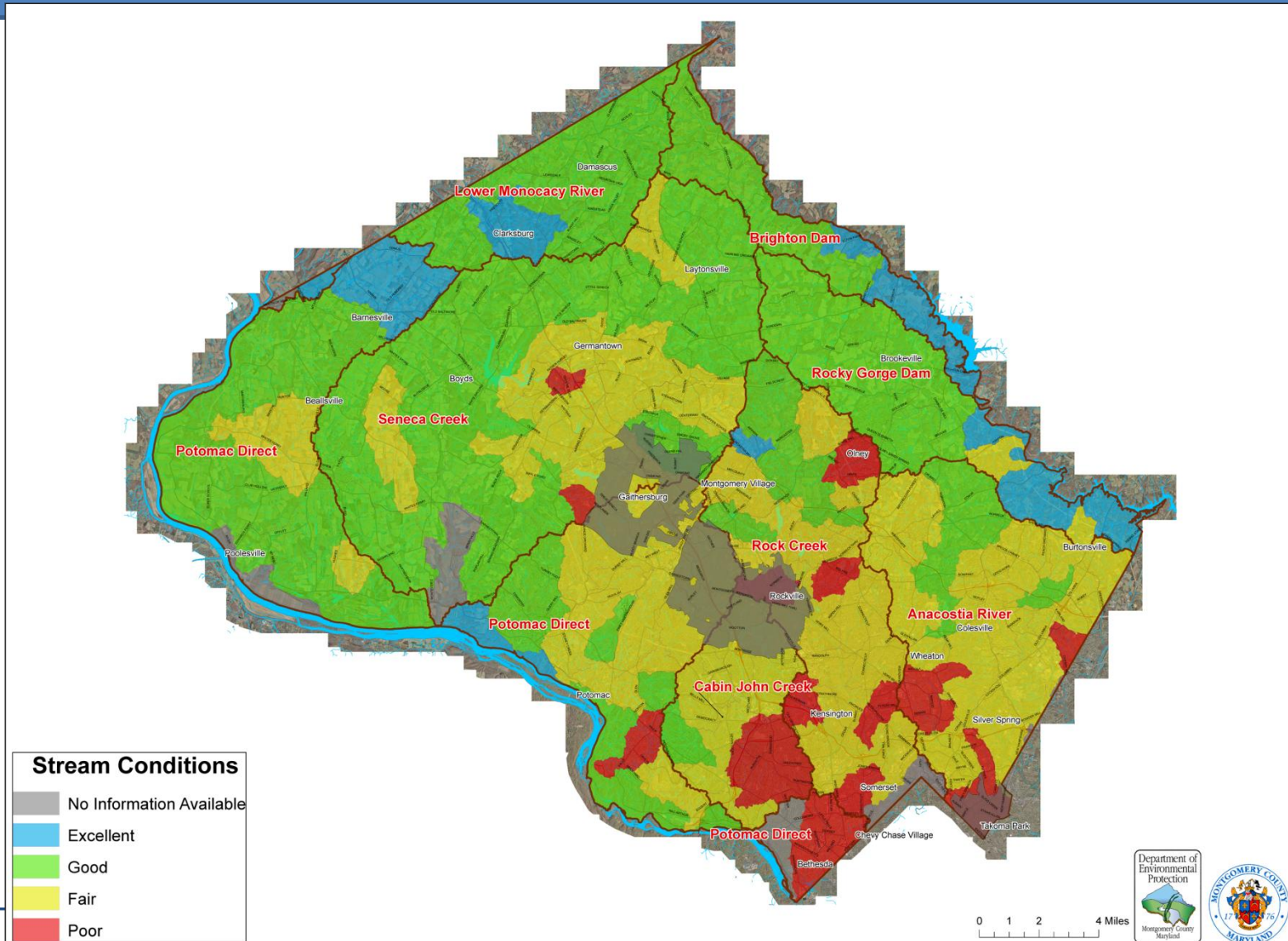
- Background
- County's MS4 Permit Implementation Strategy
- Use of WTM as Assessment Tool
- Lessons Learned and Challenges

# Montgomery County, MD

- 500 sq. miles
- 970,000 people
- About 12% impervious overall
  - About 8,500 acres
  - Equal to Area of Washington, DC
- Second only to Baltimore City within Maryland in average people per square mile
- >95% of land zoned for development has already been developed
- Two major basins:  
Potomac and Patuxent Rivers
- 8 major local watersheds

