



THE MARYLAND GENERAL ASSEMBLY
ANNAPOLIS, MARYLAND 21401

July 26, 2024

Mr. Stewart Comstock
Maryland Department of the Environment
Water and Science Administration
Stormwater, Dam Safety, and Flood Management Program
1800 Washington Blvd., Suite 440
Baltimore, Maryland 21230-1708

RE: Draft NPDES Permit No. 24-DP-3313, NPDES No. MD0068276 for MDOT SHA

Dear Mr. Comstock:

Thank you for the opportunity to offer comment on the draft National Pollution Discharge Elimination System (NPDES) Permit for the Maryland State Highway Administration (SHA). Attached is a copy of a letter submitted to the Maryland Department of the Environment (MDE) last week by the Chesapeake Bay Foundation. We wholeheartedly agree with their comments, support their recommendations, and hope MDE will give them serious consideration as the Department evaluates SHA's draft permit.

As you may know, we have sponsored legislation in the General Assembly regarding stream restoration projects and have raised concerns about the unintended consequences these projects have on the environment - especially when it comes to the removal of mature trees. We want to emphasize the vital role that trees play in our state by sequestering carbon and reducing the temperature of air, land, and water, which are critical in managing the impact of our changing climate. In addition, trees play a direct role in reducing and filtering stormwater runoff. Stream restoration projects which include significant tree removal should be limited when used to satisfy requirements to treat/mitigate stormwater runoff of impervious surfaces.

Again, thank you for the opportunity to comment.

Sincerely,

Delegate Jen Terrasa, District 13
Delegate Sheila Ruth, District 44B
Delegate Mary Lehman, District 21