

NPDES MS4 permit for MDOT SHA, NPDES Permit Number: MD0068276, MDE Permit Number: 24-DP-3313

1 message

Sarah Kellett <sarah@omgym.com>

Wed, Jul 17, 2024 at 2:19 PM

To: Stewart.Comstock@maryland.gov

To: Maryland Department of the Environment,
Water and Science Administration,
[1800 Washington Boulevard](#),
[Baltimore, Maryland, 21230](#), or
Stewart Comstock
Stewart.Comstock@Maryland.gov

Subject: NPDES MS4 permit for MDOT SHA, NPDES Permit Number: MD0068276, MDE Permit Number: 24-DP-3313

Greetings Mr. Comstock,

I strongly urge Maryland Department of the Environment to remove all proposed stream restoration projects from the MDOT SHA MS4 permit because it is now evident that stream restorations are not benefiting the stream or watershed as a whole. It is also evident that projects are being executed mainly with the goal of profit for a few individuals, and that companies performing the restorations are using a variety of tactics to take advantage of loopholes within the system. These tactics appear to be overlooked time and time again, despite a repeated failure to demonstrate biological uplift or hydrological improvement by the offending companies.

Aside from offering minimal (if any) benefit, streams that are “restored” incur great damages in the form of extensive tree removal, and total destruction of the surrounding ecosystem. The microclimate and hydrology is then ultimately changed in a way that challenges the success of any new ecosystem, as we can see in existing stream restoration sites.

I have personally visited Longfellow in Columbia, along with some other stream restoration sites to assess the matter for myself, and the results appear to be an environmental disaster. I am not a scientist, but I am a concerned member of the public and I certainly know a dead tree immersed in pools of stagnant water when I see one. That is what I personally found at the stream restoration sites, along with invasive plant species everywhere I looked, presumably because the hydrology and ecology was changed by a group who didn't truly understand the impacts of what they were doing. No company on this earth can duplicate in months or even a few years what mother nature has done over the course of millions of years. Projects such as these being done without clear benefit, show a gross disrespect for nature, and for any community depending on this nature in any way. They benefit the few (in the form of cash), and hurt the many, especially as it pertains to wildlife.

Please put an end to this extremely destructive and horrifying practice and encourage stormwater management at its source. This would ironically include planting as many trees as possible (as opposed to cutting them down in a stream restoration), among other practices that actually do help the watershed. It would be lovely to see any such practice be performed with a preliminary requirement of being clearly documented as biologically beneficial by modern science, unlike stream restoration.

Aside from damaging communities and the environment, the continued implementation of stream restoration projects will call into question MDE's overall effectiveness as a regulatory agency, and will shed light on a broken system in dire need of repair. I personally believe that the level of environmental destruction that this issue is causing is newsworthy, even though not currently well-known, and could cause MDE to have a very uncomfortable day in the spotlight. As a member of the public, I would like to point out that we have entrusted MDE to make regulatory decisions that protect and serve the environment. I believe that for most of the public, it is therefore expected that any regulations on waterway management follow the suggested guidelines of leading scientists such as Margaret Palmer on the matter. Because stream restorations are generally not supported by the published scientific literature (which is evident to me from reading the published work that is publicly available), continuing to allow stream restoration projects to be a part of the MDOT SHA MS4 permit would be a very concerning abuse of public trust.

Please help me and others to restore trust and good faith in MDE, and again, please stop enabling the destruction of our waterways via stream restoration.

Thank You,

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