

Clean Water Action
Anacostia Watershed Society
Anacostia Watershed Citizens Advisory Council
Friends of Briers Mill Run
Sierra Club – Maryland Chapter
Audubon Naturalist Society

Mr. Brian Clevenger

June 27, 2013

Maryland Department of the Environment via email: bclevenger@mde.state.md.us
Sediment, Stormwater and Dam Safety Program
1800 Washington Boulevard
Baltimore, MD 21230

Re: Comments on Draft MS4 Permit No. 11-DP-3314 / MD0068284 for Prince George's County, Maryland

Dear Mr. Clevenger:

On behalf of our 4,000 members who live in Prince George's County and our allies who have signed on to this letter, Clean Water Action ask that the Maryland Department of the Environment and County Council approve a strong municipal separated stormwater sewer system (MS4) permit for Prince George's County. Economic development is important, and a strong MS4 permit can mean profits and economic growth while investing in the restoration of the County's natural resources. Prince George's County is on the brink of creating thousands of jobs through green investments, all while increasing the quality of life. A strong stormwater permit will facilitate this opportunity to invest in green, healthy, and prosperous neighborhoods.

A renewed stormwater permit (MS4), required under the federal Clean Water Act and issued by the State of Maryland, will require the retrofitting of 8000 acres of hard, paved surfaces by 2018. To meet this new mandate, a new stormwater utility fee will provide funding for projects like tree plantings, rain gardens, green roofs, and other innovative water management projects to ease compliance with the permit. These projects create long and sustainable jobs for local people. As a recent report on green stormwater jobs in the Chesapeake Bay noted, *“Leveraging existing municipal resources and collaborating with community groups can expand training and certification programs that can ultimately lead to employment and business opportunities for people with applicable skills to maintain green infrastructure.”* (American Rivers and Green For All, 2013).

An effective Prince George's County MS4 permit will help the state reach its TMDL implementation plan, but only through clear and attainable milestones. This will hold us all accountable for reducing pollution to the Anacostia, Potomac and Patuxent Rivers. Stricter monitoring is needed to track and report out progress in cleaning our streams and greening our

neighborhoods. It is simply not enough to monitor a single stream throughout the year to determine whether the quality of water throughout the county and watersheds are meeting local, state and federal standards. To meet these standards, the county needs to incentivize *green* retrofits. Green stormwater retrofits will plant thousands of trees in our communities, along with green roofs and rain gardens. Casey Trees' 2010 fact sheet on Green Business Districts reported: *"Several studies have found that people are willing to travel farther, visit more frequently and pay more for goods and services in business districts with trees – on average 12 percent more.1,2 Similar studies have concluded that the amount of time that someone stays in a store is longer if trees and landscaping are present on the streets and surrounding areas."* (Casey Trees' [Green Issue Briefs](#), 2010).

In order for us to accomplish these goals in the permit, Prince George's County needs a strong and effective stormwater utility fee. All property owners should pay their fair share for their hard, paved surfaces that cause runoff. Areas with more trees, green roofs, and rain gardens, will be able to capture more runoff and thus reduce downstream flooding from many storms. Prince George's County should not outsource the core stormwater utility functions, operations, and computer models. These need to be done in-house by well-trained and accountable Prince George's County - Department of Environmental Resources staff. With this comes transparency. Regular reports on the structure, function, revenues, problems and their solutions need to be published for inclusive transparency. The reports will be successful when we focus on *green* investments, not gray ones.

We applaud Prince George's County officials' commitment to an all-green stormwater retrofit program and we look forward to partnering with Prince George's leaders to bring this commitment to fulfillment. We have been fortunate to meet with them and are pleased with their openness and collaboration. By adopting a strong stormwater utility fee, Prince George's County can fund projects that satisfy the proposed changes to the Stormwater Permit (MS4). Prince George's County can lead the state in stormwater management, green communities and job opportunities. This is important to help our economies and communities grow.

Respectfully,

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Chesapeake Program Organizer, Clean Water Action

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