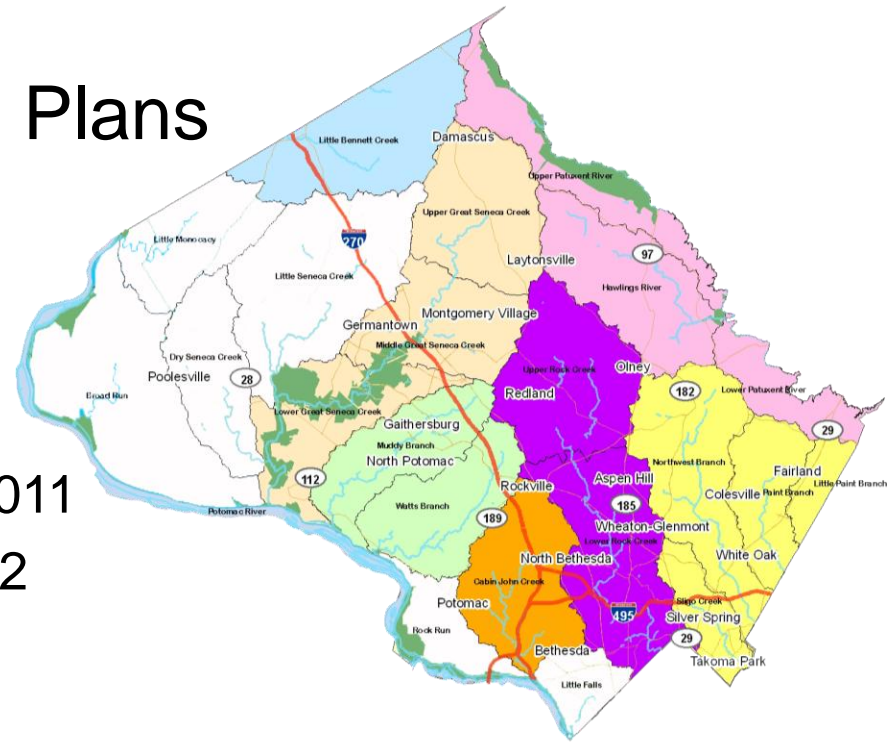


# Montgomery County Major Watersheds



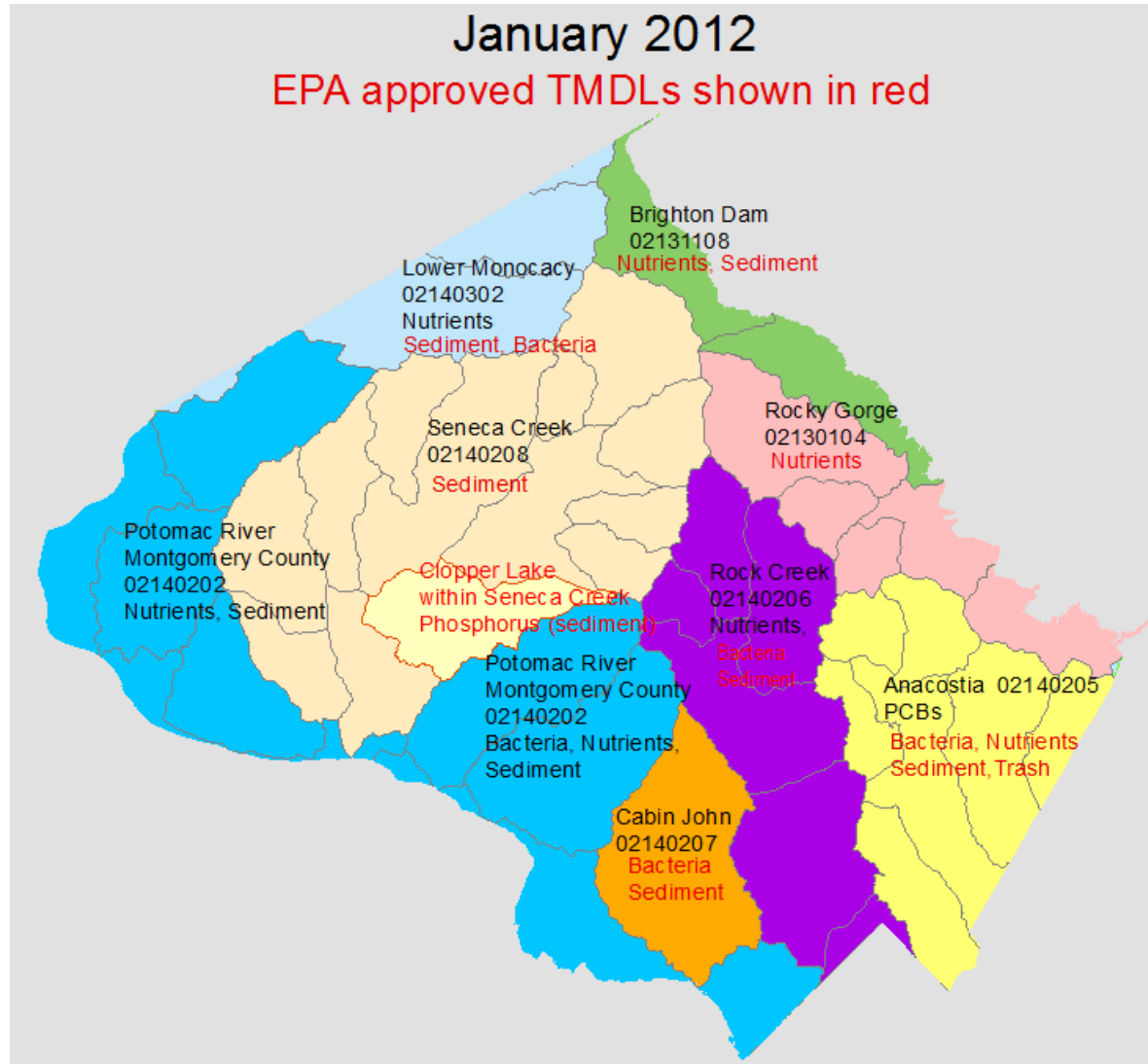
# Countywide Coordinated Implementation Strategy

- Meet MS4 permit goals
- Watershed Implementation Plans
- Bay TMDL
- Timeline
  - Began in June 2009
  - Submitted to MDE in February 2011
  - MDE approved plans in July 2012



□ = No Implementation Plans

# Total Maximum Daily Loads





# Primary Driver: Restoration Goal

- By February 2015, add stormwater management to an additional **20% of impervious area** currently not treated to the maximum extent practicable (MEP)

Description	Area in Acres
Total	324,552
Total Area of Impervious Surface	35,965
County Subject to Stormwater Permit (1)	138,649
Impervious Cover Subject to Stormwater Permit	25,119
Adequately Treated Impervious Cover	3,661
Inadequately Treated Impervious Cover	21,458
<b>20% of Inadequately Treated Impervious Cover</b>	<b>4,292</b>

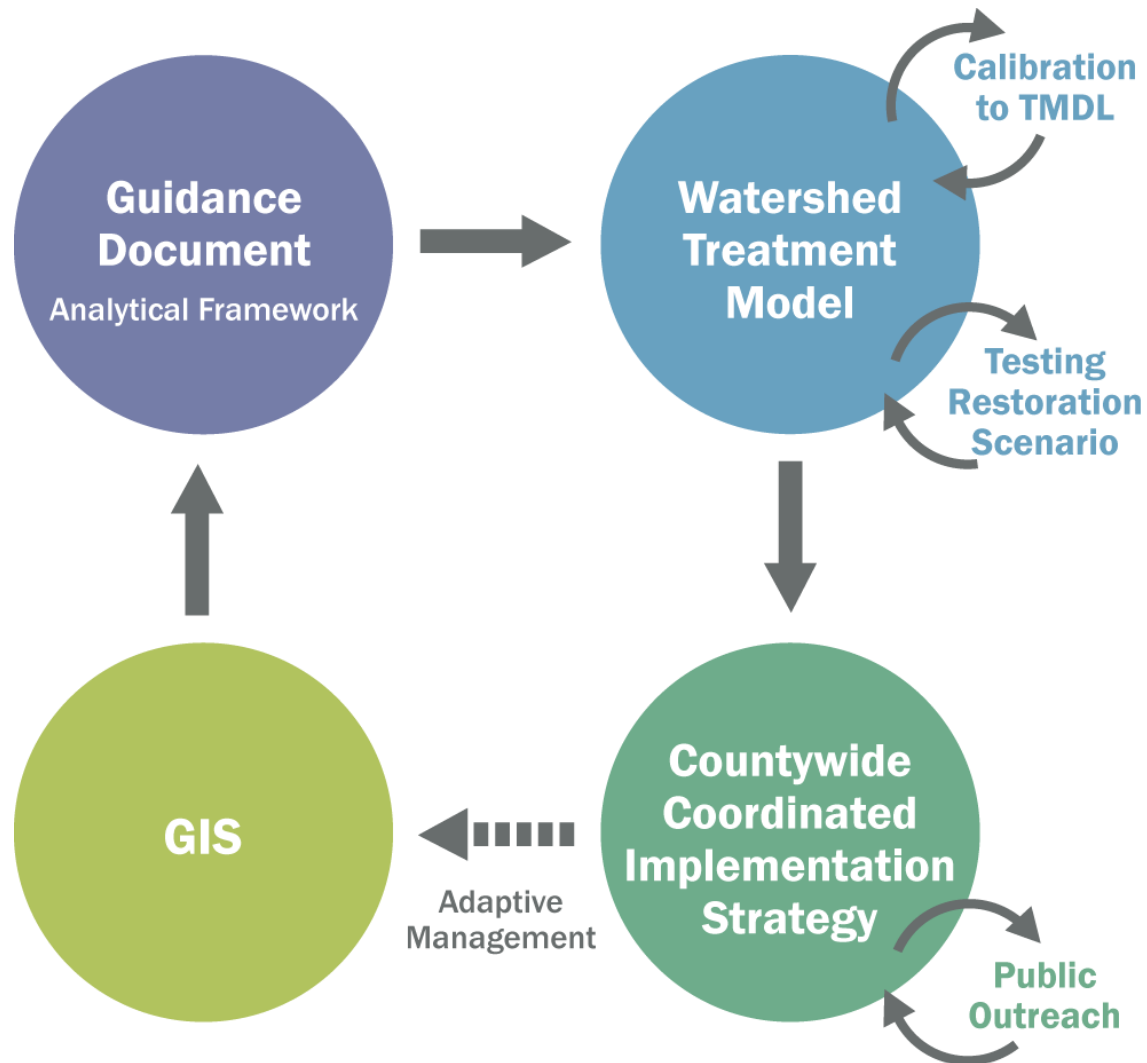
(1) Exclusions include: Certain zoning codes, parklands, forests, municipalities with own stormwater management programs, state and federal properties, and state and federal maintained roads

