Summary Evaluations of Local 2012-2013 Milestones

Introduction

The following explains the intent, scope and limitations of the 2013 local milestone evaluations. It also provides context for understanding the approach MDE took in assessing progress towards meeting local two-year programmatic milestone goals identified in the county-level Phase II WIP reports.

What is being evaluated?

Commitments & Achievements: This evaluation focuses on two-year programmatic milestone commitments established by local governments engaged in the Chesapeake Bay restoration. It considers a) whether the initial commitments were robust, and b) whether the original commitments were achieved, based on a review of the local milestones status reports. The categories used in the milestone evaluations are intended to capture the variety of programmatic activities that were generally reflected in the various County reports.

Programmatic vs. Implementation Milestones: There are two categories of milestones: Programmatic commitments and implementation actions. This evaluation focuses on the *programmatic* commitments, as BMP implementation is reported through a separate process each year for evaluation of progress assessed by the Bay watershed model. To acknowledge implementation milestone commitments and efforts noted in many of the County reports, a BMP Implementation category has been included in the evaluation table.

Local Government Functions: The evaluation focuses on pollution source sectors for which local governments have some degree of control: management of *stormwater, septic systems and wastewater treatment plants,* through strategies developed by local WIP teams. The agricultural sector is <u>not</u> part of the evaluation, as both near-term and long-term WIP goals and progress in this sector are managed by the Maryland Department of Agriculture and the county-based Soil Conservation Districts, with the active participation of Maryland's farming communities.

What is the purpose of the Milestone Evaluation?

Accountability: The 2-year Milestones are intended to promote continual, incremental progress toward a long-term goal by setting near-term commitments. The evaluation promotes accountability relative to this intent.

Constructive Feedback: The evaluation process includes communications between the State and local partners. This feedback process promotes bi-directional education of State and local parties involved in the Bay restoration process.

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Information Sharing and Transparency: Because the evaluations are shared among local jurisdictions, and with the general public, the lessons learned are also shared. The process also supports transparency of governmental activities related to Bay restoration.

What are some limitations of the Evaluation?

All Jurisdictions are Not Equal: Maryland's local jurisdictions included in the evaluation vary significantly in a variety of ways (e.g., location, amount of developed land). Consequently, although a single set of criteria was used in the evaluations, these underlying differences among jurisdictions should be considered when interpreting them.

Counties and Municipalities: One challenge of the Bay restoration process is identifying the parties with direct control over pollutant loads. Within the borders of most counties in Maryland, that control is shared between county and municipal government. Hence, although we routinely make reference to "the county," as if it's a single entity, it is often shorthand for an amalgam of the county and municipal governments as well as other partners. This insight is important to a balanced interpretation of the milestone achievements. (In some cases, separate county and municipality commitments were identified in the local milestone reports and are similarly delineated in the evaluations.)

A note on the ratings used in the Evaluation

Ratings of High, Medium and Low were assigned, first to signify the strength of the original milestone commitments in each category of programmatic activity, and secondly as a broad assessment of the progress achieved towards meeting each commitment. These two ratings for level of commitment and degree of progress were then weighed in setting the overall rating for each category or subcategory of activity.

In the categories of Legal Authority Enhancements and Contractor Support (a sub-category of Resource Enhancements), the term "None" is used where no commitments were made, on the assumption that enhancements in these areas are not essential for that particular jurisdiction. In addition, there are special circumstances where "None" is used because a rating was considered to be inappropriate, as in the following two examples:

- 1. A commitment to pursue a local ordinance is abandoned because a new State regulation renders the original milestone unnecessary;
- 2. No commitment is made to address wastewater treatment plants because upgrades to the local plants were completed prior to the milestone period.

Allegany County 2012-2013 Milestones Evaluation

The County¹ received "High" and "Medium" ratings in nearly all categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Progress that has been made in the stormwater sector should be built upon. More could be done in the septics system sector, though this is a relatively small source within the County. The wastewater treatment plant sector has been addressed by ENR upgrades completed prior to the milestone period. Follow-through on meeting commitments to resource enhancements should be reflected in future milestones. It is recognized that, due to Allegany County's distant location from the Bay and other factors, its impact on Bay water quality is relatively small.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	Medium	• High	• High
Enhancements			The rating reflects the numerous sources of funding acquired for multiple projects. Additionally, grant applications for the continuation of current projects have also been submitted.
Legal Authority	None	None	None
Enhancements			No commitments were made to enhance legal authorities to
(e.g., new ordinances)			increase water quality restoration capacity.
Organizational	• High	• High	• High
Enhancements			There has been a very high level of coordination among several
			organizations in an effort to enhance a variety of management
			strategies. Significant progress on tracking/reporting through the
			development and maintenance of a stormwater BMP database.
Planning/Studies	• High	• High	• High Significant planning efforts have been made to identify restoration opportunities, and conduct analyses to prioritize opportunities.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Public Engagement	• Low	• High	• High
			Although there was no reference to expanding public engagement
			opportunities in the original milestone commitments, numerous
			public engagement activities have taken place.
Addresses	Medium	Medium	Medium
Appropriate Sectors?			Programmatic efforts in the stormwater sector should be built
(Comprehensiveness)			upon and expanded. The septic systems sector has modest impact
			on the Bay. The wastewater treatment plant sector has been
			addressed by ENR upgrades completed prior to the milestone
			period.
BMP Implementation			Urban tree planting, stream restoration and abandoned mine
			reclamation are ongoing implementation efforts noted in the
			County's Programmatic Milestones status report. Some BMP
			implementation has exceeded the original milestone goals. The
			original milestone goals may have been set somewhat low. Final
			Programmatic Milestone achievements and BMP Implementation
			Progress for 2012-2013 are both presented in more detail in the
			"Final 2012-2013 Programmatic Milestones Report-Allegany
			<u>County"</u> document.

