



February 27, 2026

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

**Re: OPPOSE -- SB 688 (Environment – Stream and Floodplain Restoration Projects – Requirements and Limitations)**

Dear Chair Feldman:

On behalf of the Maryland Municipal Stormwater Association (MAMSA), I am writing to **OPPOSE** SB 688, which would prohibit the Maryland Department of the Environment (MDE) from allowing any pollution reduction credits associated with a stream restoration project by itself (p. 6, l. 1-3), add requirements to stormwater management plans involving in-stream construction or the mechanical alteration of a stream (p. 7, l. 1-11), and tighten the requirements for stream and floodplain restoration under the Whole Watershed Act (MD Code ENV. Title 18, Stream and Floodplain Restoration Projects) (p. 11, l. 7-13; p. 12, l. 16 - p. 13, l. 3) which the General Assembly passed just two years ago.

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.

MAMSA strongly supports stream restoration projects as a tool to help recover the hydrological and ecological functions of streams that have been damaged over time by land development. These projects have been thoroughly vetted in the Chesapeake Bay Watershed by multiple Chesapeake Bay Program Expert Panels that represent a broad scientific community. MAMSA Members stand by the implementation of these projects based on their positive impacts to the natural environment.

MAMSA Members rely on having stream restoration projects as an option as they seek to comply with MDE-issued municipal separate storm sewer system (MS4) permits. The 11 large and medium MS4 permittees, the 35 small municipal MS4 permittees, and dozens of state and federal permittees must all comply with mandatory restoration requirements meant to reduce nutrients and sediment to the Chesapeake Bay. Legislation that strips permittees of this option or increases the requirements associated with these projects (e.g., adding requirements for a stormwater management plan to consider non-stream-disturbing stormwater management practices) will not only **drive up costs**, which are paid by **your constituents and our citizens**, but will deprive local communities of needed improvements to these stream corridors.

For these reasons, MAMSA urges the Committee to vote **NO** on SB 688. Please feel free to contact me with any questions at [Lisa@AquaLaw.com](mailto:Lisa@AquaLaw.com) or 804-716-9021.

Sincerely,

A handwritten signature in blue ink that reads "Lisa M. Ochsenhirt".

Lisa M. Ochsenhirt  
MAMSA Deputy General Counsel

cc: Education, Energy, and the Environment Committee Members, SB 688 Sponsor