# Compliance Targets

Target Date	Compliance Target	Metric
2015	20% impervious cover treatment requirement	~4,300 acres of Impervious Cover
2017	Meet the interim dates and targets for the Chesapeake Bay TMDL	9%, 12%, and 20% respectively for TN, TP, and TSS reductions from baseline conditions
2020	Meet the full compliance and targets for the Chesapeake Bay TMDL	18%, 34%, and 37% respectively for TN, TP, and TSS reductions from baseline conditions
	Meet additional impervious cover treatment targets associated with next MS4 Permit cycle (assumes another 20% target)	~3,400 acres of Impervious Cover (20% of impervious remaining after 2015)
2025	Meet additional impervious cover treatment targets associated with next MS4 Permit cycle (assumes another 20% target)	~2,750 acres of Impervious Cover (20% of impervious remaining after 2020)
2030	Out year compliance with other watershed TMDLs	100% compliance with MS4 Permit Area WLAs



# Modeling Framework



# WTM Basis

- Army Corps of Engineers used for Anacostia Study (2010)
- Started with an updated version of the WTM which included volume reduction, received from Deb Caraco (Oct 2009)

# Analytical Approach

## Watershed Treatment Model



**Land Use**

- EMC (Urban)
- Unit Load (Non-urban)



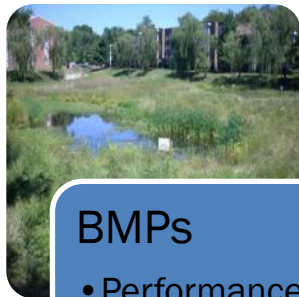
**Soils & Rainfall**

- Annual Runoff Volume



**Pollutant Load**

- Before treatment



**BMPs**

- Performance Code
- Removal Efficiency



**Discount Factors**

- BMP specific
- Treatability Factor



**Pollutant Reduction**

- Applied to baseline load

Land Conversion									
Function	Area Available	Area Converted	TN	TP	TSS	W	SW	SW	SW
Land Use Conversion (Urban)	1000	1000	1000	1000	1000	1000	1000	1000	1000
Land Use Conversion (Non-urban)	1000	1000	1000	1000	1000	1000	1000	1000	1000
Stormwater Retention	1000	1000	1000	1000	1000	1000	1000	1000	1000
Stormwater Treatment	1000	1000	1000	1000	1000	1000	1000	1000	1000

Stormwater Retrofits									
Option	Summarize BMPs	Total Area	Retention	Removal	Efficiency	SW	SW	SW	SW
Option 1	Summarize BMPs	1000	1000	1000	1000	1000	1000	1000	1000
Option 2	Summarize BMPs	1000	1000	1000	1000	1000	1000	1000	1000
Option 3	Summarize BMPs	1000	1000	1000	1000	1000	1000	1000	1000