Anne Arundel County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Significant commitments were made in the stormwater, septic and wastewater sectors. Substantial progress was made; however, follow-through on many commitments, specifically in the areas of securing legal authorities and public engagement, should be reflected in future milestones.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	• High	• High	• High
Enhancements			Planning and approval for hiring 8 additional staff represents significant progress. The development of street sweeping contracts and the progress toward developing funding mechanisms are also reflected in the "High" rating.
Legal Authority Enhancements (e.g., new ordinances)	• High	• Medium	• Medium The County proposed significant commitments for enhancing legal authorities related to management of stormwater and onsite disposal systems (OSDS). Most commitments are pending ongoing planning activities.
Organizational Enhancements	• High	• High	• High Numerous thoughtful commitments were developed and pursued. The level of internal and external coordination was outstanding. Although many of the milestones were not met, this category is rated "High" in light of the large number of commitments and significant progress.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Planning/Studies	• High	• High	• High
			The quality and number of original milestones was high, reflecting
			strong commitment to ongoing and new planning initiatives and
			studies. In most cases these milestones were either met or
			surpassed.
Public Engagement	High	Medium	Medium
			Good milestone commitments were identified; however, progress
			has been modest.
Addresses	High	• High	• High
Appropriate Sectors?			Milestones reflect commitments that are comprehensive across the
(Comprehensiveness)			stormwater, septic and wastewater sectors.
BMP Implementation			The County provided a separate BMP implementation milestone
			progress report, detailing projects and practices designed, underway
			or completed between July 1, 2011 and June 30, 2013. The report is
			appended to the Anne Arundel County programmatic milestone
			status report on the MDE web site.

Baltimore City 2012-2013 Milestones Evaluation

Baltimore City received "High" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. The overall rating reflects acknowledgement of a large number of commitments to enhance stormwater program functions, even though achievement of many of those commitments remains in progress. The focus on stormwater reflects the facts that the City has very few septic systems and that wastewater upgrades are in progress. Public engagement efforts and follow-through on meeting unfulfilled commitments to organizational enhancements should be reflected in future milestones.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	• High	• High	• High
Enhancements			Commitments to add 3 FTEs, initiate a stormwater fee and increase
			consulting contract capacity represent significant resource
			enhancements.
Legal Authority	• High	• High	• High
Enhancements,			The commitment to adopt a stormwater fee and formal guidance
(e.g., new ordinances)			manuals represents significant enhancements.
Organizational	• High	• High	• High
Enhancements			Numerous commitments were made to organizational
			enhancements. Although many activities remain in development,
			the progress is rated "High" in light of the large number of
			commitments.
Planning/Studies	• High	• High	• High
			Although many planning activities and studies remain in
			development, the progress is rated "High" in light of the large
			number of commitments.
Public Engagement	• Low	• Low	• Low
			No public outreach or engagement milestones were identified.

Baltimore City 2012-2013 Milestones Evaluation

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Addresses	• High	• High	• High
Appropriate Sectors?			Only the stormwater sector warrants milestone commitments,
(Comprehensiveness)			because the City has very few septic systems and waste water plant upgrades are in progress. Although many stormwater milestone activities remain in development, the progress is rated "High" in light of the large volume of commitments.
BMP Implementation			Items identified in the <u>Baltimore City Milestones Status Report</u> as BMP Implementation Milestones are actually implementation <i>planning</i> initiatives and thus are included in this evaluation as programmatic milestones. The City's BMP implementation is submitted separately to MDE for annual progress reporting.

Baltimore County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. The stormwater sector has made good progress by enhancing organizational and planning functions. Significant commitments and progress were made in the septic system sector to enhance legal authorities, planning, tracking and public outreach. The wastewater sector is not addressed, as major treatment plant upgrades are in progress. Going forward, the original commitments to planning activities and studies that have not been completed should be reflected in future milestones.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	Medium	• High	• High
Enhancements			Significant progress is represented by the adoption of a stormwater
			remediation fee to generate funding.
Legal Authority	• High	High	• High
Enhancements			Septic connection legal mechanisms have been investigated and a
(e.g., new ordinances)			stormwater fund and fee system adopted.
Organizational	High	High	• High
Enhancements			Strong internal and external coordination. Good commitment
			toward the development and implementation of various
			tracking/reporting systems.
Planning/Studies	High	Medium	Medium
			Some of the original milestones have been achieved. A more robust
			commitment toward completing the remaining goals should be
			reflected in future milestones.
Public Engagement	Medium	Medium	Medium
			Outreach and education programs on septic pump-outs have been
			developed.

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Baltimore County 2012-2013 Milestones Evaluation

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Addresses	• High	High	• High
Appropriate Sectors?			The "High" rating in this category reflects the substantive quality of
(Comprehensiveness)			the initial goals. The stormwater and septic sectors are making
			progress. The wastewater sector is not addressed, as major
			treatment plant upgrades are in progress.
BMP Implementation			In its Phase II WIP, the County set 2-year reduction targets for urban
			stormwater and septic systems (wastewater and agriculture sectors
			are addressed separately). Good progress was reported toward
			meeting load reduction targets for urban stormwater; targets for
			septics exceeded. Final Programmatic Milestone achievements and
			BMP Implementation Progress for 2012-2013 are both presented in
			detail in the <u>Baltimore County 2014-2105 Milestones</u> document (pp.
			4-16).

