



Maryland

Department of the Environment

Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Grumbles
Secretary

August 30, 2017

Ms. Sonal Ram, Director
Office of Environmental Design
Maryland State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Dear Ms. Ram:

The Maryland Department of the Environment (MDE) acknowledges the receipt of revisions to Maryland Department of Transportation State Highway Administration's (MDOT SHA) Alternative Headwater Channel and Outfall Crediting Protocol, received on May 18, 2017. MDE would like to acknowledge MDOT SHA for their good-faith effort in working with MDE during the review process.

MDE tentatively approves of this Protocol for quantifying the amount of prevented sediment loss in order to determine load reductions and an equivalent amount of impervious area treatment. However, MDE's interim approval is subject to the following qualifications:

- Inclusion of an inspection and maintenance checklist.
- The Protocol shall make it explicitly clear that it will be limited to zero or first order streams.
- The interim credit will remain capped at the amount of impervious acres in the contributing watershed.
- To confirm performance and credit amounts, MDE requests that MDOT SHA perform physical bank and thalweg assessment monitoring on a subset of study sites based on the predominant geological conditions where this practice will be implemented. The physical monitoring plan should be used to support the equilibrium analysis provided in the Protocol.

MDE requests that MDOT SHA submit a revised Protocol that incorporates the above interim understandings and proposed study design at your earliest convenience. MDE commends MDOT SHA for its commitment to improving this assessment program that will aid in restoring the State's water resources. MDE also supports the submittal of the Protocol to the Chesapeake Bay Program Urban Stormwater Workgroup for consideration as a stream restoration derivative. If you have any questions regarding this review, please contact me at 410-537-3545 or Mr. Brian Cooper at 410-537-3583 or brian.cooper@maryland.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Raymond P. Bahr".

Raymond P. Bahr
Program Review Division Chief
Sediment, Stormwater, and Dam Safety Program

cc: Karen Coffman, MDOT SHA