

# PATUXENT RIVERKEEPER®

An Open Letter to Environmentally Concerned Citizens:  
URGENT AND TIME SENSITIVE!



Iron Flocculate in "Restored" Wetland

## First some definitions.

**Mitigation sites:** The State of Maryland has a shortage of "mitigation sites". Mitigation sites are supposedly used to compensate for--and balance out environment harms created in one place, by making environmental improvements in an entirely different place. On the face of it, that is an absurd trade-off. Mitigation banks are literally an amenity provided by a third party (sometimes governmental) in order to make it easier and more efficient for builders to supposedly mitigate the environmental harms caused by their construction activity potentially anywhere in the State. *In effect Mitigation*

*banks allow construction projects elsewhere to proceed and often cause local environmental destruction.*

**Restoration sites:** Generally, restoration sites are supposed to be places where environmental damage has previously occurred, such as erosion from stormwater runoff and a local project is undertaken to remediate the problems, upgrade the conditions or repair the damage.

Here is the problem brought to our attention by residents living near some of these sites: Often these types of restoration projects are designed for municipalities to take advantage of various environmental “credits” they can claim for making environmental improvements and reducing the accelerated pollutants caused by deeply damaged sites. In other instances, projects can address stormwater, flooding and or other environmental consequences caused by earlier bad practice such as lack of stormwater control - but often no attention is given by designers to the root causes of the damage (such as stormwater from impervious surfaces like roofs and roads which firehoses into streams); the overall environmental destruction in the footprint of the project, or the aesthetics or sense of place concerns raised by residents near these sites. People who live next door to the sites and the surrounding communities generally report a lack of any benefits to their quality life or the environment. What is taken away from the community in terms of the loss of forested areas, general environmental degradation, and loss of ecosystem services has left residents deeply disappointed and upset. These projects are designed to please the engineers, municipal clients, planners, budget analysts, and the for-profit restoration business community... as far as the 'profit motives for launching these projects. In many instances these projects greatly alter the landscape, damage the remaining natural ecology, the natural foliage and surroundings-- and too few of them actually seek to restore the job site to its original unspoiled or pre-restoration condition. Lake Elkhorn and the surrounding streams need restoration to compensate for degradation created over time by surrounding growth and development, but the mitigation aspects of a recently proposed project would make it more invasive, and destructive than is necessary. These two intertwined ideas (Restoration versus Mitigation) need to be separated. The project currently planned needs to be rethought in order to enhance and preserve the existing ecology rather than changing it utterly.

Here are some images from recent re-engineered projects in Columbia that left the residents worse off than before:



**Newly Engineered Wetlands in the Stream Corridor**

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**Restoration  
Technique  
called an  
Oxbow**



**Newly  
Restored  
Stream  
Plantings (the  
red is from  
Iron in the  
groundwater)**

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**Here is the problem:**

A mitigation bank in Columbia, MD is being proposed by the Davey Resource Group in Kent, Ohio that will likely have enormous consequences and impacts on the surrounding ecology. A permit is required from the US Army Corps of Engineers. The plan is to take a relatively healthy ecosystem and completely re-engineer it--in order to exploit its mitigation potential. This project, if approved by USACE and the Maryland Department of the Environment, will allow destructive so called "stream restoration" projects not just in Columbia but across the State of Maryland. The primary purpose of the mitigation bank is not to repair local damage to the environment, but to facilitate wholesale damage (economic development) in some other place plus turn a profit for the mitigation bank vendor. That's why they need a mitigation bank--to create fresh opportunities to build and damage ecosystems throughout the state in response to the demand for construction permits.

This latest proposed project calls for an approximate 6-mile-long Stream "restoration " primarily along the Elkhorn Branch Trail through flourishing mature forests, fertile wetlands and critical forest habitat for breeding pairs of interior dwelling species of birds which are on the decline in Maryland per the DNR. The 133-acre easement would allow for up to 63 acres of tree removal - 50 feet on each side of over 33000 feet of streams.

The wisdom of converting a relatively healthy wetland site into a heavily engineered project

aimed at supporting more construction in the watershed is non-existent and of no local public benefit. We at Patuxent Riverkeeper object to these sorts of projects as do many citizens/residents who will live with the aftermath. Columbia needs true stream remediation and restoration--NOT an incubator for mitigation construction growth!

*Newly Restored Stream Connecting to the Engineered Floodplain*



*These projects do not address the main contributors to silt, sediment, and pollutants entering the stream, unmitigated stormwater runoff.*

## What can you do?

Please ask the Army Corps of Engineers and the Maryland Department of the Environment to deny the permits on both projects. Urge local government to conceive and build projects aimed at restoring environmental quality locally and emulating the natural conditions at this sites with the native wildlife, foliage and other ecology intact.

Please send your public comments expressing your opposition and concerns to [Kelly.neff@maryland.gov](mailto:Kelly.neff@maryland.gov) AND ALSO [john.j.dinne@usace.army.mil](mailto:john.j.dinne@usace.army.mil)

Referencing application number -  
NAB-2021-60426 ( DRG MD UMBI & Lake Elkhorn Mitigation Bank )

**Comments must be received by January 6th, 2022.**

For more information email - [protectourstream@gmail.com](mailto:protectourstream@gmail.com)  
Facebook: [Protect Our Stream Long Reach | Facebook](#)

**Click here for more official information about the project** ([link to an official project web page](#)).

**Thank you for caring about Columbia's remaining forests and streams!**

If interested, you can also copy your email and or send your comments to our local and state lawmakers and leaders asking them to please consider opposing the proposed establishment of the Lake Elkhorn compensatory mitigation bank project .

\* These comments will be available to the public, including your contact information if listed in the body of your email , also your email address at the top of the email page \* Please review individual websites for more details and alternate contact methods\*

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