Coalition to Stop Stream Destruction

Kenneth Bawer

February 10, 2026

Montgomery County Council
Council Office Building
100 Maryland Avenue, 6th Floor
Rockville, MD 20850

Subject: Written testimony on FY27 Capital Budget and FY27-32 Capital Improvements Program (CIP)

Position: Against - Move funding for stream "restorations" in DEP and Parks budget to upland stormwater control projects

References: Montgomery County FY27 Capital Budget

Dear Council President Fani-González, Vice President Balcombe, and Councilmembers:

The Coalition to Stop Stream Destruction (CSSD) urges you to transfer funding for destructive engineered stream "restorations" in the DEP and Parks budget to out-of-stream stormwater control projects in the Montgomery County FY27 Capital Budget given the non-destructive alternatives. This is a common-sense, fiscally sound approach to meeting our regulatory obligations and erosion problems.

This would not prevent MS4 permit regulatory requirements from being met using alternative non-destructive practices (see below). It would also not prevent other infrastructure and property protection projects, such as for exposed sewer lines and backyard erosion, which can be done via spot repairs independent of engineered stream "restorations."

WHAT ARE THEY? Engineered stream "restorations" are civil engineering projects that destroy natural areas, converting streams into man-made stormwater conveyances using heavy equipment to clearcut steam-side forests, dig artificial channel shapes, and dump fill material into streams. They lead to a decreased ability of floodplains to absorb flood water due to more frequent soil saturation, death of existing trees not adapted to water-logged soil, and deposition of stormwater toxins.

For a **presentation**, go to https://drive.google.com/file/d/1GDN1FAzim8Bx6K5s5y8VD0xjtp0ok5vA/view. See **a one page fact sheet** with references at https://drive.google.com/file/d/1_xTGc8n9RcmVysFBqqj7TDVnaRo48lCw/view?usp=sharing.

WHAT DAMAGE IS DONE? If you have not seen an engineered stream "restoration," watch a few short videos at https://www.youtube.com/@EngineeredStreamRestoration.

WHY ARE THEY DONE? These projects try, but fail, to stop stream erosion, improve water quality, and uplift stream ecology.

WHAT CAUSES STREAM EROSION? The major cause of excessive stream erosion is uncontrolled stormwater runoff from impervious surfaces like roads, roofs, parking lots, etc. that firehoses into steams.

WHAT DOES THE SCIENCE SAY? The purported benefits of engineered stream "restorations" are not supported by the published science and observations on the ground. The Chesapeake Bay Program Expert Panel Report (https://chesapeakestormwater.net/wp-content/uploads/2022/07/9928-1.pdf) acknowledges that engineered stream "restorations" do not stop erosion. Published papers analyzed over 700 engineered stream "restorations" to show that water quality and ecological function are not improved and are sometimes worse. A few claims of "successful" projects do not disprove the preponderance of evidence. See the scientific references in **a one page fact sheet** at https://drive.google.com/file/d/1_xTGc8n9RcmVysFBqqj7TDVnaRo48lCw/view?usp=sharing. Even DEP admits that none of their projects improved stream ecology as measured by standard Benthic Macro-Invertebrate analyses.

WHAT ARE THE ALTERNATIVES? Instead of destructive engineered stream "restorations" that need expensive repairs after storms (see photos of storm-damaged projects in a presentation at https://drive.google.com/file/d/1GDN1FAzim8Bx6K5s5y8VD0xjtp0ok5vA/view?usp=sharing), regulatory requirements can be met by dozens of non-destructive, upland (out-of-stream) stormwater control practices such as bioretentions, permeable pavement and roadside bioswales (see photos on DEP's Green Streets web site at https://www.montgomerycountymd.gov/DEP/water/clean-water-montgomery/watershed/green-streets.html).

DEP has claimed that there are not enough upland areas for stormwater control, even when that option has not been analyzed (e.g., for the Grosvenor Luxmanor and Falls Reach projects). DEP has also claimed that upland stormwater control cannot stop stream erosion by drawing unsupported conclusions from papers by Williams et al. (2022), https://www.sciencedirect.com/science/article/pii/S0169555X22002926?via%3Dihub, and Thompson, et al. (2023), https://drive.google.com/file/d/1isYAs58zVsLJ9H1VOiu4PvzMuYvSplf3/view. The proper conclusion from those papers is that too few properly sized upland projects were done to control the stormwater. Once upland stormwater runoff is controlled, evidence suggests that streambanks will self-stabilize.

WHAT ABOUT COST? Many of these alternatives are less expensive than engineered stream "restorations" per Maryland Department of the Environment (MDE) (at https://mde.maryland.gov/programs/water/StormwaterManagementProgram/Documents/FAP-WPRP/2022%20Stormwater%20Financial%20Assurance%20Plan%20Annual%20Report%20to

%20Governor_%20MSAR%20%23%2010954%2010.18.2022.pdf) and help prevent stream erosion in the first place.

WHAT ARE THE CO-BENEFITS? In contrast to engineered stream "restorations, since the alternatives can be built in already disturbed developed areas, they provide co-benefits" such as reducing urban flooding and heat islands, providing green spaces, increasing property values, and protecting streams and floodplains from toxins in stormwater. Our natural areas must be protected given global warming and the County's Climate Action Plan's goal to "Retain, increase, and restore terrestrial ecosystems including forests…."

OUR ASK: For these reasons, we ask you to transfer funding from destructive engineered stream "restorations" in the DEP and Parks budget to out-of-stream stormwater control projects in the MoCo FY27 Capital Budget given the non-destructive alternatives. This is a common-sense, fiscally sound approach to meeting our regulatory obligations and erosion problems.

Sincerely,

Kenneth Bawer
Coalition to Stop Stream Destruction