

June 30, 2021

City of Gaithersburg

Dear Mayor and City Council:

Seneca Creek Watershed Partners is a local nonprofit organization dedicated to protecting and improving the ecological health of the Seneca Creek Watershed. As such, we are a major stakeholder in the Solitaire Court/Longdraft Branch tributary stream restoration project at Diamond Farms Park.

The restoration plan is a huge "natural channel design" construction project with a proposed impact of 5 acres. The disturbance corridor is 80-140 feet wide with 3 access roads and 4 staging areas and regrades and reroutes 2200 feet of stream. The design removes **3.14 acres** of mature, healthy, riparian forest ecosystem that **cannot be replaced** in our lifetime. In order to protect such a valuable, and increasingly rare, ecosystem, any work must be approached with **far more care and precision** than the heavy-handed method proposed.

We understand the City's obligation to meet its MS4 permit requirements under the Clean Water Act. Stream restoration is **one of many** tools that can be used to meet the permit requirements. The stated goal of the project is to reduce sediment loading and stabilize the eroding banks. However, poor water quality and unstable banks are **symptoms** of excess pavement and outdated or nonexistent stormwater controls upstream. Treating the downstream symptoms is an exercise in futility if upstream **causes** are not addressed. In fact, upstream of the project area is an unstable section not addressed.

The City's master plan sets forth goals for a healthy environment such as greenways, tree canopy, urban heat islands, climate change resilience, ecological diversity, public parks and open space. The project as designed is **wholly counterproductive** to these goals.

SCWP therefore **kindly requests the City Council to modify the plan** to better protect the irreplaceable forest ecosystems within the Seneca Creek Watershed, and throughout the City.

Thank you.

Sincerely,

Deborah Sarabia, M. En. President, Seneca Creek Watershed Partners Gaithersburg, MD 20877