Calvert County 2012-2013 Milestones Evaluation

The County¹ received a mix of "Medium" and "Low" ratings for the categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Good progress was made in the wastewater sector by acquiring funds for a WWTP upgrade. However, most of the original milestones were not met in the stormwater and septic sectors. Future milestones should reflect a more robust commitment toward these sectors. Additionally, there was inadequate progress on organizational and legal authority enhancements, as well as public engagement.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comment/Notes
Resource	Medium	Medium	Medium
Enhancements			Good progress was made to enhance funding, but no action was
			taken to address commitments to increase staff.
Legal Authority	• High	Medium	Medium
Enhancements			Good commitments were established. Formal consideration was
(e.g., new ordinances)			given to a stormwater fee, which is still under review.
Organizational	• Low	• Low	• Low
Enhancements			The two Tracking/ Reporting milestones were not achieved. Some
			coordination and tracking efforts were accomplished that were not
			identified in the original milestones.
Planning/Studies	Medium	Medium	Medium
			Planning for WWTP connections and stormwater retrofits shows
			good progress. Pursuit of an alternate strategy to developing sub-
			watershed WIPs should be reflected in future milestones.
Public Engagement	• Low	• Low	• Low
			Modest programmatic milestone was not met. A stronger
			commitment is needed in the future.

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Calvert County 2012-2013 Milestones Evaluation

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comment/Notes
Addresses	• High	• Low	• Low
Appropriate Sectors?			A more robust commitment toward milestone completion should be
(Comprehensiveness)			reflected in the future for the stormwater and septic sectors. Good
			progress on wastewater plants through the acquisition of funds for
			an ENR upgrade.
BMP Implementation			Final Programmatic Milestone achievements and BMP
			Implementation Progress for 2012-2013 are both documented in the
			"Draft Calvert County Watershed Implementation Plan Two-Year
			Milestone Report".

Caroline County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Significant progress has been made in the stormwater and septic sectors through strong multi-partnership coordination, planning and grant solicitation efforts. Although no milestones were identified for the wastewater treatment plant sector, the County and several municipalities have been involved in significant septic connection projects. Going forward, the original commitments to resource and organizational enhancements that have not been completed should be reflected in future milestones.

Review Subject	Original Commitment	Commitment Progress	Overall Rating, Comments/Notes
Resource Enhancements	• High	• High	High There has been an overwhelming commitment to securing funding for the planning, design and construction of multiple urban stormwater and septic projects. Numerous ongoing activities should be reflected in future milestones.
Legal Authority Enhancements (e.g., new ordinances)	None	• None	• None No commitments were made to enhance legal authorities to increase water quality restoration capacity.
Organizational Enhancements	• High	• High	• High Strong commitments were made to organizational enhancements, mainly through Internal and external coordination and new programs. Additional initiatives were completed in tracking and reporting, including land use refinements that were not part of the original commitments. Future milestones should reflect commitment to pursue program enhancements that were not met.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Planning/Studies	High	High	●High
			Numerous commitments were made to planning/ studies. The
			"High" rating is based on the large quantity of original milestone
			goals. Many of these goals were achieved.
Public Engagement	Medium	Medium	Medium
			There has been some public engagement in the form of public
			outreach meetings and mailing programs.
Addresses Appropriate	High	High	• High
Sectors?			Significant progress has been made in the stormwater and septic
(Comprehensiveness)			sectors through retrofit designs as well as planning for a BMP
			testing facility. No commitments to wastewater were identified.
BMP Implementation			Progress updates on BMP implementation milestones were not
			included in the County's "2012-2013 Milestones and Status
			Updates" report; however, numerous projects were referenced in
			descriptions of programmatic milestone progress.

Carroll County 2012-2013 Milestones Evaluation

The County¹ received "High" and "Medium" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Overall, the original commitments were fairly modest. The County has demonstrated close coordination with MDE on wastewater plant upgrades and with local municipalities on a variety of subjects. Moderate commitments and progress were made in the stormwater and septic system sectors. Opportunities remain for enhanced planning and public engagement commitments in future milestones.

Review Subject	Original Commitment	Commitment Progress	Overall Rating, Comments/Notes
Resource Enhancements	• Low	• High	• High Although no original commitments were identified, the addition of two staff positions combined with securing grants, and the funding of stormwater represent good progress.
Legal Authority Enhancements (e.g., new ordinances)	• Medium	• High	• High Modest activities acknowledged in relation to septic system legal authorities. Formalized County/municipal relationship to implement joint MS4 permit.
Organizational Enhancements	• Medium	• High	• High High ratings for internal and external coordination & tracking/ reporting are based on achieving the original commitments as well as completing additional goals not included in the County's original milestones.
Planning/Studies	• High	• Medium	• Medium Modest progress was reported on planning commitments.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Public Engagement	• Low	Medium	Medium
			Although no programmatic efforts were identified in the County's
			original milestones, public engagement is routinely offered for
			existing programmatic activities.
Addresses	High	• High	• High
Appropriate Sectors?			Milestones reflect commitments that are comprehensive across the
(Comprehensiveness)			stormwater, septic and wastewater sectors. Created septic upgrade
			tracking system. Hired two positions to support stormwater.
			Closely coordinating with MDE on wastewater plant upgrades.
BMP Implementation			County BMP implementation is submitted separately to MDE for
			annual progress reporting; thus, no implementation milestones
			were identified in the County's 2012-2013 Programmatic
			Milestones Status Update report.

