



March 9, 2026

The Honorable Marc Korman
The Honorable Michele Guyman
Members of the Environment and Transportation Committee
House of Delegates
Maryland General Assembly
250/251 Taylor House Office Building
6 Bladen Street
Annapolis, Maryland 21401

Oppose HB 1465 Environment - Stream and Floodplain Restoration Projects - Requirements and Limitations

Dear Chair Marc Korman, Vice Chair Michele Guyton, and Members of the Environment and Transportation Committee:

On behalf of the Metropolitan Washington Council of Governments (COG), we share the Committee's commitment to improving water quality and protecting communities in the Chesapeake Bay watershed. COG represents local governments that use stream restoration, alongside upland stormwater practices, as an important tool to advance Chesapeake Bay Watershed Agreement goals and to comply with Municipal Separate Storm Sewer System (MS4) permit requirements. We appreciate the intent to ensure restoration projects are effective and accountable; however, we are concerned HB 1465 would limit local governments' ability to deliver timely, cost-effective improvements. For these reasons, COG respectfully requests an unfavorable report on HB 1465.

Local governments need flexibility to use a balanced portfolio of upland BMPs and stream restoration to deliver the greatest water-quality and infrastructure benefits per public dollar. These practices together include strategies to slow down and filter stormwater, such as green infrastructure practices, and stream restoration practices to address erosion, sediment concerns and restore degraded streams. Without near-term intervention, these streams can continue to deteriorate and erode, often damaging critical infrastructure and increasing water pollution. This can happen even in watersheds where best management practices have been installed in upland areas to lessen stormwater flows. COG supports stream restoration, as supported and approved by the Maryland Department of the Environment (MDE) and the U.S. EPA Chesapeake Bay Program.

COG also supports efficient, implementable planning requirements that direct limited local funds to on-the-ground restoration rather than added process and delay. The proposed bill adds additional requirements for stormwater management plans, increases alternative analyses for projects, and rules out the consideration of cost as a barrier to pursuing certain projects. The proposed bill would also require a project to be monitored for five years before granting stormwater credits, severely limiting local governments' ability to receive timely

nutrient and sediment reduction credits and to comply with MS4 permit requirements. Neither the Chesapeake Bay Program nor its partners recommend a five-year monitoring period prior to receiving credits.

COG would welcome the opportunity to work with the Committee, MDE, and other partners to strengthen transparency and performance for stream and floodplain restoration projects while preserving practical, science-based pathways for MS4 compliance. We remain concerned that HB 1465, as drafted, could delay needed restoration and make it harder for local governments to achieve timely nutrient and sediment reductions. We respectfully ask for an unfavorable report on HB 1465.

Respectfully,

Steve Bieber

Steve Bieber
Water Resources Director
Metropolitan Washington Council of Governments