My name is Brian England, I am a board member of the Howard County Citizens Association.

I was chair of the Columbia Association Watershed Advisory Committee and was on the committee that selected the vendor who wrote the **Columbia Watershed Management Plan**.

Over these years I have seen many so called "restoration projects" implemented that have been counterproductive and failed to "protect and enhance the environment". Millions of dollars have literally been washed down the drain.

This has been coupled with little to no effort put into addressing "Upland Stormwater Runoff" and it has led to the failure of many projects.

Here are just a few examples.....

- 1. Red Hill stream restoration, washed out, no biological uplift according to recent survey.
- 2. Longfellow stream, acres of trees removed, hundreds of newly planted trees left to die.
- 3. Great Oaks Way, step pool washed out at the first storm half acre of trees removed, most of the replacements are dead. I was was told by the county there wouldn't any follow up!
- 4. New Country Lane, project accelerated channel erosion and 1 acre of trees removed.
- 5. Mellen Court Capital Project D-1158, destruction of trees and scrubs
- 6. Gerwig Lane Dam project, destruction of wild life habitat turned an area that was soaking up rain into four lakes.
- 7. Lighting View Road to Rt 29 stream, 4 acres of trees removed no biological uplift.
- 8. Bright Passage, bridge repair that has turned into a \$200k project with with many trees being removed with no improvements to the quality of the water entering the Middle Patuxent River.

The list goes on and on...

Also many BMP's are not functioning and not even monitored by Howard County. But at the same time my business property gets inspected every 2 years and they always find some maintenance items. An expert I hired to address this discrepancy found that the county didn't have enough staff inspect and enforce BMP maintenance!

The EPA says when developing stormwater management plans that ALL stakeholders should be included. This has not happened in our county.

In Howard County many entities are not included in the evaluation of stormwater projects, even the county's own agencies don't work together!

Stormwater is covered by several agencies.

Stormwater management division
DPZ development engineering division
Transportation and special projects division
Bureau of highways

To summarize, the permitting process should include a greater emphasis on the upland watershed. See proposed Columbia Stormwater Mitigation Plan.

Growing up in Columbia we learn many quote from James Rouse our founder. But it was his wife who said something directly related to today's hearing that I hope you keep in mind as you draft new regulations.

"WHAT'S THE SENSE OF MOPPING UP THE FLOOR IF WE DON'T TURN OFF THE FAUCET? quoted by Libby Rouse

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Below is a copy of a stormwater mitigation plan for Columbia that was presented to the Columbia Association Board of directors last year. You will notice that stream restoration is missing, the reason is because they don't work!

Please remove from the permitting process.

## Columbia stormwater mitigation plan.

Background: CA open space is the receiver of unmitigated stormwater that flows from mainly Howard County streets, Private property (homeowners and businesses)

At this time we don't know just how much stormwater can be mitigated from these 3 sources.

We have heard from scientists that the most ideal way to mitigate stormwater is to emulate the native forest in the watersheds that feed into our streams. Forests slow and retain the rain so it seeps into the ground water.

We have also heard that having the BMP's perform as originally designed will help our streams and open space.

Howard County (all of departments, roads, environmental, stormwater etc), CA, CA WAC and LR WAC, Homeowners and businesses responsibilities....

Howard County, Perform "rapid neighborhood assessments" to identify all opportunities to install Bay Wise Landscaping, stormwater planters, rain gardens, redirecting stormwater etc. Have community educational events to demonstrate the importance of stormwater management.

Homeowners, adoption of methods (see above) to mitigate rain where it falls, "soak it up" "retain the rain" "slow the flow". Funded by the HC stormwater fee.

Howard County opportunities, evaluate streets and implement projects that address stormwater before it flows into the drains.

Direct and retain stormwater into green areas between street and sidewalks, replace street surfaces with pervious pavement, install storm drain filters at stormwater drains to filter and slow the flow.

Fully fund the Best Management Practices (BMP) inspection program so that all BMP's function as designed.

Howard County and CA, Evaluate stormwater outfalls

Update and restore outfalls

CA, lobby county to completely fund the BMP inspection program, street upgrades, resident projects to reduce stormwater flowing into CA Open Space.

Contact homeowners in upland watershed to promote the installation of rain gardens when grants are available.

First draft March 2023 by Brian England