

Comment #	Reference	Comment
1	Appendix B	The Baltimore City Permit is overly reliant on street sweeping. Street sweeping is inconsistent (it's been vastly reduced during the pandemic) and results in several negative co-benefits to the community including decreased air quality, noise, and no parking requirements in predominantly underserved communities. Street sweeping as an alternative practice provides few co-benefits, unlike green infrastructure and ESD practices. A greater emphasis on providing ESD to the MEP should be part of the MS4 permit requirement. For one thing, Street Sweeping has been put on hold during the pandemic due to staff shortages, but ESD facilities work 24 hours, 7 days a week regardless of staffing.
2	Appendix B	It is not clear if the proposed 1,247 acres to be treated by Street Sweeping in Year 1 is additional to the street sweeping that is already being done to comply with the previous permit. Please clarify in the table notes that this amount is in addition to the current levels being done to meet the last permit.
3	Fact Sheet Page 3	The fact sheet states that the City has proposed a robust portfolio of programatic, upland, and in-stream BMPs for this permit term, but the overwhelming majority of restoration is met through street sweeping. Just 0.2% of the proposed year 1 work is related to upland restoration met by impervious surface reduction.
4	General	The list of Year 1 capital projects do not include any green stormwater infrastructure projects (GSI) and it's not clear how many GSI projects will be proposed in future permit years. GSI projects provide numerous environmental and community co-benefits including stormwater flow and volume control, reduction of heat-island impacts, aesthetic improvements, and habitat improvements. Compared to other MD jurisdictions, Baltimore City is uniquely and almost entirely urban. This certainly presents challenges, but also a great opportunity to implement GSI to realize these co-benefits to both water quality improvements and the community. As a result, use of GSI practices should be more strongly encouraged in this permit.
5	General	Please consider setting a limit on the amount of restoration to be met through street sweeping to no more than 30% of the impervious area target
6	Page 11, Section F	The city has historically listed "partnerships" as one of its Citywide TMDL Stormwater Implementation Plan strategies. The primary way partnerships has been funded is through the Chesapeake Bay Trust Outreach & Restoration grant program. However, the level of funding committed to CBT is only \$200,000 annually, compared to over \$1 Million provided by other jurisdictions in the state. I recommend that the city should be required to increase that amount in order to accelerate implementation of ESD and green infrastructure projects in the community. Private property owners can implement BMPs faster and often more efficiently than a municipality. Plus there is a great deal of private land suitable for restoration given the proper incentives.
7	General	A greater emphasis on providing ESD to the MEP should be part of the MS4 permit requirement. For one thing, Street Sweeping has been put on hold during the pandemic due to staff shortages, but ESD facilities work 24 hours, 7 days a week regardless of staffing.
8	Appendix B	The list of Year 1 BMPs does not include any projects related to partnerships, but we know that several City non-profit partners have committed to restoration targets for year 1 and beyond that include tree planting, ESD facilities, and stormwater BMPs. The city should be encouraged to better support these partner projects by including a target metric for "partner projects" in each year's BMP list.