



February 7, 2025

The Honorable Brian J. Feldman  
Chair, Education, Energy, and the Environment Committee  
2 West, Miller Senate Office Building  
Annapolis, MD 21401

**Re: SUPPORT WITH AMENDMENTS--SB 250 (Department of the Environment-Fees, Penalties, Funding, and Regulation)**

Dear Chairman Feldman:

On behalf of the Maryland Municipal Stormwater Association (MAMSA), I am writing to **request amendments to** SB 250, which would, among other things, create a new fee for dam safety permits to construct, reconstruct, repair, remove, or modify a dam (p. 18, l. 32-33) and a new annual fee for registering a dam with the Maryland Department of the Environment (MDE) (p. 24, l. 16).

MAMSA is an association of the State's local governments and leading stormwater consultant firms who work for clean water and safe infrastructure based on sound science and good public policy. Many of MAMSA's members own dams on the State's Dam Inventory that would be subject to these new fees.

MAMSA supports MDE having adequate funding to do the important work it needs to do to ensure dam safety and understands the need to fund needed dam improvements. In fact, MAMSA members undertake these types of projects on a regular basis using local dollars. However, MAMSA is concerned that SB 250 does not identify any specific fees that our members would be asked to pay for permits or registration. MAMSA **requests amendments** that would establish explicit fees in the Environment Article, with an allowance for future reasonable increases tied to inflation. Specifically, for permits to construct, reconstruct, repair, remove, or modify a dam, we request that the bill be amended to state that the fee will be the lesser of 1% of the total project cost or a maximum of \$10,000. For registering a dam, we request that the bill be amended to state that the annual fee will be \$200 for low hazard dams, \$500 for significant hazard dams, and \$1,500 for a high hazard dam, with fees capped at a maximum of \$400, \$750, and \$2,000, respectively. In addition, we would ask for clarification that the requirements to register a dam and pay permit and registration fees only apply to dams that are currently listed on the State's Dam Inventory.

From a larger picture perspective, we are also aware that the need for funding to repair private dams is high; the total cost for bringing all private dams up to current standards is likely in the hundreds of millions of dollars. Long term, we request that the General Assembly consider options for funding dam repairs so that the cost of these projects is not solely borne by existing dam owners.

MAMSA Letter – SB 250  
February 7, 2025  
Page 2

Please feel free to contact me with any questions at [Lisa@AquaLaw.com](mailto:Lisa@AquaLaw.com) or 804-716-9021.

Sincerely,



Lisa M. Ochsenhirt, MAMSA Deputy General Counsel  
cc: Committee Members, SB 250 Sponsor