Cecil County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in most categories of the 2012-2013 Milestones evaluation as summarized in the following table. Various evaluations of stormwater and septic system sectors are ongoing; outcomes of these studies should be reflected in future milestones.. Adoption of sewer rate increase is noteworthy in the wastewater sector.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	• High	• High	• High
Enhancements			Most original commitments have been met. County Council approval of higher wastewater user rates and major facility fees to increase revenue source for minor WWTP and septic connections represents significant resource enhancement. In cases where new funding was not acquired, there was a reallocation of existing resources to complete certain projects.
Legal Authority Enhancements (e.g., new ordinances)	• High	• High	• High County Council approved higher wastewater user rates and the major facility fee to increase revenue source for minor WWTP and septic connections. Ordinance evaluation, assessment and prioritization of opportunities for minor WWTP and septic connections are ongoing.
Organizational Enhancements	• High	• High	• High There has been significant coordination within the County, between Counties (Cecil and Harford) and with the state. State law and local health department policies are consistent for new and enhanced programs.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Planning/Studies	High	• High	• High
			Overall the commitment has been strong in this area. Despite not securing funding for watershed assessments, the county was able to conduct two assessments for prioritizing water quality improvement projects.
Public Engagement	• Low	Medium	Medium
			Despite not being explicitly stated in the milestone goals, the County
			has engaged in some public outreach events.
Addresses	High	• High	• High
Appropriate Sectors?			Milestones reflect commitments that are comprehensive across the
(Comprehensiveness)			stormwater, septic and wastewater sectors. Various evaluations of
			stormwater and septic system sectors are ongoing. Adoption of
			sewer rate increase is noteworthy in the wastewater sector.
BMP Implementation			Implementation milestones were identified in the Cecil County
			Milestones Report for the septics sector (40 BAT installations
			annually). This milestone goal was exceeded (103 total BAT systems
			installed in FY12 & FY13).

Charles County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Progress was made in all three major sectors (stormwater, septics and wastewater) through WWTP upgrade approval, plans for increased septic connections to WWTPs and planning for additional stormwater retrofit projects. Follow-through on the original commitments that have not been completed, particularly in the area of public engagement, should be reflected in future milestones.

Review Subject	Original Commitment	Commitment Progress	Overall Rating, Comments/Notes
Resource	• High	• High	• High
Enhancements			The County succeeded in securing multiple sources of funding for various projects and adopted a stormwater fee system that was not originally identified as a Milestone commitment. A preferred BMP list was created through contractual services.
Legal Authority Enhancements (e.g., new ordinances)	• Low	• Medium	• Medium In FY13, the County adopted the Watershed Restoration and Protection Fund to implement stormwater and wetland restoration and protection projects.
Organizational Enhancements	• High	• High	• High Most original milestones have been completed with significant progress on tracking/reporting and program enhancements.
Planning/Studies	• High	• High	• High Charles County has completed its Phase II WIP Strategy and other plans, which are well integrated in support of WIP implementation.

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Review Subject	Original Commitment	Commitment Progress	Overall Rating, Comments/Notes
Public Engagement	Medium	• Low	• Low
			Although modest commitments were made for a public outreach
			plan, no update has been provided on its status.
Addresses	High	• High	• High
Appropriate Sectors?			Upgrades to Municipal Wastewater Treatment Plants and numerous
(Comprehensiveness)			stormwater retrofit projects display significant progress. Most of the
			original commitments have been met.
BMP Implementation			Stormwater and wastewater BMP implementation milestones
			identified in the County's 2012-2013 Programmatic Milestone Final
			Report were accomplished.

Summary of Garrett County's "Status Report of 2013 Milestone"

As stated in the <u>Garrett County Milestone Status Report</u>, the delivery factor for Garrett County is very small; that is, less than 10% of the nitrogen entering surface water in Garrett County reaches the main stem of the Bay. The reductions that might be achieved by septic connections, septic denitrification and septic pumping were judged not to be economically feasible because the cost of these BMPs is very high compared to the realized reductions. However, to date, ten systems utilizing Best Available Technology for nitrogen reduction have been upgraded or replaced in the Garrett County portion of the Bay Watershed (nine with grant money and one without). The County's selected WIP Strategy is to rely on erosion and sediment control on extractive land to achieve the desired nutrient and sediment reductions. By implementing this strategy, and with reductions achieved by Agriculture, the County expects to achieve its 2017 and 2025 targets without reductions from other sectors.

<u>Consequently, Garrett County has not developed any 2012 – 2013 milestones and cannot generate a report on the progress of these milestones</u>. The County is relying on implementing Erosion and Sediment Control plans as described in existing Maryland regulations in COMAR 26.21.01.10, to achieve the desired reductions. Additionally, milestones for Abandoned Mine Reclamation have not been created. Existing Maryland regulations at COMAR 26.21.01.16 require that, unless the permittee provided a detailed explanation why site-specific factors prevent it, the permittee must begin reclamation activities as soon as practicable after mining starts, continuing concurrently with mineral extraction and, upon termination of mining, until the entire permit area is reclaimed. Garrett County believes that State enforcement of this regulation is sufficient to ensure that reclamation occurs and permitting requirements are met.

