August 5, 2016

Via First-Class and Electronic Mail

Assistant Attorney General  
U.S. DOJ – ENRD  
P.O. Box 7611  
Washington, D.C. 20044-7611  
pubcomment-ees.enrd@usdoj.gov

Re: Proposed Modified Consent Decree in United States and the State of Maryland v. Mayor and City Council of Baltimore (Case 1:02-cv-01524-JFM)

To the Environmental Protection Agency and Maryland Department of the Environment:

Baltimore’s neighborhood streams, rivers, and Harbor receive failing grades year after year; highs levels of fecal bacteria in our waterways prevent safe swimming, fishing and boating; and chronic sewer backups threaten public health by contaminating homes and businesses. The City was required to fix Baltimore’s pipes and eliminate sewage leaks by January 1, 2016. However, a substantial amount of the work to fix the pipes remains incomplete and the sewer leaks continue. Without written explanation, the EPA and State have now proposed giving the City until 2033 to get the job done.

We are 1,239 individuals, including 784 Baltimore City residents, and 35 community, environmental, and health organizations who demand adequate and enforceable requirements to eliminate sewer overflows and protect our communities and waterways from raw sewage as soon as possible.

We respectfully request that EPA and MDE revise the proposed Consent Decree to:

- Require actual improvements in water quality after each phase of infrastructure work is completed. Require water quality monitoring and modeling of city waterways for indicators most closely associated with raw sewage discharges and human health threats, including fecal bacteria, nutrients, and sediment.

- Assist residents and institutions whose homes and properties have been damaged by basement backups caused by the City’s sewage system. At minimum, this should include rapid response and property cleanup by the City, financial assistance from the City with cleanup costs and property losses caused by backups, and prioritization of infrastructure projects that will benefit the communities experiencing the most backups.

- Require public notifications within 24 hours for all discharges or releases of raw sewage to parks, communities, and city waterways.
Require the City to provide detailed annual reports to the public on how it has spent taxpayer money on sewage infrastructure work under the Consent Decree. Reports should cover, at minimum, the amount of money raised by the City for this work, all expenditures on sewage infrastructure projects, and a description of exactly what was achieved by the projects.

Require the City to find and eliminate sources of sewage contamination in Baltimore's stormwater system by a date that is specified in the Consent Decree.

Include conditions ensuring that Baltimore’s neighborhood streams, rivers, and the Harbor meet standards showing that they are safe for public recreation, including swimming, fishing, and boating, by a date that is specified in the Consent Decree.

We also call on EPA and MDE to hold a public meeting, with at least 30 days’ notice, at which the agencies appear and explain their responses to the written comments submitted by the public during this public comment period.

Thank you for your attention and consideration of our comments.

Sincerely,

**Baltimore City Residents**

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Susan Gerlak, Baltimore, MD 21210
Esther Gibbs, Towson, MD 21204
Purnell Glenn, Middle River, MD 21220
Karen Gordon, Middle River, MD 21220
Amanda Graham, Pikesville, MD 21208
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Megan Anderson, Reisterstown, MD 21136
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MaryAnn Gregory, Westminster, MD 21158
Crystal Heintzelman, Westminster, MD 21158
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Taylor Smith, Eldersburg, MD 21784

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Peter Bryant, Bel Air, MD 21015
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Diane Roca, Columbia, MD 21044

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Serena Rockey, Tucson, AZ 85711
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Heather Robson-Griffin, Oak Harbor, WA 98277

Baltimore City Organizations

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Baltimore Green Space, Baltimore, MD 21213
Baltimore Tree Trust, Baltimore, MD 21210
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Belair-Edison Neighborhoods, Inc., Baltimore, MD 21213
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Clean Water Action, Baltimore, MD 21201
Friends of Herring Run Parks, Baltimore, MD 21214
Friends of Stony Run, Baltimore, MD 21218
Maryland Environmental Health Network, Baltimore, MD 21202
Master Gardeners, Bay-Wise Committee, University of Maryland Extension - Baltimore City, Baltimore, MD 21215
MedStar Harbor Hospital Green Team, Baltimore, MD 21225
Mondawmin Neighborhood Improvement Association, Baltimore, MD 21215
Mt. Winans Community Association, Baltimore, MD 21230
Old Goucher Community Association, Baltimore, MD 21218
Robert W. Coleman Community Organization, Baltimore, MD 21215
United Workers, Baltimore, MD 21218
Westport Neighborhood Association, Baltimore, MD 21230
Your Baltimore Community Development, Baltimore, MD 21213
Greenmount West Community Association, Baltimore, MD 21202

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Assateague Coastal Trust, Berlin, MD 21811
Back River Restoration Committee, Inc., Essex, MD 21221
Baltimore Canoe and Kayak Club, Severn, MD 21144
Community Engagement, Environmental Justice, and Health (CEEJH), Maryland Institute for Applied Environmental Health, School of Public Health, University of Maryland-College Park, College Park, MD 20742
Green Towson Alliance, MD 21212
Gunpowder Riverkeeper, Monkton, MD 21111
Interfaith Partners for the Chesapeake, Annapolis, MD 21403
Maryland League of Conservation Voters, Annapolis, MD 21401
Trout Unlimited, Maryland Chapter, Towson, MD 21204
Trout Unlimited, Mid-Atlantic Council, Towson, MD 21204
Midshore Riverkeeper Conservancy, Easton, MD 21601

Sierra Club Maryland Chapter, College Park, MD 20740
South River Federation, Edgewater, MD 21037
Waterkeepers Chesapeake, Takoma Park, MD 20913

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Potomac Riverkeeper Network, Washington, DC 20036