



November 13, 2025

Matthew W. Garbark, Director
Baltimore Department of Public Works
200 N. Holliday Street, Baltimore, MD 21201
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Phase II Plan of the Modified Sanitary Sewer Consent Decree (MCD)

Dear Director Garbark,

The Friends of The Jones Falls (FJTF) is a 700+ member, volunteer-based organization incorporated in 2018 to support and sustain the quality of life and long-term stewardship of the central Jones Falls Stream Valley in Baltimore City and County. FJTF urges Baltimore City agencies to maintain the current Phase II Plan of the Modified Sanitary Sewer Consent Decree (MCD) to be met by December 31, 2030. Baltimore City DPW, Maryland DNR, National Fish and Wildlife Foundation, Chesapeake Bay Trust and more non-profit organizations are investing millions of grant dollars in clean water projects in Baltimore and surrounding areas-- extending the MCD would likely dilute those investments.

We appreciate the efforts City managers have undertaken to meet the current goals of the MCD. Extending the deadline to 2040 is extremely ill-advised in the face of the aging sanitary sewer infrastructure throughout the city. It's only going to get more expensive to mitigate sanitary sewer failures, including in communities most affected by basement backups and risking the system becoming unmanageable. More particularly, we believe sanitary sewage overflows (SSOs) in sensitive areas at the established Level of Protection outlined in the MCD is a particularly important goal to maintain rather than diminish.

In support of the Level of Protection, we think it is crucial for the City DPW to assemble a body of qualified professionals for independent technical review of the City's hydraulic model and SSO reporting. That technical review should include the most recent rainfall data rather than old data from 1991–2010, that leaves out recent extreme climate events like the 2018 catastrophic flooding in the Frederick Road corridor.

Alongside these recommendations we urge you to acknowledge the importance of a higher level of transparency and accountability by City agencies as their work progresses on this life-sustaining MDC, including the necessary, associated work by Baltimore County agencies. Thank you for your attention.

Sincerely,

Sandy Sparks, President
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CC: Mayor Brandon Scott
Baltimore City Council
Maryland State City Delegation
Maryland Department of the Environment
U.S. EPA, Region 3
Blue Water Baltimore