



Maryland

Department of the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

May 2, 2022

Mr. Charles Cuvelier
National Park Service
700 George Washington Memorial Parkway
McClellan, VA 22101

Dear Mr. Cuvelier:

The Maryland Department of the Environment, Water and Science Administration (Department) has completed a review of the National Park Service (NPS) George Washington Memorial Parkway's (GWMP) 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.

GWMP's restoration target is 9.5 acres. GWMP submitted a Restoration Activity Schedule that identified two potential stream restoration projects that may achieve the restoration requirement. Results of the Department's review are provided as an attachment to this letter. Major comments include:

- GWMP must provide an updated Work Plan in the year 4 Progress Report.
- GWMP must continue to annually submit the Restoration Activity Schedule to reflect updates to proposed projects.

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 GWMP 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,

A handwritten signature in black ink that reads "Christina Lyerly".

Christina Lyerly
Natural Resources Planner IV
Water and Science Administration

Attachment

**National Park Service – George Washington Memorial 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) George Washington Memorial Parkway (GWMP) 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. GWMP's restoration target is 9.5 acres. GWMP submitted an acceptable Restoration Activity Schedule (RAS). The RAS includes two stream restoration projects which may achieve the restoration requirement. An updated RAS must be submitted annually.
5. If the stream restoration projects are in the planning phase, it may be possible for GWMP to achieve greater credit if the projects meet the Chesapeake Bay Program stream restoration protocols, available at <https://chesapeakestormwater.net/bmp-resources/urban-stream-restoration>.
6. GWMP provided a link to NPS's Planning, Environment, and Public Comment website, which provides the Environmental Assessment of the proposed stream restoration projects for public review. GWMP 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 GWMP 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.
7. GWMP 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). GWMP must submit an updated Work Plan in the year 4 Progress Report.
8. GWMP's property does not have best management practices (BMPs) onsite. Once projects are completed, GWMP must submit a BMP database for the Department's review.

Financial Information

9. GWMP reported the cost for implementing the restoration program is \$20,000 for contractor support. In the year 2 Progress Report, GWMP reported a cost of \$318,000. The Department requests that GWMP include the total cost in the year 4 Progress Report.