**WTM 1.0**

- Baseline Conditions

**WTM 2.0**

- Completed as of 2009; High Priority; Low Priority and Other Potential Projects

**WTM 3.0**

- ESD Strategies and Other Structural BMPs

**WTM 4.0**

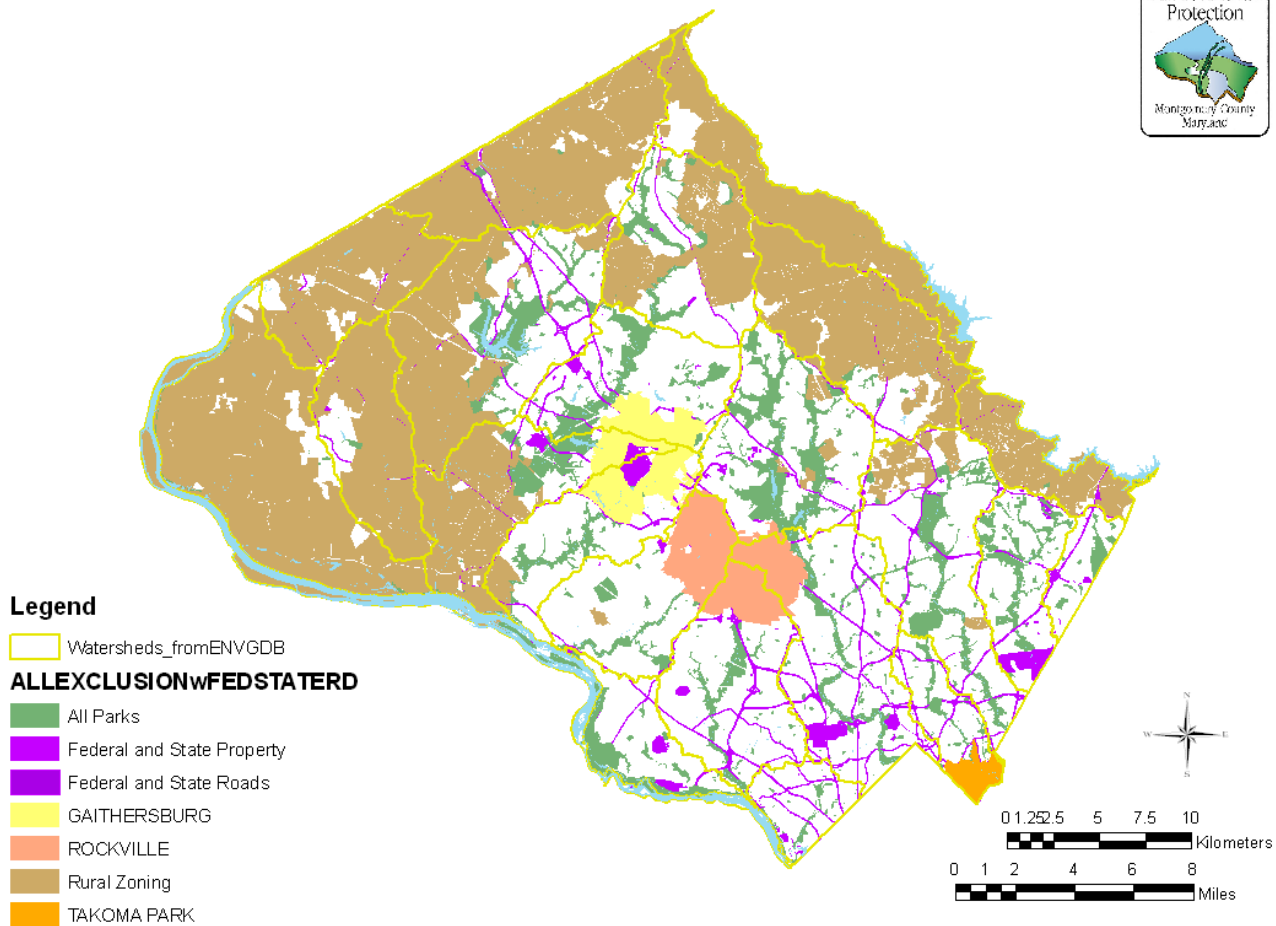
- Habitat Restoration

**WTM 5.0**

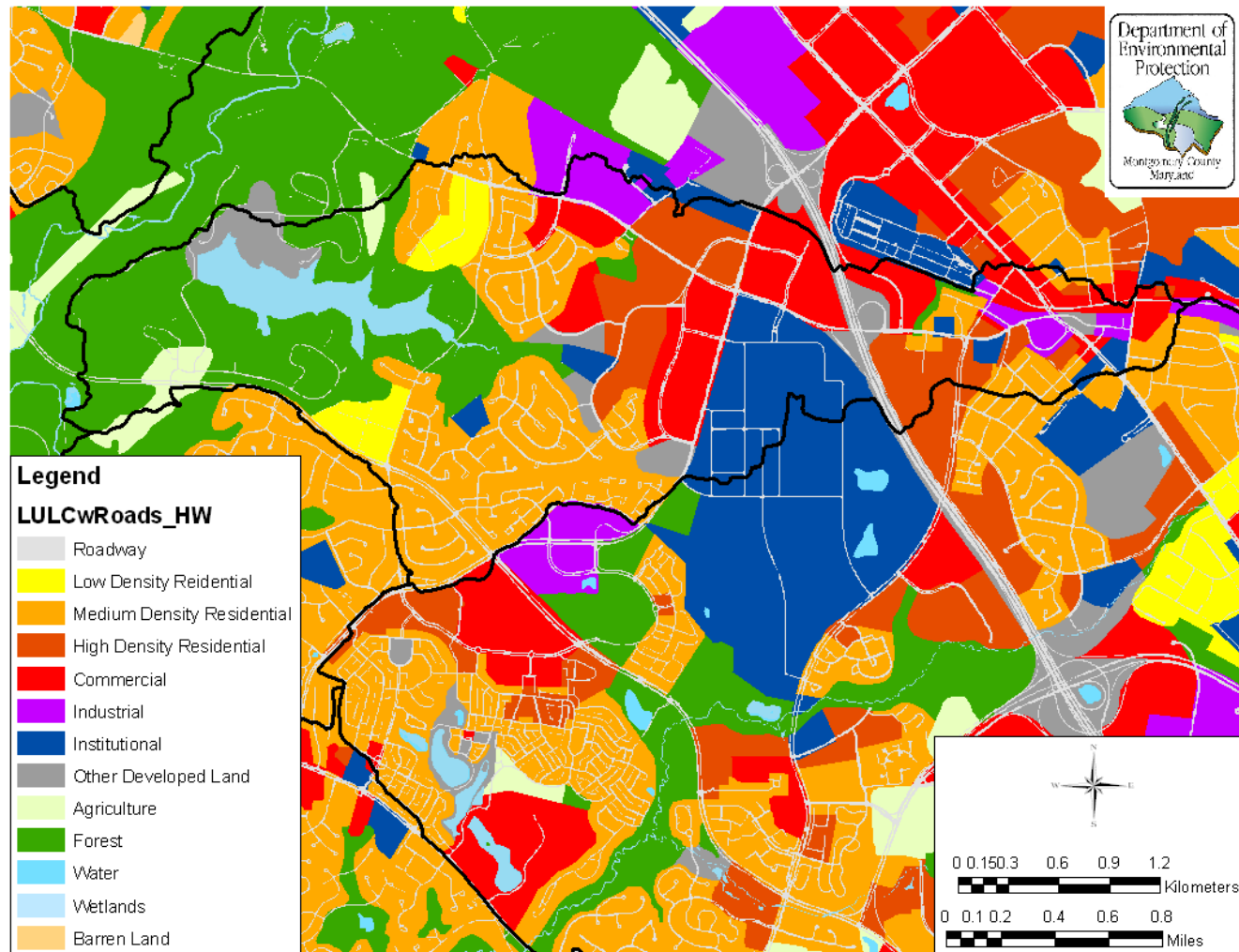
- MS4 Programmatic Practices

# **WTM Process**

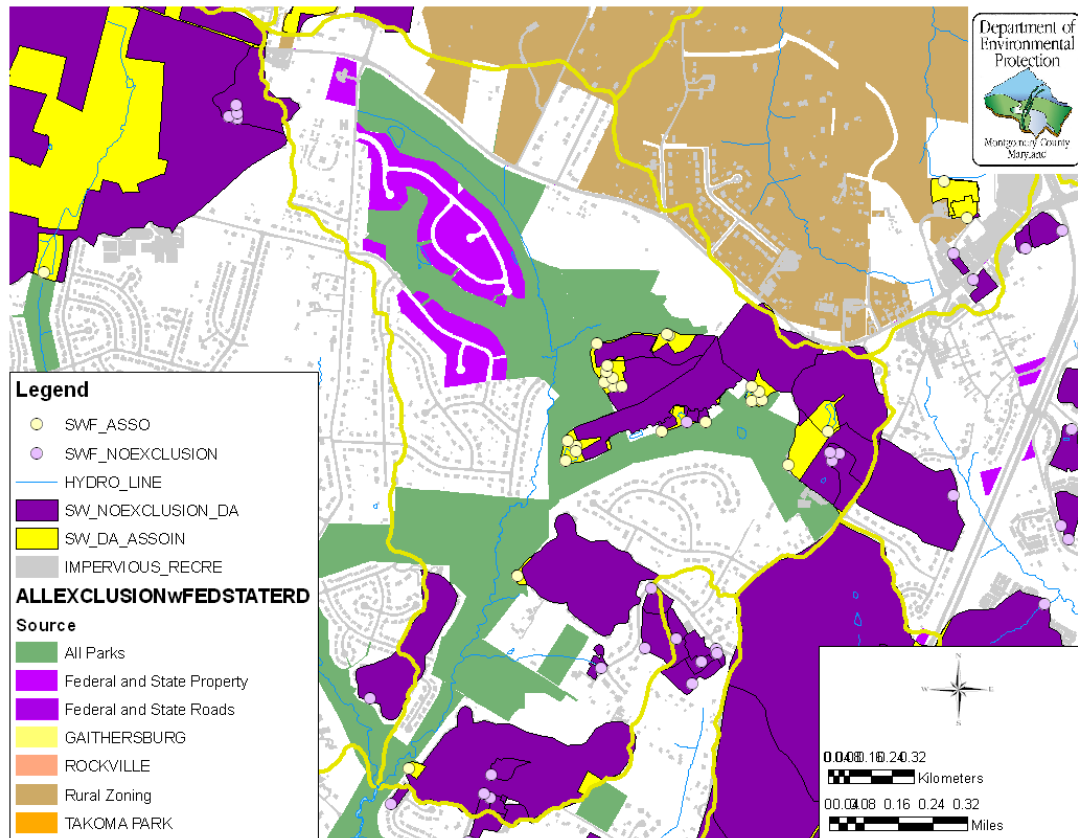
# Watersheds and Excluded Areas



# Land Use and Land Cover



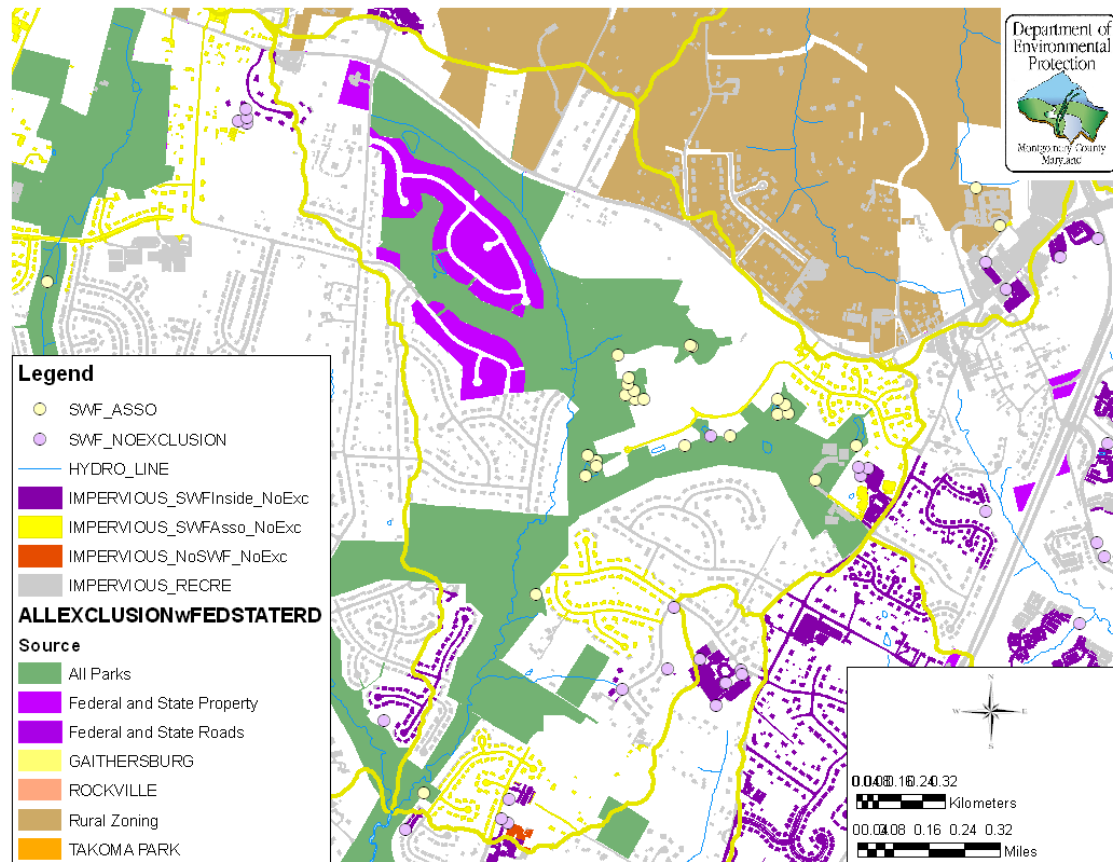
# Urban BMP Database





# Impervious Cover

- IMPERVIOUS\_RECRE
  - This information was updated by DEP staff on December 10, 2009



# TMDL “Calibration”

- TMDL Onion
  - Land use discrepancies with Waste Load Allocations
  - Watershed-specific EMCs or loading rates



# Primary Sources

- The Land Use Categories were adjusted in the Primary Source tab according to the categories given in the Guidance Document.

Green cells need to be completed by the user  
 Blue cells have default or calculated values but may be substituted  
 Grey cells should generally not be changed  
 Purple Cells Reflect "Bottom Line" Loads or Load Reductions

**BEFORE**

PRIMARY SOURCES - Land Use		
Watershed		Area (Acres)
Category	Detailed Description	
Residential	LDR (<1du/acre)	
	MDR (1-4 du/acre)	
	HDR (>4 du/acre)	
	Multifamily	
Commercial	Commercial	
Roadway	Roadway	
Industrial	Industrial	

Green cells need to be completed by the user  
 Blue cells have default or calculated values but may be substituted  
 Grey cells should generally not be changed  
 Purple Cells Reflect "Bottom Line" Loads or Load Reductions

**AFTER**

PRIMARY SOURCES - Land Use		
Watershed		Area (Acres)
Category	Detailed Description	
Residential	LDR (<1du/acre) Hi	3806.6
	MDR (1-4 du/acre) Hi	4560.75
	HDR (>4 du/acre) Hi	841.7
	LDR (<1du/acre) Lo	3806.6
	MDR (1-4 du/acre) Lo	4560.75
	HDR (>4 du/acre) Lo	841.7
Municipal/Institutional	Muni/Insti- Intensive	1422.8
	Muni/Insti- Extensive	852.8
Commercial	Commercial- Hot	65.7
	Commercial- Not	809
Roadway	Roadway	1837.9
Industrial	Industrial-Hot	36.8
	Industrial-Not	691

# Primary Sources

- The Impervious Cover % and Turf Cover % were adjusted in the Primary Source tab according to the values given in the Guidance Document.

