

## CITY OF BALTIMORE

BRANDON M. SCOTT, Mayor



## DEPARTMENT OF PUBLIC WORKS

Matthew W. Garbark, Director  
Abel Wolman Municipal Building, 6th Floor  
200 N. Holliday Street  
Baltimore, Maryland 21202

December 15, 2025

### VIA ELECTRONIC MAIL

Ms. Alice Volpitta  
Blue Water Baltimore  
1801 E. Oliver Street  
Baltimore, MD 21213

RE: Baltimore City Response to Revised Phase II Plan Public Comments

Dear Ms. Volpitta:

Thank you for sharing Blue Water Baltimore's ("BWB's") comments regarding the City of Baltimore's ("City's") revised Phase II Plan ("Plan") for the Modified Consent Decree ("MCD"). We value all opinions and perspectives so that we can find innovative solutions to improve water quality for the Baltimore region. We all share a common objective - safeguarding public and environmental health and we appreciate your feedback to achieve this shared goal. In the interest of public transparency and to further explain the complexities of the revised Plan, this letter provides detailed responses to each of BWB's comments.

**Comment 1: The Phase II Plan must achieve the established Levels of Protection and adhere to the 2032 final deadline outlined in the MCD unless formally modified through a transparent public process.**

Response: To be clear, the City is committed to meeting the levels of protection established in the Modified Consent Decree. As explained in the revised Phase II Plan, based on updated flow and rainfall monitoring data and hydraulic analyses, it is estimated that sanitary sewer overflows will be reduced by 94 percent compared to 2002 levels; however, additional system improvements are needed to meet the MCD levels of protection. Additional time, beyond the 2032 MCD deadline, is needed to complete design and construction work and to complete future flow and rainfall monitoring and hydraulic analyses to determine what, if any, future improvements are needed based on updated data and hydraulic conditions. The 2046 deadline proposed in the revised Plan is an acknowledgement of the City's very real logistical and financial constraints and the adaptive approach that we propose in the Plan. Since the City is not the sole arbiter to extend the MCD deadline, we will collaborate with our regulatory partners to determine a process to extend the MCD deadline.

**Comment 2: The Phase II Plan must effectively utilize and calibrate the hydraulic model with the best available precipitation data.**

Response: The City maintains a robust flow and rainfall monitoring program and recently expanded the number of monitoring locations to assess hydraulic conditions. The hydraulic model is re-calibrated on a regular basis to incorporate updated flow and rainfall data; therefore, the model includes recent rainfall patterns and wastewater collection system responses. The model was last calibrated in 2024.

The City acknowledges that comparisons between recorded overflow records and model simulations could be biased if there is significant sewer overflow underreporting. However, we see this challenge as a potential opportunity to collaborate with Blue Water Baltimore and other similar organizations to improve public education and participation. We would be very interested in further discussions with BWB.

**Comment 3: The Phase II Plan should specifically address the inequalities created by Baltimore County's noncompliance with their own Consent Decree for sewage overflows.**

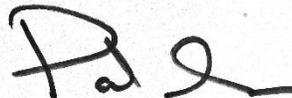
Response: The primary intent of the proposed improvements and future flow and rainfall monitoring and hydraulic analyses is to improve the water quality for the Baltimore region, which includes Baltimore City and Baltimore County. The City remains committed to continued collaboration with the County, including updating the City/County hydraulic model, hosting future joint technical/partnering workshops and further discussing fair cost-sharing agreements.

**Comment 4: The Phase II Plan should prioritize projects in communities most affected by sewage backups.**

Response: The City acknowledges that there are potential areas of improvement with the Basement Backup Expedited Reimbursement Program and Sewage Onsite Support Program. The City has discussed potential improvements with the U.S. Environmental Protection Agency and the Maryland Department of Environment. We believe better public outreach and awareness could significantly improve participation in both programs. This is yet another potential partnering opportunity between the City, Blue Water Baltimore and other similar organizations and we welcome further discussions with BWB.

Again, thank you for sharing your comments. Please contact me with any questions or concerns.

Best regards,



Paul Sayan, P.E.  
Deputy Bureau Head  
Bureau of Water & Wastewater  
Baltimore City Department of Public Works

cc: Matt Garbark/Baltimore City  
Alan Robinson/Baltimore City  
Steve Sharkey/Baltimore City  
Caitlin Rayhart/Baltimore City  
Brandon Hairston/Baltimore City