

## **Comments on Proposed Howard County Forest Conservation Act Amendment CB-40**

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I'm Bob Dover. I'm speaking tonight in favor of CB-40.

I live adjacent to Elkhorn Branch, but I also offer my comments as a surface water hydrologist with more than 30 years of environmental planning experience. I've served as the surface water expert on dozens of environmental projects, and I author and perform technical reviews on environmental permit applications.

When I learned about the Elkhorn project, I began a six month-long analysis of stream restoration projects in Howard County. Three minutes is too short to present all of my findings. A few weeks ago, I submitted comments to DPW on the Plumtree Branch project. Those comments applied broadly to the stream restoration programs of both DPW and CA. I've provided those comments to you in both hard-copy and electronic format. I've also made lengthier presentations to anyone who would listen, and would be happy to meet with Council members or Staff to go through the details.

Stream restoration projects are enormously destructive. They require the removal of acres of trees, destruction of mature habitat, and elimination of the views of trees for which we residents paid premium home prices. Removal of trees also increases flooding, threatening adjacent properties.

This all might be fine, if the projects actually stabilized streams, improved water quality, and uplifted ecological function. They don't. The consensus of the peer-reviewed, scientific literature for the past 15 years is these projects don't result in any water quality or ecological improvement. DPW's own MS4 annual reports to MDE document this. Removal of trees actually increases runoff, which is what caused the problem in the first place.

Why are these uncomfortable facts about stream restoration not more widely known? It's because there's no mention of them in the contractor's permit applications and design documents. Both the Elkhorn and Plumtree documents made claims of water quality and ecological benefits by misrepresenting 20-year old articles. Neither of them acknowledges the large amount of scientific literature developed since 2005, and neither of them mentions the negative results from DPW's own past projects.

Howard County must stop this unnecessary destruction of trees, and removal of the exemption for stream restoration projects would be an important first step. At a minimum, this would actually make DPW and CA think about the adverse impacts of their projects, and disclose those impacts to the public. Once the actual impacts and benefits are disclosed, public support for these projects will evaporate, because the public will see that these projects were never about stream restoration – they were about generating profits for stream restoration companies.