Maryland
Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

May 2, 2022

Ms. Tara Morrison
National Park Service – National Capital Parks East
1900 Anacostia Drive SE
Washington, DC 20020

Dear Ms. Morrison:

The Maryland Department of the Environment, Water and Science Administration (Department) has completed a review of National Park Service (NPS) Suitland Parkway's Progress Report under the National Pollutant Discharge Elimination System (NPDES) General Permit No. 13-SF-5501 for Discharges from State and Federal Small Municipal Separate Storm Sewer Systems (MS4). The report reflects progress made to meet permit conditions during the period July 1, 2020 through June 30, 2021. The Department has determined that the submittal has partially met reporting requirements as outlined in the permit, but did not include a Work Plan or the requested information related to the Public or Personnel Involvement and Participation minimum control measure (MCM).

NPS Suitland Parkway's restoration target is 15 acres. NPS Suitland Parkway submitted a Restoration Activity Schedule that identified a potential stream restoration project that may achieve the restoration requirement. Results of the Department's review are provided as an attachment to this letter. Major comments include:

- NPS Suitland Parkway must provide an updated Work Plan in the year 4 Progress Report.
- NPS Suitland Parkway must make progress toward meeting the Public or Personnel Involvement and Participation MCM requirements, which include five public or personnel participation events within the permit term.

Please address all comments in the attachment in the next Progress Report due on October 31, 2022. The Department recognizes the significant effort necessary to implement a stormwater program and commends NPS Suitland Parkway for its commitment and progress to date. If you have any questions on this review, please contact me at Christina.Lyerly@Maryland.gov or 410-537-3546, or Nora Howard at Nora.Howard1@Maryland.gov.

Sincerely,

Christina Lyerly
Natural Resources Planner IV
Water and Science Administration

Attachment

National Park Service Suitland Parkway
Small Municipal Separate Storm Sewer System (MS4) Permit
Maryland Department of the Environment (Department) Review of
Fiscal Year (FY) 2021 MS4 General Permit Progress Report

Reporting

1. The National Park Service (NPS) Suitland Parkway submitted a complete Progress Report Form, a signature for the appropriate responsible personnel, and contact information. This information is required to be updated annually.
2. The next Progress Report is due on October 31, 2022 and must include Sections I and II of the Progress Report, updates to the impervious area restoration program, and responses to comments outlined below. Reporting on the minimum control measures (MCMs) in Section II must cover program activities for both years 3 and 4.
3. Resources related to MS4 program development and guidance for compliance with permit requirements are available on the Department's website at: https://mde.maryland.gov/programs/Water/StormwaterManagementProgram/Pages/NPDES_MS4_New.aspx

Section I: Impervious Area Restoration Reporting

4. NPS Suitland Parkway's restoration target is 15 acres. NPS Suitland Parkway submitted an acceptable Restoration Activity Schedule (RAS) that includes one stream restoration project which may achieve the restoration requirement. An updated RAS must be submitted annually.
5. If the stream restoration project is in the planning phase, it may be possible for NPS Suitland Parkway to achieve greater credit if the project meets the Chesapeake Bay Program stream restoration protocols, available at https://chesapeakestormwater.net/bmp-resources/urban-stream-restoration.
6. NPS Suitland Parkway submitted a list of 11 potential restoration projects (two new wet ponds and nine stream restorations) and a map identifying their locations. The Department commends NPS Suitland Parkway for identifying restoration opportunities.
7. NPS Suitland Parkway reported that options for funding to meet restoration requirements are being evaluated and an update on funded projects will be available in FY 2023. The Department encourages NPS Suitland Parkway to continue pursuing funding opportunities so that planned restoration can be achieved by 2025. The Department requests an update on progress in the year 4 Progress Report.
8. NPS Suitland Parkway did not provide an updated Work Plan with the Progress Report. In the year 2 Progress Report review, the Department requested that the Work Plan be updated and submitted annually to reflect adaptive planning to achieve the restoration requirement (see permit PART V.B). NPS Suitland Parkway must submit an updated Work Plan in the year 4 Progress Report.
9. NPS Suitland Parkway submitted an urban best management practice (BMP) database that includes the proposed stream restoration project. Once this project is constructed, the INSTALL_DATE will need to be completed.

MCM #2: Public or Personnel Involvement and Participation

10. In the year 2 Progress Report review, the Department commented that NPS Suitland Parkway must provide further information to meet MCM #2's requirements. NPS Suitland Parkway did not respond to this comment. NPS Suitland Parkway is required to hold five

public or personnel participation events during the permit term that focuses on stormwater management, water quality, and/or restoration. NPS Suitland Parkway must provide an update on the development of this MCM in the year 4 Progress Report.

Financial Information

11. NPS Suitland Parkway reported the cost for implementing the restoration program is $20,000 for contractor support. In the year 2 Progress Report, NPS Suitland Parkway reported a cost of $755,000. The Department requests that NPS Suitland Parkway include the total cost in the year 4 Progress Report.