

(no subject)

1 message

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Thu, Jul 18, 2024 at 2:39 PM

To: "Stewart.Comstock@Maryland.gov" <Stewart.Comstock@maryland.gov>

Stewart Comstock

Maryland Department of the Environment

Water and Science Administration

1800 Washington Blvd.

Baltimore, MD 21230

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

Dear Mr. Comstock:

My name is Roger Davis and I live in Ellicott City, Maryland. I am writing to request that you deny the MS4 permit to the MD State Highway Administration until they remove the use of stream restorations from their permit. On your website you state that jurisdictions should stop upstream or upland sources of stormwater before stream restorations are implemented. One project I am familiar with is the Longfellow stream restoration in Columbia. In addition to the many problems caused by that project the origin of that stream in Cedar Lane Park has several areas where stormwater management ponds could have easily been constructed yet to this day excess runoff from the sports fields is actively eroding stream banks in the woods upstream from the Longfellow Project. I have not heard of any plans to build ponds but there are colored tapes on trees in the woods outlining the wetlands. So it looks like there are plans to destroy more native habitat rather than stopping the water at its source. The lack of any true cost benefit analysis in stream restoration site selection is reprehensible.

Another project I am familiar with is the Plumtree Branch Stream Restoration in Ellicott City. This project has been cancelled because of neighborhood opposition. The State Highway Administration is responsible for much of the erosion in the Plumtree Branch. Interstate 70, US 40 and US 29 all contribute significant water to the Plumtree Branch. There is still significant undeveloped land on the southern side of I 70 some of which is owned by SHA which could be used to mitigate the runoff from I 70. There are eroded stream banks 10 ft. high just downstream from the highway. Rt 40 has a grassy median which could be converted to some sort of stormwater retention pond, or at least planted with trees which would also improve its looks. Rt 29 supplies the stormwater that feeds an unnamed tributary that joins the Plumtree Branch on the southern edge of the Northfield Elementary/ Dunloggin Middle Schools property. MDE granted a Stream Restoration Permit in 2017 even though nothing was done to stop the water coming from Rt 29. The beginning of this tributary at Rt 29 is another opportunity for SHA to mitigate damage being done to the Plumtree Branch. The outfall pipe from Rt 29 is either on public property or property owned by the adjacent church. This wooded area is already shaped like a pond and would require minimal excavation to make it a stormwater management pond. I took the President and Vice President of the Howard County Sierra Club to the point where the "restored" tributary met the main Plumtree Branch that supposedly needed restoration. I had taken them through the woods to this point so they were disoriented and could not tell which stream had been restored and which stream needed a 1.8 million dollar stream restoration!

I have read the Margaret Palmer study from 2014 which she still stands by. I spoke with an eminent hydrologist from the University of Maryland who told me the nutrient and sediment removal numbers on which stream restorations are based are "all made up". I have read that the Inspector General for the EPA criticized them for claiming improvements to the bay based on models rather than actual evidence. I have read the CESR study which is 130 pages long and only mentions stream restorations twice. I have shown videos of a stream restoration contractor dumping mud into the Little Patuxent River to Secretary McIlwain in person and emailed them to Jeremy Baker and nothing was done. It is time for you to do the right thing and stop allowing stream restorations.

Thank You,

Roger S. Davis