



January 20, 2021

Raymond Bahr
Maryland Department of the Environment
Water and Science Administration
1800 Washington Boulevard
Baltimore, Maryland 21230

Mr. Bahr:

The Waterfront Partnership of Baltimore (WPB), a Business Improvement District located in Baltimore's Inner Harbor, is pleased to receive and review the draft of Maryland's proposed Municipal Separate Storm Sewer System and Discharge Permit (MS4) for Baltimore City. WPB works closely with large businesses in downtown Baltimore who are committed to improving and promoting the Baltimore Harbor. Through our Healthy Harbor Initiative, we have established a strong working relationship with the Baltimore City Department of Public Works (DPW) and we fully support the work that DPW continues to perform to ensure that our neighborhoods and waterways are clean and healthy.

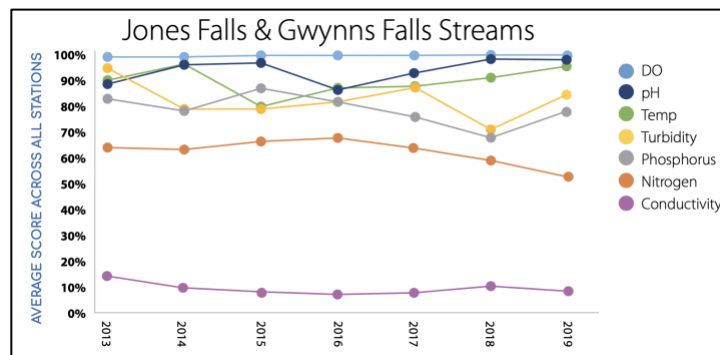
WPB's primary concern with the MS4 permit is that it fails to include either a minimum requirement for the use of Green Stormwater Infrastructure or limitations for the reliance on any single approach for meeting the pollution reduction goals of the permit. Specifically, WPB is concerned that the Baltimore City Department of Public Works will predominantly use street sweeping to meet the permit requirements.

Five years ago, the 2015 permit required the City to treat 20% of its impervious surface to reduce stormwater pollution. DPW prepared an implementation plan that showed the City's intent to use a variety of projects and programs, including Green Stormwater Infrastructure, stream restoration, street sweeping, inlet cleaning, and partnerships with developers and NGOs. The reality is that the City used street sweeping to meet 90% of the treatment requirement and implemented very few of the dozens of Green Stormwater Infrastructure projects identified in their 2015 MS4 plan.

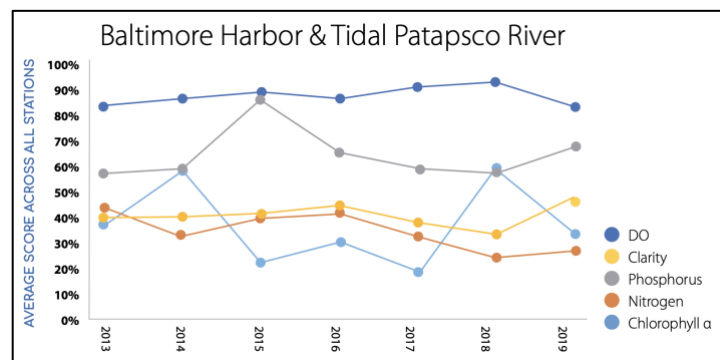
WPB has been and continues to be very supportive of DPW's expanded street sweeping. However, we recognize that street sweep should be used in conjunction with other approaches for treating polluted stormwater, not in place of them. This new MS4 permit requires DPW to maintain its existing levels of treatment under the prior permit as well as treating an *additional* 20% of the City's impervious surfaces. That means existing street sweeping will continue. But in order to meet the next 20% requirement, we recommend that the permit require the City to focus its efforts on Green Stormwater Infrastructure as opposed to even more street sweeping. This can be done by limiting the amount of credit DPW can claim for any single practice while also providing a minimum requirement for the use of Green Stormwater Infrastructure.

Not only would the implementation of Green Stormwater Infrastructure meet the requirements of the MS4 permit, it would also provide a myriad of other benefits that can improve the quality of life for Baltimore residents. These benefits include reduced localized flooding, lower summer temperatures and increased shade, improved air and water quality, increased home values and improved community cohesion, and improved public health.

Baltimore City and the State of Maryland have invested a lot of public resources into fixing the City's sanitary sewer and trash issues and, while there is still much work to be done, there have been significant measurable improvements in those metrics. However, there has not been a similar investment in Green Stormwater Infrastructure and monitoring results produced by Blue Water Baltimore have shown no significant improvement in ecosystem health over the last seven years:



Ecosystem Health Scores for the Jones Falls and Gwynns Falls Stream (higher the score equal better ecosystem health)



Ecosystem Health Scores for the Baltimore Harbor and Tidal Patapsco River (higher the score equal better ecosystem health)

The MS4 permit is the legal lever that can compel jurisdictions like Baltimore City to focus on Green Stormwater Infrastructure. One way to do this is by placing a cap on how much a single treatment approach, such as street sweeping, can be used to meet the new requirements. For example, a 75% cap on street sweeping credit, supported by a



minimum Green Stormwater Infrastructure requirement, would result in a significant increase in the installation Green Stormwater Infrastructure in Baltimore City. Alternatively, the 40% minimum requirement for Green Stormwater Infrastructure advocated for by the Choose Clean Water Coalition would have a similar impact.

Thank you for the opportunity to provide this feedback on Baltimore City's Draft MS4 permit.

Sincerely,

A handwritten signature in black ink that reads "Adam W. Lindquist".

Adam W. Lindquist
Director, Healthy Harbor Initiative
Waterfront Partnership of Baltimore