

Comments on Montgomery County's FY25 Capital Budget, Conservation of Natural Resources Section

1. So called "stream restorations" really are not restorations at all. These large-scale engineering projects denude and destroy our increasingly scarce natural areas. Just a few years after a project is completed, it is often "blow-out" (washed-out) in a large rain event. The projects frequently do not work to stabilize streams. They certainly do not improve the ecology of a stream or a stream valley. They often allow the introduction of unwanted invasive plant species that completely take over a once beautiful natural area.
2. The urban stormwater problem is best addressed by installing stormwater Best Management Practices (BMPs) that slow, filter and sequester stormwater *before* the water reaches a stream. Upstream BMPs, unlike stream "restorations," address a whole list of residents' concerns. These practices reduce urban flooding, reduce the heat island effect, increase property values, provide green spaces in urban areas, and protect and nurture natural areas.
3. There are about 20 stormwater Best Management Practices that are less expensive than stream "restorations" according to Maryland Department of the Environment.
4. The way to stop stream erosion is to address the problem at its source. Stormwater Best Management Practices (BMPs) slow, filter and sequester stormwater before the water reaches a stream. Wide-scale adoption of BMP greatly reduces the amount of water reaching a stream in a large rain event, reducing erosion. Non-destructive BMPs, such as rain gardens, bioswales, tree plantings, permeable pavers, etc. do not destroy natural areas. They are put in place in already disturbed areas.
5. Stream "restoration" projects are frequently done to obtain Chesapeake Bay pollution reduction credits. The nutrient credits from these projects are based on engineering estimates. These credit estimates have been shown to be badly inflated. Credits for the reduction of Total Nitrogen, Total Phosphorous and Total Suspended Sediment, the principal Bay pollutants, should be based on water quality monitoring studies, not engineering estimates. Nutrient reductions for stream "restorations" very likely overstate nutrient reductions. Base any in-stream work on robust water quality monitoring, good measurements, and sound science.

We can protect our streams and save taxpayer dollars by meeting stormwater control regulations with upland, out-of-stream practices. Tell the County Council to remove funding for unnecessary and destructive stream "restoration" projects!

Sincerely,

Bill Gillespie