



PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

962 Wayne Ave • Suite 610 • Silver Spring, MD 20910

July 12, 2024

Stewart Comstock
Maryland Department of the Environment
Water and Science Administration
1800 Washington Blvd.
Baltimore, MD 21230

RE: PEER Comments on NPDES MS4 Permit for MDOT SHA, NPDES Permit Number MD0068276, MDE Permit Number 24-DP-3313

Dear Mr. Comstock:

My name is Tim Whitehouse and I am a former senior enforcement attorney with the U.S. Environmental Protection Agency and I am currently the Executive Director of Public Employees for Environmental Responsibility (PEER). On behalf of PEER, I am registering our complete opposition to the inclusion of stream “restoration” projects as an approved management practice to be used by the Maryland Department of Transportation (MDOT) State Highway Administration (SHA) to receive credits toward their required stormwater pollutant load reductions in their new Municipal Separate Storm Sewer System (MS4) permit.

PEER’s opposition is based upon three major concerns:

- These projects that are misnamed stream “restoration” are ecological travesties which fail to improve water quality, stabilize stream banks or enhance the ecological function ing of the affaaected waterbodies;
- The Maryland Department of the Environment (MDE), ahs not shown itself capable of conducting responsible oversight of these projects to prevent needless and severe adverse impacts from these projects on both the existing ecosystems and neighboring residential communities; and
- The complete absence of required monitoring to ensure that these projects actually achieve promised environmental improvements or benefits.

Thank you for considering these comments in your evaluation of SHA’s proposed MS4 permit.

Sincerely,

Timothy Whitehouse
Executive Director, PEER
