

Regarding MDE Tentative Permit Number 24-DP-3313

1 message

Michael Wiercinski <Michael.Wiercinski.716899992@grassrootsmessage.com>

Fri, Jul 12, 2024 at 5:47 PM

Reply-To: Michael Wiercinski <michael.j.wiercinski@gmail.com>

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

Dear Mr. Stewart Comstock,

I am writing to comment on the proposed reissue of the NPDES MS4 permit for the Maryland Department of Transportation State Highway Administration (permit number MD0068276, 24-DP3313). This MS4 permit is significant, covering the third largest impervious surface area in the state.

If not included, the application of salt on impervious areas should be addressed. The application seems to be very excessive in our area. The salt remains after the winter storm and is eventually washed into waterways.

Erosion and sediment controls are also critical for construction areas-monitoring the controls before and after a rain event is needed to insure effectiveness.

I urge MDE to update the proposed permit to:

- Reflect increased storm intensity and other impacts of climate change. The existing stormwater management guidance does not adequately account for higher volumes of runoff generated by more frequent and intense rainfall events now seen in Maryland;
- Require a range of effective Best Management Practices (BMPs) to mitigate stormwater pollution;
- Expand monitoring to include water temperature and biological impacts from polluted runoff; and
- Develop plans to monitor and address pollutants like polychlorinated biphenyls (PCBs) and per- and polyfluoroalkyl substances (PFAS). These and other emerging pollutants pose a threat to living resources and the drinking supply of many Marylanders.

Stormwater runoff is the fastest growing source of water pollution in Maryland, leading to numerous threats like erosion, habitat destruction, and increased pollution from nutrients, sediment, and chemical contamination. Maryland's stormwater permits must fully account for the impacts caused by our changing climate and ensure that ecosystems, wildlife, and public health are protected.

Thank you for considering these comments.

Regards,

Michael Wiercinski