Harford County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. The stormwater sector has met some of its numerous original goals. A higher completion rate should be pursued and reflected in future milestones. The septic and wastewater sectors have made significant progress through the enhancement of tracking and planning functions.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	• High	 High 	• High
Enhancements			Many of the original commitments to resource enhancements have
			been initiated and are ongoing. The County was awarded an
			additional grant not mentioned in the original milestones.
Legal Authority	• High	Medium	Medium
Enhancements			Although the milestone has not been completed, some progress has
(e.g., new ordinances)			been made with respect to developing a stormwater fee structure.
Organizational	• High	• High	• High
Enhancements			Multiple coordination efforts to advance projects have been
			initiated by the County and municipalities of Bel Air and Havre de
			Grace, among one another and with SHA, MDE and the Center for
			Watershed Protection (Havre de Grace). Good progress on
			tracking/reporting and development of a tree planting program that
			was not part of original goals.
Planning/Studies	• High	• High	• High
			Most of the original milestones have been achieved. In some cases,
			milestones have been surpassed. The "High" rating in this category
			is also indicative of the quantity of strong original commitments.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Public Engagement	• Low	High	• High
			Although no original milestones were identified, multiple public
			outreach efforts have been successfully undertaken.
Addresses	High	• High	• High
Appropriate Sectors?			The rating reflects the good quality and quantity of the initial goals.
(Comprehensiveness)			The stormwater, septic and wastewater sectors are making
			progress.
BMP Implementation			In its Phase II WIP, the County set 2-year reduction targets for urban
			stormwater and septic systems. Harford County has made a strong
			commitment to implementing BMPs, particularly in the areas of
			restoration, wastewater treatment plant upgrades and septics. The
			City of Aberdeen continues to implement BMP activities. Final
			Programmatic Milestone achievements and BMP Implementation
			Progress for 2012-2013 are both presented in more detail in the
			"Harford County Phase II Watershed Implementation Plan 2012-
			2013 Two-Year Milestones" document.

Howard County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in all categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Most of the progress was made in the stormwater sector. More effort in the septic systems sector should be reflected in future milestones. No progress updates have been provided for the wastewater sector, for which the only major plant has already been upgraded.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	• High	• High	• High
Enhancements			The commitment to a stormwater fee in advance of the State
			stormwater law was outstanding. The original septic system funding
			commitment reflected local resources would be sought as an
			incentive to system owners; no progress made on that commitment.
Legal Authority	• High	• High	• High
Enhancements			New local authority to establish stormwater fund and fee rate
(e.g., new ordinances)			represents significant progress.
Organizational	• Low	• High	• High
Enhancements			Although no explicit commitments were included in the original
			milestones, progress has been made on tracking/ reporting,
			coordination & program enhancements. Additionally, the County-wide
			Implementation Strategy (CIS) identified necessary organizational
			changes. Development of these milestones, in totality, represents
			significant progress.
Planning/Studies	• High	• High	• High
			The Countywide implementation Strategy, and various stormwater
			planning activities, represent significant progress.

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Public Engagement	High	High	• High
			Significant commitments to public engagement. Commitment
			progress meets or exceeds original milestones.
Addresses Appropriate	• High	• High	• High
Sectors?			All appropriate sectors were addressed by the milestones. The septic system
(Comprehensiveness)			sector deserves greater attention in the future. The County has only one
			major WWTP, which has been upgraded.
BMP Implementation			Multiple plans are in place to maintain current programs and initiate
			new projects. The County's 2012-2013 Programmatic Milestones
			Progress Status Report indicates that progress is reported through
			MS4 permit Annual Reporting, which is consistent with guidance
			provided to local jurisdictions.

Kent County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Significant progress was made in the stormwater and wastewater sectors through site and BMP identification, and WWTP upgrade plans. Less progress was made in the septic sector; however, there has been significant BMP implementation.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	High	High	• High
Enhancements			The utilization of acquired funds and contractor support for
			restoration projects represents significant progress. However a
			more complete pursuit of the original funding goals may be needed
			in the future.
Legal Authority	None	Medium	Medium
Enhancements,			Although no original milestones were identified, existing ordinances
(e.g., new ordinances)			for stormwater, sediment control and floodplain management were
			updated.
Organizational	• High	• High	• High
Enhancements			Organizational enhancements are reflected in the coordination of
			multiple cooperative initiatives, particularly among municipalities
			and non-governmental organizations, and in efforts to develop a
			tracking and reporting system.
Planning / Studies	High	Medium	• High
			Although many activities remain in development, the progress is
			rated "High" in light of the large number of project planning
			commitments identified.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Public Engagement	Medium	• High	• High
			The original milestone for outreach and education to property
			owners has been met. Public engagement via the TMDL committee
			and other partnerships is significant.
Addresses	High	High	• High
Appropriate Sectors?			The rating reflects the good quality of the initial goals. The
(Comprehensiveness)			stormwater and wastewater sectors are making progress.
			Programmatic efforts in the septic systems sector are modest but
			some upgrades and connections are being implemented.
BMP Implementation			Implementation progress is occurring in both the County and the
			municipalities through wetlands restoration projects, stormwater
			BMPs and septic upgrades, as reported in the Kent County Final
			Programmatic Report.