Land Use	Area (Acres)	BEFORE	
		Impervious Cover (%)	Turf Cover (%)
<b>Detailed Description</b>			
LDR (<1du/acre)		12%	70%
MDR (1-4 du/acre)		21%	40%
HDR (>4 du/acre)		33%	34%
Multifamily		44%	45%
			0%
			0%
			0%
			0%
			0%
<b>Commercial</b>		72%	22%
			0%
			0%
			0%
<b>Roadway</b>		80%	16%
			0%
			0%
			0%
<b>Industrial</b>		53%	38%
			0%
			0%
			0%
			0%

Land Use	Area (Acres)	Impervious Cover (%)	AFTER
			Turf Cover (%)
<b>Detailed Description</b>			
LDR (<1du/acre) Hi	3806.6	13%	79%
MDR (1-4 du/acre) Hi	4560.75	25%	61%
HDR (>4 du/acre) Hi	841.7	37%	48%
LDR (<1du/acre) Lo	3806.6	13%	79%
MDR (1-4 du/acre) Lo	4560.75	25%	61%
HDR (>4 du/acre) Lo	841.7	37%	48%
Muni/Insti- Intensive	1422.8	35%	51%
Muni/Insti- Extensive	852.8	9%	55%
Commercial- Hot	65.7	72%	13%
Commercial- Not	809	72%	13%
			0%
			0%
			0%
<b>Roadway</b>	1837.9	90%	3%
			0%
			0%
			0%
			0%
<b>Industrial-Hot</b>	36.8	53%	32%
<b>Industrial-Not</b>	691	53%	32%
			0%
			0%
			0%



# EMC Determination

Table B.1 EMCS for Use in WTM

Land Use	TSS (mg/L)	TP (mg/L)	TN (mg/L)	Bacteria <sup>1</sup> (MPN/100mL)
Residential	59 mg/l	ALL: 0.3	ALL 2.0	4200
		HI: 0.4	HI: 2.5	
		LO: 0.2	LO: 1.5	
Commercial	ALL: 55	ALL: 0.22	ALL:2.2	3000
	HOT: 150	HOT: 0.60	HOT: 6.00	
	NOT: 50	NOT: 0.20	NOT: 2.00	
Highway	53	0.3	2.3	2000
Industrial	ALL: 73	ALL: 0.26	ALL: 2.1	2850
	HOT: 230	HOT: 0.60	HOT: 6.00	
	NOT: 65	NOT: 0.24	NOT: 1.9	
Municipal	18	0.22	1.8	3400
All Land Uses	62	0.27	2.0	4000

Source: Pitt, R. 2008. National Stormwater Quality Database Version 3. University of Alabama and CWP (2003) for TN

ALL: Median for all land uses

HI: High input turf, assumed to be 50% of all residential turf

LO: Low input turf, assumed to be 50% of all residential turf

HOT: Stormwater hotspot, area defined by Property database features selected by commercial/industrial land use and water quality complaint database.

NOT: Not a stormwater hotspot, all areas not defined as HOT

<sup>1</sup> Concentrations shown are for fecal coliform bacteria as no stormwater monitoring data is available for enterococci (see Section 5.4)

# Existing Management Practices

- Edits performed to BMP pollutant removal efficiencies according to Guidance Document.

