

# Montgomery Coalition to Prevent Stream Destruction

February 28, 2021

Ms. Adriana Hochberg  
Assistant Chief Administrative Officer and Climate Change Coordinator  
Executive Office Building  
Rockville, MD 20850  
(Adriana.Hochberg@montgomerycountymd.gov)

**SUBJECT: Comments on the Montgomery County [draft Climate Action Plan \(CAP\)](#)**

Dear Ms. Hochberg:

The Montgomery Coalition to Prevent Stream Destruction provides the following comments (attached below) on specific sections of the Climate Action Plan (CAP) primarily relating to “stream restorations”. There are admirable aspects of the CAP as noted below. Overall, however, we feel that the CAP does not provide enough explicit protection for stream valleys from 1) the ravages of more intense rain events driven by climate change and 2) the destructive practice of “stream restorations”.

In addition, the CAP directly contradicts the current direction of the new MS4 Permit and the County’s design/build “Clean Water Montgomery Program” RFP. While the CAP purports to having a goal of protecting existing forests, the MS4 Permit RFP would allow up to 50% of its credit to come from “stream restorations”. The Department of Environmental Protection states, “To date, the County has completed stream restoration projects, restoring almost 30,000 linear feet of stream...” per the latest [report](#) on meeting the MS4 Permit. It is estimated that this has resulted in the destruction of almost 30 acres of forest, not including the loss due to access road construction (30,000 ft x average 40 ft width cleared along streams). The CAP should strictly prohibit the practice of “stream restorations” until the re-examination of this issue has taken place via a dialog among all stakeholders.

Thank you for consideration of our comments.

Sincerely,

**Organizations:**

West Montgomery County Citizens Association (WMCCA): Ken Bawer, President  
Cloverly Civic Association: Quentin Remein, President, Spencerville  
EcoPlant Consulting: Judy Fulton  
Friends of Ten Mile Creek and Little Seneca Reservoir: Anne James, President  
Glen Echo Heights Citizens’ Association: Lisa Esquivel-Griffin, President  
Greater Shady Grove Civic Alliance: Carol Kosary, President  
Montgomery Countryside Alliance (MCA): Caroline Taylor, Executive Director  
West Laurel Civic Association: Barbara Sollner-Webb, President

**Individuals<sup>1</sup>:**

Edd Barrows, Bethesda

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<sup>1</sup> The views of individuals may not necessarily reflect those of their listed affiliations.

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Nina Bartholme, Rock Creek Woods, Silver Spring  
Ed Bartholme, Rock Creek Woods, Silver Spring  
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Ceric Beachem, Rock Creek Woods, Silver Spring  
John Beaudet, Rock Creek Woods, Silver Spring  
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Cindy Camp, Rock Creek Woods, Silver Spring  
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Edna Miller, Montgomery Village  
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Jennifer Nathanson, member of MNPS, volunteer with the Alice Ferguson Foundation; Silver Spring  
Bruce Nichols, Rock Creek Woods, Silver Spring  
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Maryann Wilmot, Rock Creek Woods, Silver Spring  
Peter Wood, Montgomery Village Green Coalition  
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Cc:

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Councilmember Will Jawando  
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Ken Silverman, Chief of Staff, Councilmember Hans Riemer

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## ATTACHMENT: Comments by section

**Note:** It would be helpful to have a section that specifically addressed “Protecting our Natural Resources from Effects of Climate Change.”

- Carbon Sequestration Actions
  - S-1: Retain Forests (p. 140):
    - COMMENT: The county’s current policy of allowing the destructive practice of “stream restoration”, often to meet MS4 Permits, is diametrically opposed to the goal of protecting existing forests. “Stream restorations” reverse carbon sequestration by destroying thousands of trees.
    - COMMENT: The Department of Environmental Protection states, “To date, the County has completed stream restoration projects, restoring almost 30,000 linear feet of stream...” per the latest [report](#) on meeting the MS4 Permit. It is estimated that this has resulted in the destruction of almost 30 acres of forest, not including the loss due to access road construction (30,000 ft x 40 ft width cleared along streams).
  - S-3: Restore Forests, Meadows, and Wetlands Tree Canopy (p. 144)
    - COMMENT: Creating wetlands where none existed before would be a waste of taxpayer revenue. It is the height of human hubris to think that a new ecosystem should (and could) be created where none existed before.
  - S-5: Restore Soil Fertility, Microbial Activity, and Moisture-Holding Capacity (p. 147)
    - COMMENT: “Stream restorations” defeat the stated goal since they may involve removing tons of stream bank soil along with all the microbes, plants, and animals residing on and in it.
- Climate Adaptation Actions
  - A-1: Water Infrastructure Resilience (p. 153)
    - COMMENT: WSSC sewer lines in stream valleys are under constant attack by upland (out of stream valley) stormwater runoff. Stormwater must be controlled at its source, upland in previously disturbed areas, to prevent in-stream infrastructure protection projects from being periodically blown out.
  - A-2: Culvert Repairs (p. 154)
    - COMMENT: This section should include controlling stormwater at its source (out of stream valleys).
  - A-3: Temperature Monitoring and Alerts (p. 155)
    - COMMENT: Since temperature is closely tied to air quality, this action should include air quality alerts.
  - A-7: Green Streetscape
    - COMMENT: The current Green Streets program is critical for controlling stormwater before it enters streams. This program needs to be expanded as a way of eliminating “stream restoration” projects.
  - A-10: Green Infrastructure
    - COMMENT: The existing RainScapes program should receive increased funding – it ran out of funds in 2020. However, this is a voluntary program. The County code should be changed to require mandatory stormwater control on existing properties

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- to new-build standards at the time of property transfer. This mechanism would eliminate any financial burden to existing owners (e.g., for fixed income retirees).
- COMMENT: Re. MS4 Permit, improved water quality (TN, TP, SS) must not come at the expense of total ecosystem health. Currently the new design/build “Clean Water Montgomery Program” RFP will allow up to 50% of MS4 credits to come from “stream restorations”. This is an environmentally destructive proposal as stated throughout our comments.
  - COMMENT: This section talks about “preserving the quality of stream and river habitats.” One good way to start would be to eliminate the use of “stream restorations” which do the exact opposite.
  - A-13: Ban Stormwater Management Requirements Waivers
    - COMMENT: Totally support!
  - A-15: Water Supply Protection
    - COMMENT: Totally support as long as protection measures do not include “stream restorations”.
  - A-17: On-Site Water Reuse
    - COMMENT: Totally support a code change to allow grey water use. This is especially important for septic system owners to help avoid hydraulic overloading of septic systems.
    - COMMENT: This action needs to include well-water users, not just WSSC water users.
  - A-19: Advocacy for Off-River Water Storage
    - COMMENT: The County should also increase protection for the watersheds of the Little Seneca Lake which is one of our current emergency water sources.