Public Hearing: SHA MS4 Permit - #11-DP-3313 (MD0068276)

022615

5pm MDE's Terra Conference Room 1800 Washington Blvd Baltimore, MD

<u>Testimony delivered is revised here to include additional comments:</u>

031315

Marian Dombroski, RA, LEED AP 6205 Lombard Street Cheverly, MD 20785

- AWCAC - Vice Chair for Prince George's County representing Friends If Quincy Run Watershed 30 year resident of Prince George's County, Maryland Council District 5, SHA District 3



I am a founding member of Friends of Lower
Beaverdam Creek, Friends of Quincy Run and
AWCAC Vice Chair for Prince George's County and
an active member of my community. I am one of many
citizens taking part in efforts to restore the health of our
local streams, the Anacostia River, and the Chesapeake
Bay. We value our natural areas, and support
sustainable development practices for health, recreational,
scenic, and economic benefits to the community. Clean
water is one of the greatest challenges of this century.
We believe it is our responsibility to do all that we can to
achieve it. The Clean Water Act was passed over 40
years ago. Many communities across our country have

made great strides towards achieving clean water. Boston and Denver, to name just two, have made their rivers swimmable. I hope we will soon do the same for ours.

Thank you for the opportunity to speak at this hearing and provide input into this MS4 Permit which has the potential of having a very positive impact on the health of my community and of our state. Living in an urban area, as I do, I see every day the impacts of our roadways and supporting infrastructure. My neighborhood is bound by the Baltimore-Washington Parkway (built the year I was born), Route 50, and Route 202. The construction of these roadways drastically altered the hydrology of this part of the Anacostia Watershed, just 1 mile from the River, itself. This permit is important to me on a very personal level. The condition of the 2 streams closest to me is tragic. In fact, Lower Beaverdam Creek has been identified as the most degraded in the Anacostia Watershed. Water problems damage public land, degrade our neighborhoods, create hazardous conditions, and destroy our property.

I am happy to see many improvements in this permit over the last, and look forward to changes to our waterways and other public property that, I hope, will be for the better. While preparing these comments, I tried to follow the organization of the permit, but am not making any promises.

Probably the most physically evident challenges to clean water in my area is the lack of coordination of efforts. This issue was recognized in the new permit. I hope more consideration will be given to this critical issue. Several agencies in my county issued an MOU this summer aimed at facilitating permitting, declaring Prince George's County as Open for Business. Sadly excluded from this group was our Department of the environment. I hope interagency and inter, jurisdictional coordination will be undertaken for our clean water programs. We need to move forward for the Bay - together. We hope you and other state agencies will declare our natural areas open for habitation.

Now Quickly, here are some of my concerns:

- please ID all SHA infrastructure like the storm drain stenciling program
- Post signage (similar to Planning Board notification) in areas "in-design" and allow for community input
- Direct all agencies working on public property to post signage identifying their agency and project

 AATERCHED RESTORATION AREA

WATERSHED RESTORATION AREA

Add "revisit SHA standard details to include the most effective green SWM techniques"



STORM WATER SYSTEM

- Include all SHA property do not exclude districts 1, 2, and 6. All infrastructure must be designed and improved to protect our waterways.
- Include maps in the permit indicating the SHA Districts
- Revisit major projects in the pipeline to find opportunities for improvement/incorporation of ESD features

PERMIT REQUIREMENTS

"Show a reduction of pollutants" More waterways, at least one per major watershed, must be monitored to make this determination. We

challenge you to start with Lower Beaverdam Creek - the most degraded in the Anacostia.

So glad to hear that you plan to manage events to 2.7", and plan to use woods in good condition as the standard.

LITTER AND FLOATABLES

- "Evaluate current problems and develop public out reach and education" many people are working on this. Please support, financially and otherwise, groups already doing this work. Prince George's County includes volunteer efforts to fulfill their trash TMDLs. Taking credits for these efforts warrants consideration.
- Support volunteer efforts by supervising work in dangerous areas, helping to remove bulk items at community clean-ups. Support work on development of trash traps. Employ water friendly maintenance practices.





dangerous conditions and

damages due to run-off

WATERSHED ASSESSMENTS

- The permit needs more detail and provision for public participation. Every waterbody that does not meet the criterion for its use needs a watershed assessment. SHA needs to participate in this effort.
- Review the ARP for candidate projects identified by the Corps of Engineers to aid
- in project selection. Incorporate these where possible. Look for opportunities to collaborate with other agencies.
- Distribute protocol for assessment and monitoring. Coordinate efforts with Md's Water Monitoring Council to conserve resources - avoid duplication
- Make SHA activities open to the public. Include municipalities, public works, contractors, citizen and volunteer groups, and businesses in project identification, selection, planning, implementation, and evaluation. **ENFORCEMENT**

"successive iterations will be driven by assuring maintenance of water quality standard"



Goal must always be improvement until all waterways are safe, swimmable and fishable



TRANSPARENCY must be made a priority: Please include the following:

Criterion for project prioritization and selection

- Define a clear path for public participation
- Too many times projects are developed without any notification of or input from the community. We pay for these projects. We live with the results. We

are working toward the same goals. Please make us partners.

Widely publish activities and plans. Baltimore papers and SHA websites are not adequate for public outreach. Like Planning Commissions, post signs where projects are being considered, and for each phase along the way. This process could also facilitate coordination with other agencies.

Thank you for the opportunity tp provide comments. I look forward to your response, and to seeing real progress toward achieving the promise of the Clean Water Act.



property - missed opportunity