**BEFORE**

Structural Stormwater Management Practices	
	Total Area Captured (Acres)
BMP Type	
Dry Water Quantity Pond	
Dry Extended Detention Pond	
Wet Pond	
Wetland	
Filters	
Green Roof	
Rooftop Disconnection	
Permeable Pavement	
Grass (open) Channel	
Dry Swale (bioswale, WQ swale)	
Wet Swale	
Raintanks and Cisterns	
Soil Amendments	
Sheetflow to Open Space (excluding riparian buffers)	
Bioretention with Underdrain	
Bioretention Without Underdrain (infiltration design)	
Infiltration Practices	
<b>Total</b>	<b>0</b>
<b>Treatability</b>	<b>Capture Discount (D1)</b>
#DIV/0!	1



**AFTER**

Structural Stormwater Management Practices	
	Total Area Captured (Acres)
BMP Type	
Code 4: ESD BMPs	334.5
Code 3: Effective BMPs	3639.0
Code 2: Underperforming BMPs	143.4
Code 1: Non-performing BMPs	1613.6
Stand-Alone Code 0: Pretreatment BMPs	335.6
<b>Total</b>	<b>6066.09</b>
<b>Treatability</b>	<b>Capture Discount (D1)</b>
0.20	1



# Existing Management Practices

- Edits performed to BMP pollutant removal efficiencies according to Guidance Document.

Structural Stormwater Management					Runoff
	Efficiency				Reduction (%)
BMP Type	TN	TP	TSS	Bacteria	
Dry Water Quantity Pond	5%	10%	10%	0%	0%
Dry Extended Detention Pond	10%	15%	55%	30%	0%
Wet Pond	30%	50%	80%	70%	0%
Wetland	25%	50%	75%	80%	0%
Filters	30%	60%	80%	35%	0%
Green Roof	45%	45%	80%	0%	45%
Rooftop Disconnection	25%	25%	85%	0%	25%
Permeable Pavement	60%	60%	75%	0%	45%
Grass (open) Channel	30%	25%	60%	0%	10%
Dry Swale (bioswale, WQ swale)	55%	50%	85%	0%	40%
Wet Swale	25%	20%	70%	0%	0%
Raintanks and Cisterns	40%	40%	40%	0%	40%
Soil Amendments	50%	50%	75%	0%	50%
Sheetflow to Open Space (excluding riparian buffers)	50%	50%	85%	0%	50%
Bioretention with Underdrain	65%	55%	85%	90%	40%
Bioretention Without Underdrain (infiltration design)	65%	55%	85%	90%	40%
Infiltration Practices	55%	65%	95%	85%	50%
<b>Total</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>

BEFORE



AFTER

Structural Stormwater Management					Runoff
	Efficiency				Reduction (%)
BMP Type	TN	TP	TSS	Bacteria	Trash
Code 4: ESD BMPs	65%	65%	90%	75%	60%
Code 3: Effective BMPs	40%	50%	80%	65%	10%
Code 2: Underperforming BMPs	5%	5%	20%	10%	5%
Code 1: Non-performing BMPs	0%	0%	5%	0%	0%
Stand-Alone Code 0: Pretreatment BMPs	5%	5%	20%	10%	25%
<b>Total</b>	<b>40%</b>	<b>48%</b>	<b>77%</b>	<b>62%</b>	<b>15%</b>

# BMP Codes

**Table B.16 General BMP Coding of Montgomery County BMP Database**

Performance Code	Structure Type
<b>Code 0: Pretreatment BMPs</b>	Baysaver (BAYSAV), Interceptor (INT), Vortech (VORTEC), Oil/grit separator (SEP), Stormceptor (STC), Flowsplitter (FS), Plunge Pool (PP), V2B1 (V2B1), Vegetated Pool (VP), Aquaswirl (AQSW)
<b>Code 1: Non-performing BMPs</b>	Control Structure underground (CS), Pond-dry quantity control (PDQN), Underground detention (UG), Underground with stone bottom (UGINF), Pond-dry quantity control and extended detention (PDQNE)
<b>Code 2: Under-performing BMPs</b>	Pond-dry quantity control and sand filter base (PDQNSF), Pond-infiltration basin quality control (PDIB), Pond-infiltration basin with extended detention (PDIBED), Pond-infiltration basin quantity control (PDIBQN), Stormfilter (STFIL), Aquafilter (AQFIL)
<b>Code 3: Effective BMPs</b>	Pond-wet quantity control and extended detention (PDWTED), Pond-wet quantity control and extended detention (PDWTQNE), Pond-infiltration basin quantity control and extended detention (PDIBQNE), Sand filter (SF), Sand filter quantity control (SFQN), Oil/grit separator and sand filter (SEPSF), Sand filter underground (SFU), Pond-wetland (PDWD), Pond-wetland with extended detention (PDWDED), Pond-wetland quantity control and extended detention (PDWTQN), Pond-wet quality and quantity control (PDWT),
<b>Code 4: ESD BMPs</b>	Dry swale (DS), Bioretention quality control (BR), Bioretention quantity control (BRQN), Infiltration trench quality control (INF), Infiltrator (INFIL), Infiltration trench quality and quantity control (INFQN), Infiltration trench quality control underground (INFU), Infiltration trench quality and quantity control buried non-surface fed (INFUQN), Level Spreader (LS), Peat sand filter (PSF), and Vegetated Swale (VS).

# Removal Efficiencies

<b>Performance Category</b>	<b>RR<sup>1</sup> (%)</b>	<b>Discount Factor<sup>2</sup></b>	<b>TSS<sup>3</sup> (%)</b>	<b>TN<sup>4</sup> (%)</b>	<b>TP<sup>5</sup> (%)</b>	<b>FC<sup>6</sup> (%)</b>
0 - Pretreatment BMPs	5	0.15	20	5	5	10
1 - Non-performing BMPs	0	0.05	5	0	0	0
2 - Underperforming BMPs	5	0.15	20	5	5	10
3 - Effective BMPs	10	0.75	80	40	50	65
4 - ESD Practices	60	1.0	90	65	65	75

(from Schueler, 2010)

<sup>1</sup> RR: percent annual reduction in post development runoff volume for storms

<sup>2</sup> Discount Factor: Fraction of contributing impervious acres effectively treated to the Water Quality Volume, used to rate BMP treatability

<sup>3</sup> TSS: Sediment Removal rate

<sup>4</sup> TN: Total Nitrogen Removal Rate

<sup>5</sup> TP: Total Phosphorus Removal Rate

<sup>6</sup> FC: Fecal Coliform Removal Rate

# Future Management Practices

- Post-TMDL BMPs from the Urban BMP database

<b>Stormwater Retrofits</b>		
Retrofit Reporting Option	1. Summarize In Table Below	
<b>Option 1. Summarize BMPs</b>	Total Area	Impervious Cover
BMP Type	Captured (Acres)	Captured (Acres)
Code 4: ESD BMPs*	31.4	11.6
Code 3: Effective BMPs*	199.4	36.6
Code 2: Underperforming BMPs*	83.8	4.2
Code 1: Non-performing BMPs*	76.7	1.0
Stand-Alone Code 0: Pretreatment BMPs*	21.7	1.7
Retrofit: Code 4	185.8	0.0
Retrofit: Code 3	3009.0	182.8
Retrofit: Code 2	115.2	28.5
Retrofit: Code 1	1587.1	405.2
Retrofit: Code 0	46.5	15.1
LID	2263.5	1416.3
New Ponds	1322.0	291.5
Level 3 Projects	1506.73	1074.65
Level 3 Retrofit: Code 2	111.80	44.60
Level 3 Retrofit: Code 1	102.94	45.13
100% Rainscapes Neighborhoods	1172.53	445.56
100% NR Accounts	708.06	269.06

# Future Management Practices

- Restoration Sites BMPs (WTM 2.0)

<b>Stormwater Retrofits</b>		
Retrofit Reporting Option	1. Summarize In Table Below	
<b>Option 1. Summarize BMPs</b>	Total Area	Impervious Cover
BMP Type	Captured (Acres)	Captured (Acres)
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100% Rainscapes Neighborhoods	1172.53	445.56
100% NR Accounts	708.06	269.06

# Future Management Practices

- and Additional Retrofit opportunities (WTM 3.0) which include County lands (schools, buildings, roads, and parking lots) and targeted neighborhoods

<b>Stormwater Retrofits</b>		
Retrofit Reporting Option	1. Summarize In Table Below	
<b>Option 1. Summarize BMPs</b>	Total Area	Impervious Cover
BMP Type	Captured (Acres)	Captured (Acres)
Code 4: ESD BMPs*	31.4	11.6
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100% Rainscapes Neighborhoods	1172.53	445.56
100% NR Accounts	708.06	269.06

# Future Management Practices

- Expanded number of Land Conversion rows to accommodate different land types.

