

**House Committee Hearing – Environment and Transportation  
March 11, 2026  
Maryland Department of Environment – HB 1465**

Dear Delegates Terrasa, Lehman, and Ruth, and members of the Committee,

My name is Kirk Mantay. On behalf of Baltimore County-based Green Trust Alliance, a nationally accredited land trust and conservation organization devoted to land and water access for all, and stronger coastal communities and habitats for everyone, **we are writing in opposition to this bill.**

As Green Trust's executive director and CEO, a certified professional wetland scientist since 2005; a Maryland Qualified Forest Professional since 2002, a Baltimore City Master Gardener, and a proud Baltimore City resident since 1999, I was disappointed to see this Bill proposed. I'm proud to have received multiple degrees from the nation's leading fish, wildlife, and natural resources programs and after spending the first 18 years of my career building all manner of environmental projects, and the following 10 years building programs that accomplish more of the same, I am considered a subject expert on where stream projects are beneficial, and even more so, how stream projects are actually put in the ground, sensibly and sustainably, for an effective use of taxpayer dollars. I am excited and humbled to share my expertise with the Committee. In the last 28 years I've designed, built, and planted hundreds of wetlands, rain gardens, stream restoration projects, and even adaptive fishing and hunting access facilities. I have planted thousands upon thousands of trees and *there is simply so much more to do*. And "faster than ever" is not good enough.

Green Trust Alliance has focused our efforts for the last 26 years in communities who have the least historic water access, and the fewest advocates for community resources like fishable streams, safe and stable shorelines, and beautiful rain gardens to keep the sidewalks dry and safe. Our partners are MDE, DNR, the City of Baltimore, and over a dozen county parks agencies..... but our partners are also communities in Curtis Bay, houses of faith in East Baltimore, and even dogwalkers in Catonsville's and West Baltimore's historic cemeteries for workers – informal green spaces so often neglected by outside advocates and leaders. It's in these spaces that so many positive things – including rain gardens, new trees, and stream restoration – can happen with a community's partnership and trust.

In our opinion, this Bill, if passed, would create a significant and undue hardship for historically under-resourced communities with highly degraded watersheds, and their cash-strapped local jurisdictions who need access to the conservation community's entire portfolio of water pollution reduction projects and potential funding sources. Tree plantings. Rain gardens. Stream restoration. These are all tools that are needed on the landscape, and frankly we should see them all together more often, as the recent Whole Watershed Act promised it would model.

To that point, only two years ago, many of the advocates of this bill stood in this building before you, and took credit (and perhaps a victory lap) for the passage of the Whole Watersheds Act, which made Maryland the most difficult state in the nation to receive permits for habitat restoration and enhancement activities that involve a stream. Viewed from another angle, it means that new stream restoration projects undertaken in Maryland have undergone more scrutiny and levels of review than similar work anywhere else in the USA. We're finding ways to get the work done, in partnership with regulatory agencies.

However, adding even more barriers to landowners, communities, and local governments who deserve access to the entire suite of pollution reduction methods, is not going to help Maryland comply with its Chesapeake Bay restoration obligations in a timely manner. And this Bill, if made law, would do just that. The alternative practices suggested in this legislation – as mandated in this Bill - would require the City and other Counties to acquire land access for these thousands of small projects from thousands of landowners who generally will not agree to donate portions of their taxed property to this change in land use.

Of course, this kind of approach to capital projects usually ends with the same communities and residents getting pinched and boxed in, with no action left to take, and feeling like the local leadership is not there for them.

This Bill explicitly seeks to bar our municipalities, fiscally overburdened due to current federal priorities, from considering project costs in their Bay Restoration project prioritization – making project selection “*if money were no object*,” – this is an exercise of high privilege. This thinking exacerbates, and does not relieve, environmental inequity, in an era where local dollars for capital projects are quite limited already.

This Bill seeks to restrict municipalities from choosing their methods of complying with MDE and EPA regulations – a legal premise that, applied to this very issue, has failed dozens of times in Maryland courtrooms, due to the *prima facie* injury to local governments’ rights to home rule, under Article XI of the Maryland Constitution.

Maryland’s local governments already have so many barriers to advancing our shared goals for clean water in a somewhat timely fashion, projects with community co-benefits, and projects that are sustainable and worthwhile investments. This Bill would make local compliance substantially slower and substantially more expensive to taxpayers. It would increase state agency and local jurisdiction MS4 noncompliance, which the state seeks to avoid, under their own EPA supervision.

**Green Trust Alliance respectfully urges the Committee members to oppose the passage of this bill. Thank you for your patience and diligence with this important topic.**