Montgomery County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. The commitments in the stormwater sector were comprehensive, addressing a range of programmatic enhancements. The stormwater sector met many of its original goals and received "High" ratings in every category. Commitments that have not been completed and are ongoing should be reflected in future milestones. No milestones or progress were reported for the septic system sector. A commitment to address this sector should be articulated in future milestones. Upgrades of wastewater plants have been completed or are under construction.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comment/Notes
Resource	• High	• High	• High
Enhancements			Funding enhancements were pursued, several successfully, by both
			the County and municipalities. A commitment to project
			enhancements is reflected in contractor activities and increased
			staffing.
Legal Authority	High	High	High
Enhancements			Rating reflects ongoing effort by Gaithersburg to implement a City-
(e.g., new ordinances)			administered stormwater fee, and the County's adoption of Bill 34-
			12, providing incentives for property owners to install stormwater
			practices.
Organizational	High	• High	• High
Enhancements			Multiple coordination efforts to advance projects have occurred
			between the county, Montgomery Parks and other agencies.
			Milestones to enhance tracking and reporting were achieved. A
			commitment has also been demonstrated to augment staff training
			and the Rainscapes Reward Program.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comment/Notes
Planning/Studies	High	 High 	• High
			Most of the original milestones have been achieved. In some cases,
			milestones that were not part of the original goals have been
			successfully developed and executed. The "High" rating is also
			indicative of the original commitments toward prioritization,
			restoration and assessment activities.
Public Engagement	• Low	High	• High
			Although no milestones were identified, a number of outreach and
			education activities have been conducted and several programs
			intended to engage the public have been implemented.
Addresses Appropriate	Medium	Medium	Medium
Sectors?			The rating balances the significant milestone commitments and
(Comprehensiveness)			progress in the stormwater sector with a lack of commitment in the
			septics sector, which should be addressed in future milestones.
BMP Implementation			Final Programmatic Milestone achievements and BMP
			Implementation Progress for 2012-2013 are both presented in more
			detail in the <u>"Montgomery County MS4 Permittees Chesapeake Bay</u>
			WIP Milestones and Progress" document.

Prince George's County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in most categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Overall, the original commitments were fairly robust. The County has demonstrated close internal coordination in a number of areas. Similarly, there was good progress towards enhancing legal authority. Strong commitments and progress were made in the stormwater sector. Moderate commitments were made in the septic systems sector but progress was not fully accomplished. Follow-through on the septics sector commitments should be reflected in future milestones. No progress updates have been provided for the wastewater sector, for which upgrades at major plants are either underway or completed.

Review Subject	Original Commitment	Commitment Progress	Overall Rating, Comments/Notes
Resource Enhancements	• High	• High	• High Very strong progress was made through grant/funding acquisitions, contractor support and budgetary planning for the hiring of additional staff.
Legal Authority Enhancements (e.g., new ordinances)	• High	• High	• High Legislation was adopted that provides additional funding for restoration and retrofit programs. Regulations for maintenance guidance of OSDS and nutrient reduction systems were introduced, but were put on hold.
Organizational Enhancements	• High	• High	• High Significant progress in all aspects of organizational enhancements, particularly through coordination and tracking/reporting. Several programs, such as "The Stormwater Benefits Program" have been developed, or are in the process of being developed.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Planning/Studies	• High	• High	• High Considerable progress has been made on most milestones. Milestones that were not met were still addressed and plans are in place for future progress.
Public Engagement	• Low	• High	• High While no commitments to public engagement were identified in original milestones, the County has since created a new agency division with a specific mission to provide outreach and education to local communities.
Addresses Appropriate Sectors? (Comprehensiveness)	• High	• High	• High Overall "High" rating is based on significant progress in the stormwater sector and some progress on strong milestones in the septics sector. No milestones were set for wastewater plants, as ENR upgrades to major plants are either underway or complete.
BMP Implementation			While County BMP implementation is submitted separately to MDE for annual progress reporting, some implementation progress was included in the <u>Prince George's County 2-Year Milestones Report</u> . It is acknowledged that numerous BMP implementation projects have been completed, including septic upgrades, stormwater retrofits and various restoration projects.

Queen Anne's County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in all categories of the 2012-2013 Milestones evaluation, as summarized in the following table. The County Milestones reflect a systematic approach. Although some progress was made in the stormwater sector, most of the progress occurred in the septic and wastewater sectors. Going forward, the original commitments to ongoing legal authority enhancements in the septics sector should be reflected in future milestones. More robust milestones regarding the stormwater sector should be set in the future. Opportunities also remain for program enhancements.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	 High 	 High 	• High
Enhancements			Significant commitments were set to secure grant funding. Progress
			exceeded the original commitments and enabled staffing
			enhancements.
Legal Authority	 High 	• High	• High
Enhancements			New ordinances have been adopted to ensure septic upgrades and
(e.g., new ordinances)			ordinance reviews for stormwater, sediment and erosion control are
			complete. Moderate commitment was made to ongoing septic
			pump-outs.
Organizational	• High	• High	• High
Enhancements			Significant investments were made in coordination across many
			sectors. Notable progress was made in developing and populating a
			new project tracking system. Effort was also made toward program
			development and enhancements, although the outcomes were
			limited.