Awareness of Message (Fraction of Population)					
Fraction willing to change behavior					
Land Conversion					
Fraction Implemented		100%			
Land Use (Choose from Dropdown List)	Acres Available	Acres Converted	TN lb/acre/year	TP lb/acre/year	
LDR (<1du/acre) Lo	3806.60	11.60	3.87400478	0.52	
MDR (1-4 du/acre) Lo	4560.75	10.40	4.907006608	0.65	
Muni/Insti- Extensive	852.80	21.10	3.392379876	0.41	
Rural	641.60	4.90	4.6	0.70	
Roadway	1837.90	10.10	17.74976047	2.32	
Commercial- Not	809.00		12.84036983	1.28	
Industrial-Not	691.00		9.848717054	1.24	
Land Use		Acres Created	TN lb/acre/year	TP lb/acre/year	
Forest	N/A		2.5	0.2	
Rural	N/A		4.6	0.7	
Forest	N/A		2.5	0.2	
Forest	N/A		2.5	0.2	
Forest	N/A		2.5	0.2	
Forest	N/A	58.10	2.5	0.2	

IMPORTANT NOTE: These blue cells reference data from the Level4 Projects Tab.



# Other Restoration Practices

**Table B.20. Nutrient and Sediment Removal Rates for Non-Retrofit Practices**

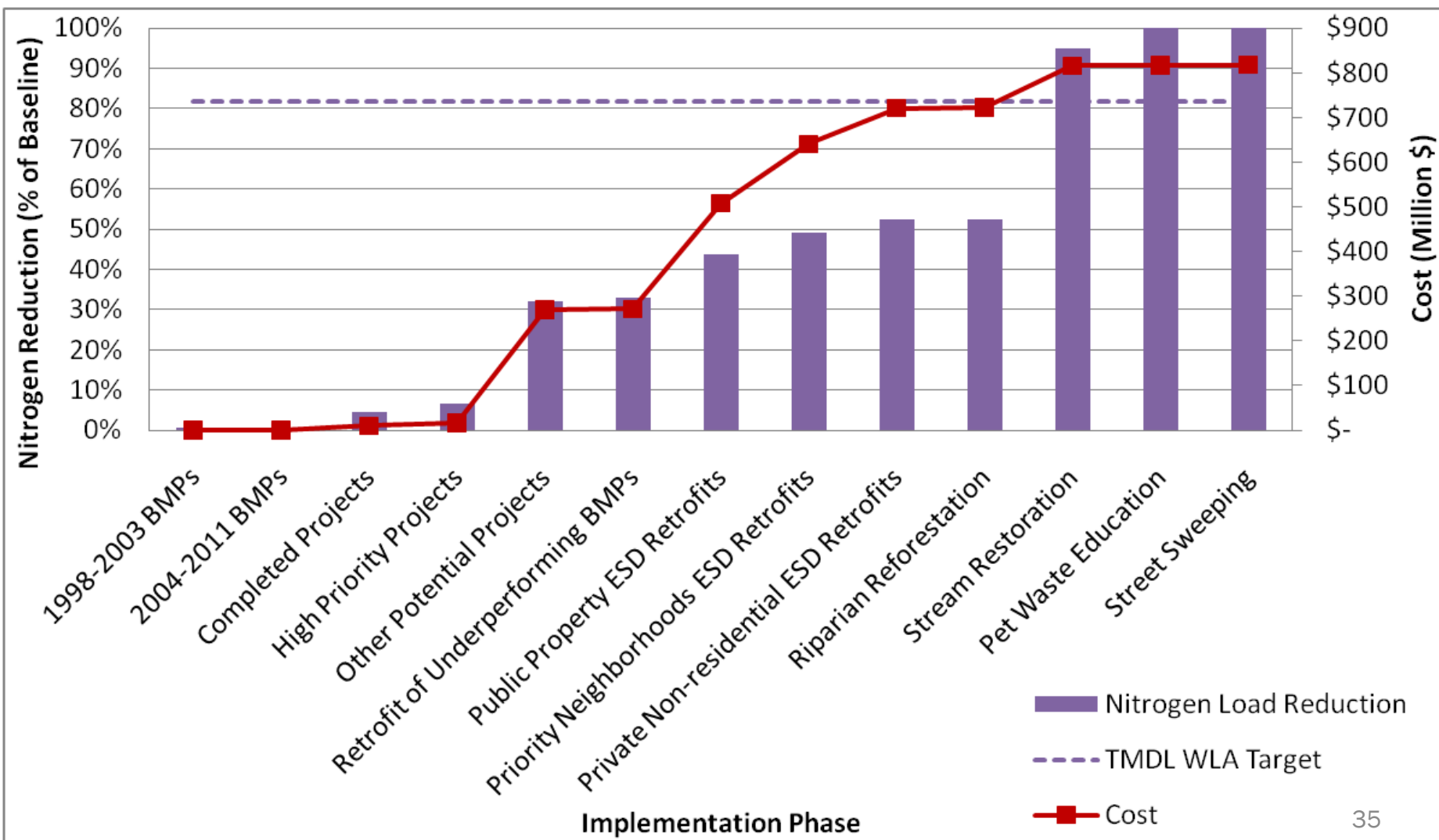
Practice	TN Removal	TP Removal	TSS Removal	Reporting Units
Riparian Forest Planting	25%	50%	50%	Acres
Upland Planting (on Turf)	A	A	A	Acres
Septic Denitrification	55	0	0	Systems
Septic Pumping	5	0	0	Systems
Septic connections/hookups	55	0	0	Systems
Emergent marsh restoration	42	55	75	Acres
Palustrine Forest wetland restoration	43	58	75	Acres
Stream restoration	0.20 lbs	0.068 lbs	310 lbs	Linear Ft.
Riparian forest buffers (ag)	60	70	75	Acre treated
Stream fencing and off-stream watering	60	60	75	Acres treated
Residential Nutrient Management	B	B	B	Acres
Hotspot Management	C	C	C	Acres
Enhanced Street Sweeping	5	15	20	Acres

Note A: Shift from turf to forest cover in WTM and change EMC to forest (from turf)