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Review Subject	Original Commitment	Commitment	Overall Rating, Comments/Notes
Planning/Studies	High	Progress High	
Flaming/Studies	• nign		• High Good progress through the creation of a project tracking spreadsheet
			and the initiation of a study to evaluate the impacts of a community
			sewer and water service. All commitments could not be completed
			due to a lack of county resources.
Public Engagement	High	• High	• High
			Development of several outreach projects demonstrates good
			progress in this area.
Addresses	• High	• High	• High
Appropriate Sectors?			A strong commitment to the original goals was demonstrated based
(Comprehensiveness)			on legal enhancements, public engagement and planning
			accomplishments. Notably, this includes septic BNR requirements, as
			well as ongoing pump-outs. Moderate commitment to review of the
			County's Stormwater Management Ordinance.
BMP Implementation			Implementation progress has been made through the completion of
			stormwater retrofits, septic upgrades and restoration projects, as
			reported in the County's "Phase II WIP 2012-2013 Milestones
			<u>Update</u> ".

Somerset County 2012-2013 Milestones Evaluation

The County¹ received ratings ranging from "Low" to "High" in the 2012-2013 Milestones evaluation, as summarized in the following table. Progress has been made in the stormwater sector with high marks for planning associated with identifying potential retrofit sites. Although modest programmatic commitments in the septic systems sector were not achieved, it is acknowledged that implementation progress has occurred through system upgrades. Municipal waste water treatment upgrades are on track. Going forward, a more robust commitment to setting and achieving programmatic milestones is needed in order to build capacity for making more substantive progress.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	• High	Medium	Medium
Enhancements			The grant for project identification is very positive. Effort to follow up on this and more effort toward securing resources to meet septic system reduction obligations should be reflected in future milestones.
Legal Authority	None	None	None
Enhancements			No commitments made to enhance legal authorities to increase
(e.g., new ordinances)			water quality restoration capacity.
Organizational	Medium	Medium	Medium
Enhancements			Although most of the original milestones in this category were met,
			too few original milestones were identified.
Planning/Studies	Medium	• High	• High
			Most of the Planning/Studies that have been completed address channel restoration and stormwater retrofits. A large number of retrofit concepts were developed.

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Public Engagement	Medium	• Low	• Low
			No progress was reported on original commitment to conduct public
			outreach and education on septic pumping.
Addresses Appropriate	• High	Medium	Medium
Sectors?			Milestones reflect commitments that are comprehensive across the
(Comprehensiveness)			stormwater and wastewater sectors. The septic system sector
			commitment was not addressed. Municipal waste water treatment
			upgrades are on track.
BMP Implementation			Implementation actions were identified as septic upgrades,
			restoration activities, street sweeping and stormwater retrofits.
			Programmatic Milestone achievements and BMP Implementation
			Progress for 2012-2013 are both presented in detail in the
			"Somerset County 2012-2013 Programmatic Milestones Final
			Report."

St. Mary's County 2012-2013 Milestones Evaluation

The County¹ received "High" and "Medium" ratings in most categories of the 2012-2013Milestones evaluation, as summarized in the following table. For the stormwater sector, progress was made primarily in planning and design activities. Limited progress was made in the septic sector. This includes the completion of funding activities that were not part of the original goals. A contract for the Marlay Taylor ENR upgrade was awarded, thereby demonstrating significant progress in this sector.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	 High 	• High	• High
Enhancements			An NFWF grant was obtained that was not part of the original
			milestone goals. Good contractor support.
Legal Authority	None	None	None
Enhancements			No commitments made to enhance legal authorities to increase
(e.g., new ordinances)			water quality restoration capacity.
Organizational	• High	High	• High
Enhancements			Good commitments to coordination and tracking/reporting.
			Progress was also made in developing a stormwater inspection
			program. Good initial progress in program enhancements through
			the expansion of the street sweeping program.
Planning/Studies	• High	• High	• High
			Good progress has been made through the design completion of 15
			projects, as well as the cost/benefit and design work for retrofits of
			75 facilities.
Public Engagement	Medium	• High	• High
			While there were no specific public engagement plans mentioned in
			the original milestones, multiple plans have been initiated

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
			addressing conservation planning, septic upgrades and coastal
			reforestation.
Addresses	Medium	High	• High
Appropriate Sectors?			Milestones reflect commitments that are comprehensive across the
(Comprehensiveness)			stormwater and wastewater sectors, particularly through
			stormwater retrofit planning and an ENR upgrade to Marlay Taylor
			WRF. Progress was made beyond the initial goals in the septic sector
			through the acquisition of funding for 83 septic upgrades.
BMP Implementation			Implementation accomplishments that were reported in the <u>St.</u>
			Mary's County 2012-2013 Milestone Report include stormwater
			management projects and an ENR upgrade for Marlay Taylor Water
			Reclamation Facility.

Talbot County 2012-2013 Milestones Evaluation

The County¹ received a mix of "High", "Medium" and "Low" ratings for the categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Good progress was made in the stormwater and septic sectors through planning and funding activities. No milestones were identified for the wastewater sector. However, plans are being developed to utilize the available WWTP nutrient cap. A commitment to public engagement should be reflected in future milestones.