Note B: Shift from hi input EMC to low input turf EMC within WTM

Note C: Shift from hotspot EMC to not hotspot EMC within WTM

# Anacostia Nutrient TMDL: removal per Strategy



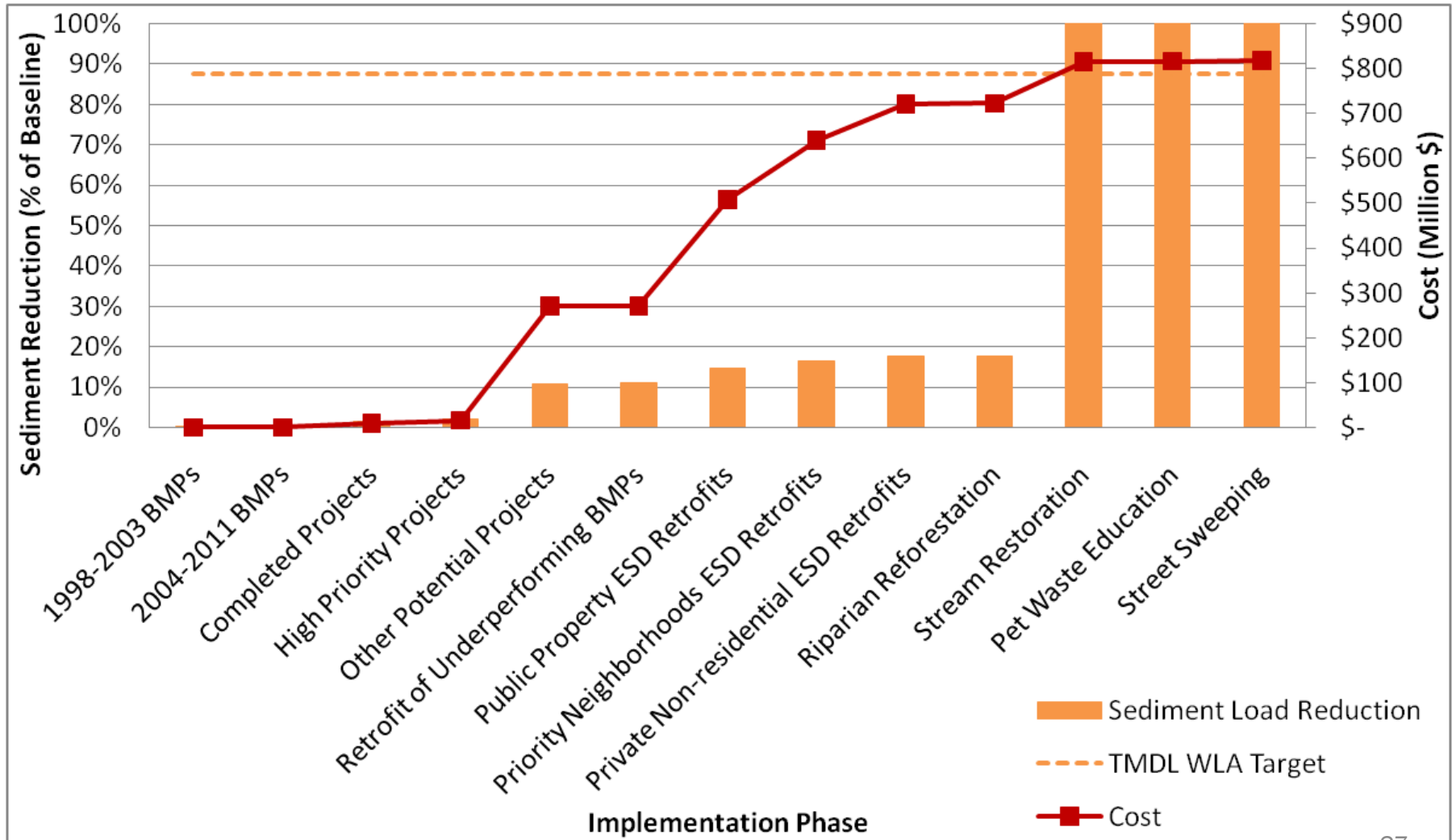
# Anacostia Nutrient TMDL: removal per unit cost

Most reduction per unit cost



Rank	Restoration Strategy	TN reduction	Incremental Cost	Unit Cost
		lbs/yr	Million \$	lbs/Million \$
1	Pet Waste Education	15,169	0.88	17,193
2	Retrofit of Underperforming BMPs	1,769	1.20	1,475
3	Stream Restoration	72,423	93.04	778
4	Completed Projects	6,643	9.48	701
5	High Priority Projects	3,260	6.35	513
6	Low Priority and Other Potential Projects	43,276	254.30	170
7	Habitat Restoration	224	1.41	158
8	Public Property ESD Retrofits	18,270	236.55	77
9	Priority Neighborhoods ESD Retrofits	9,271	132.78	70
10	Private Non-residential ESD Retrofits	5,594	80.18	70
11	Street Sweeping	-	1.24	-

# Anacostia Sediment TMDL: removal per Strategy



# Anacostia Sediment TMDL: removal per unit cost

Most reduction per unit cost



Rank	Restoration Strategy	Sediment reduction	Incremental Cost	Unit Cost
		tons/yr	Million \$	tons/Million \$
1	Street Sweeping	800	1.24	645
2	Stream Restoration	25,057	93.04	269
3	Retrofit of Underperforming BMPs	25	1.20	21
4	Completed Projects	97	9.48	10
5	High Priority Projects	47	6.35	7
6	Low Priority and Other Potential Projects	660	254.30	3
7	Public Property ESD Retrofits	272	236.55	1
8	Priority Neighborhoods ESD Retrofits	139	132.78	1
9	Private Non-residential ESD Retrofits	84	80.18	1
10	Habitat Restoration	2	1.41	1
11	Pet Waste Education	-	0.88	-

# Countywide Strategy: Implementation and Pollutant Reductions

## Countywide Watersheds

Summary of Implementation Plan schedule with expected MS4 permit area WLA compliance endpoints

	2015	2017	2020	2025	2030	Permit/ TMDL Targets 2017	Permit/ TMDL Targets 2020
<b>Impervious Area Treated (acres)</b>	4,302	6,014	7,722	10,518	11,154	6,008	7,723
<b>% of Impervious Area Treated by ESD</b>	18%	34%	47%	60%	63%		
<b>Impervious Area Treatment Cost (Million \$)</b>	305	622	987	1,687	1,884		
<b>% of Cost for ESD</b>	53%	66%	70%	80%	80%		
<b>Nitrogen (% Reduction)</b>	18%	25%	36%	46%	51%	9%	20%
<b>Phosphorus (% Reduction)</b>	17%	23%	34%	44%	46%	12%	34%
<b>Sediment (% Reduction)</b>	23%	34%	54%	60%	62%	20%	37%
<b>Bacteria (% Reduction)</b>	11%	15%	20%	28%	30%		
<b>Trash (% Reduction)</b>	18%	26%	33%	41%	42%		

*Assumptions:*

1. Does not include repeated Outreach and Education costs beyond FY2015
2. Does not include an inflation multiplier

NOTE: Subsequent to Strategy publication in February 2011, Maryland revised timelines for Bay TMDL targets to meet 60% implementation by 2017 and 100% implementation by 2025

# What did WTM not include?

- Secondary Sources
  - Channel Erosion
  - SSOs, CSOs, Septic (not applicable, WSSC)
  - Livestock (not applicable, NRCS)
  - Marinas (not applicable)
  - Road Sanding
  - Point Sources (not applicable)



# Challenges and Lessons Learned

- Sharpen your accounting pencils
- Sequential analysis is useful
- Target pollutants may require external analysis
- Non-structural strategies rely on limited research findings

# Challenges and Lessons Learned (MAST-related)

- MS4 permit area (acres)
- Land cover (impervious vs pervious)
- Pollutant Loadings and Total Loads
- BMP assumptions
  - Acres with some control
  - Type
  - Reduction Efficiency

# Questions?

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