Review Subject	Original Commitment	Commitment Progress	Overall Rating, Comments/Notes
Resource	• High	• High	High
Enhancements			The "High" rating is based on the strong commitment to securing funding for upgrading septic systems and connections. Other sub- categories in Resource Enhancements were not addressed. These present an opportunity for development in future milestones.
Legal Authority	None	None	None
Enhancements			No commitments were made to enhance legal authorities to
(e.g., new ordinances)			increase water quality restoration capacity.
Organizational Enhancements	• High	• High	• High Good commitment to all sub-categories in Organizational Enhancements. All milestones have been met, and additional progress has been made through coordination with several towns, efforts which were not part of the original goals.
Planning/Studies	• High	Medium	• Medium A few high quality commitments were made. However, some goals were not accomplished or reported on. Goals that have been

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
			completed represent steady progress. This category provides a good
			opportunity for future development.
Public Engagement	• Low	• Low	• Low
			No commitments made to enhance public engagement activities.
Addresses	High	High	• High
Appropriate Sectors?			Good progress has been made in the stormwater and septic sectors
(Comprehensiveness)			through BMP and restoration planning, as well as through acquiring
			funding for septic system upgrades and planning for connections to
			WWTPs. A commitment is made to maintain a high level of WWTP
			efficiency.
BMP Implementation			Final Programmatic Milestone achievements and BMP
			Implementation Progress for 2012-2013 are both presented in
			more detail in the "Revised Two-Year TMDL Milestones: Progress
			and Proposed 2015 Milestones Talbot County Maryland"
			document.

Washington County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings in nearly all categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Significant progress was made in the stormwater, septic and wastewater sectors. This is demonstrated by the development of retrofit plans, initiating septic investigations and design plans for a WWTP ENR upgrade. In some cases, such as planning/studies and public engagement, the overall rating reflects acknowledgement of the large number of commitments to enhancing these areas.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	• High	• High	• High
Enhancements			Significant commitments to fund implementation and restoration
			projects, as well as contractor support for additional projects.
			County added one FTE to manage local watershed and WIP
			efforts.
Legal Authority	• High	None	Medium
Enhancements			Proposed local actions on septic requirements were not pursued,
(e.g., new ordinances)			as State regulations are now in force. Original milestones
			demonstrate local commitment to address septics sector.
Organizational	• High	• High	• High
Enhancements			Outstanding commitment to internal/ external coordination.
			Strong goals have been set for tracking and reporting. Most of the
			new programs/program enhancements are being actively
			pursued, particularly expansion of municipal street sweeping
			programs.
Planning/Studies	• High	• High	• High
			Although some of the proposed planning projects have not been
			finished, there has been an overwhelming commitment to

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Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
			pursuing and completing numerous planning and restoration
			projects, reflected in part by the large number of original goals.
Public Engagement	• High	• High	• High
			Many of the original public engagement goals have been met.
			Given the large number of original goals, this still represents
			significant progress on original commitments.
Addresses	High	• High	• High
Appropriate Sectors?			Considerable attention has been focused on the stormwater,
(Comprehensiveness)			septic and wastewater sectors. This is evidenced by a multitude of
			retrofit plans, septic investigations and the initiation of design
			plans for a WWTP ENR upgrade.
BMP Implementation			There has been a significant commitment to BMP
			Implementation. Most of the progress has occurred through
			stormwater restoration and septic upgrade projects. Final
			Programmatic Milestone achievements and BMP Implementation
			Progress for 2012-2013 are both presented in more detail in the
			"Washington County WIP Milestone Progress Report".

Wicomico County 2012-2013 Milestones Evaluation

The County¹ received "High" ratings for most the categories of the 2012-2013 Milestones evaluation, as summarized in the following table. Progress on building stormwater management capacity via initial steps toward a system of fees is promising. Progress on modest commitments for the septic system sector is positive; however, more attention to this sector should be reflected in future milestone commitments. Upgrades are underway in the wastewater sector.

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Resource	• High	• High	• High
Enhancements			Original commitments to contractor support and funding have been
			achieved. Although not identified as a milestone, staffing increases
			have been realized.
Legal Authority	• None	Medium	• Medium
Enhancements			Efforts made to pursue amendments to State statute governing the
(e.g., new ordinances)			Bay Restoration Fund uses.
Organizational	• High	• High	• High
Enhancements			There has been a strong commitment to internal and external
			coordination. Development of an urban tree program shows good
			progress. More attention could be given to program enhancements
			and tracking/reporting.
Planning/Studies	• High	• High	• High
			The County has engaged in numerous planning projects to meet the
			original milestones.
Public Engagement	• Low	Medium	• Medium
			Although no commitment to public engagement was made, there
			have been efforts to encourage outreach and education.

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Wicomico County 2012-2013 Milestones Evaluation

Review Subject	Original	Commitment	Overall Rating,
	Commitment	Progress	Comments/Notes
Addresses	Medium	• High	• High
Appropriate Sectors?			The rating reflects important efforts in all three urban/suburban
(Comprehensiveness)			sectors.
BMP Implementation			Street sweeping programs and upgrades to ENR for wastewater treatment plants in Fruitland and Delmar are implementation activities cited in the <u>Wicomico County Programmatic Milestones</u> report.

Summary of Worcester County's Status Report of 2012 - 2013 Milestones

The original two year milestones, as discussed in section V of Worcester County's Phase II WIP, are solely expressed in terms of implementation milestones. Consequently, <u>Worcester County's progress report update</u> consisted mainly of implementation milestones. Despite the report lacking in programmatic milestone progress, the County appears to be making good progress toward achieving its implementation goals. Two of the three original implementation goals were met (for the stormwater and septic sectors), while ENR upgrades (wastewater) for the towns of Snow Hill and Pocomoke City were completed. Some programmatic milestone progress was expressed through coordination efforts between the County and The Nature Conservancy (TNC) in exploring BMP locations on TNC land and also BMP locations within Worcester County's Chesapeake Bay watershed to install BMPs/target funding for restoration and nutrient reduction activities.