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January 19, 2018

*Via online submission form*

([publicworks.baltimorecity.gov/sewer-consent-decree/OM-comments](http://publicworks.baltimorecity.gov/sewer-consent-decree/OM-comments))

Rudolph S. Chow, P.E.  
Director, Department of Public Works  
City of Baltimore

RE: Public Comments on Baltimore Sewage Consent Decree Revised Operation and Maintenance Plan

Dear Mr. Chow,

The Environmental Integrity Project (“EIP”) and Clean Water Action (collectively, “Commenters”) respectfully submit these comments on the draft Revised Operation and Maintenance Plan (“Revised O&M Plan”) released for public comment by the City of Baltimore (“Baltimore” or “City”) on December 19, 2017. Paragraph 13 of the Modified Consent Decree, *United States v. Mayor of Baltimore*, No. JFM-02-1524 (D.Md. October 6, 2017) (hereinafter “Modified Consent Decree”), requires Baltimore to revise its O&M Plan to “provide for the proper operation and maintenance of the Collection System in order to minimize failures, malfunctions, and line blockages due to the lack of adequate preventative care.” Commenters appreciate the opportunity to submit these comments on the Revised O&M Plan.

As discussed in more detail below, the Revised O&M Plan fails to meet the clear requirements set forth in the Modified Consent Decree because it does not include a plan for prompt replacement or repair of laterals with acute or catastrophic failure causing Building Backups. In addition, Commenters are concerned that the process for identifying these laterals may fail to locate many laterals located in the City’s lowest-income neighborhoods. We have set forth recommendations below for additional measures that will make it less likely that laterals contributing to Building Backups in low income communities are overlooked. Finally, the City should clarify the criteria that it will use to prioritize laterals for repair or replacement and should maintain a publicly available list of laterals that have already been repaired or replaced.

### **Introduction**

These comments focus solely on the City’s draft Collection System Lateral Prioritization Program under Section 5 of the Revised O&M Plan.<sup>1</sup> It is our understanding that this program was developed to satisfy the requirements under Subparagraph 13(a)(iv) of the Modified Consent Decree pertaining to the requirement that Baltimore create a program to prioritize the

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<sup>1</sup> Revised O&M Plan at 5-1, 5-2.

replacement or repair of laterals causing Building Backups. This provision requires that the City's Revised O&M Plan include:

A program to prioritize corrective action in Collection System laterals that cause recurring Building Backups. The program must include: prompt repair or replacement of laterals with acute or catastrophic failures causing Building Backups; a plan to identify recurring Building Backups caused by problems in Collection System laterals; a list of the Collection System laterals to be prioritized for repair and/or replacement, updated annually; a map, updated annually of the location of the Collection System laterals awaiting repair/replacement under this program; and a description of the criteria to prioritize repair and/or replacement[.]<sup>2</sup>

The Revised O&M Plan, once it is approved by the Maryland Department of the Environment ("MDE") and the U.S. Environmental Protection Agency ("EPA"), "shall be incorporated into, and become enforceable under" the Modified Consent Decree.<sup>3</sup> MDE and EPA may approve, disapprove, or provide comments on the Revised O&M Plan, and, where the Revised O&M Plan is severable, these agencies may separately approve, disapprove, or comment on parts of the plan.<sup>4</sup>

**I. The Revised O&M Plan Must Include The City's Program for Repair and Replacement of Laterals with Acute or Catastrophic Failures Causing Building Backups**

The City has impermissibly failed to include an essential required piece of the Lateral Prioritization Program in the Revised O&M Plan. The Revised O&M Plan states that "[c]ollection system laterals with acute or catastrophic failures causing Building Backups will be remediated promptly as provided in the City's Emergency Response Plan ['ERP']."<sup>5</sup> The ERP has not yet been issued, though Commenters expect that the ERP will be made available for public comment next month. The Modified Consent Decree states that the Revised O&M Plan must include "[a] program to prioritize corrective action in Collection System laterals that cause recurring Building Backups. The program must include: prompt repair or replacement of laterals with acute or catastrophic failures causing Building Backups. . . ."<sup>6</sup> Thus, the program for repairing and replacing these laterals, when they are identified through the City's Lateral Prioritization Program, must be set forth in the Revised O&M Plan. The City may also identify laterals with acute and catastrophic failures when it responds to reports of Building Backups under the ERP, and it would be appropriate to include procedures for addressing these failures under the ERP. However, the City may not wholly shirk its duty to provide a program in the Revised O&M Plan for repair or replacement of laterals with acute or catastrophic failures causing Building Backups.

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<sup>2</sup> Modified Consent Decree, Para 13(a)(iv).

<sup>3</sup> *Id.*, Para 13(d).

<sup>4</sup> *Id.*, Para 20(b).

<sup>5</sup> Revised O&M Plan at 5-1.

<sup>6</sup> Modified Consent Decree, Para 13(a)(iv).

Commenters also believe that the repair/replacement program should include, but not be limited to, the following:

- (1) Identification of the time frame for repairing or replacing the laterals with acute or catastrophic failures. The Modified Consent Decree requires “prompt” repair or replacement.
- (2) Clarification of the statement in the current Revised O&M Plan that laterals can be removed from repair consideration “if there is no repair to be recommended.”<sup>7</sup> It is unclear what scenarios are described by this language. If the problem is clearly due to a deficiency in the lateral, and is causing Building Backups but the exact deficiency cannot be readily identified, then the City should replace the lateral in its entirety.

## **II. The City’s Proposed Method of Identifying Laterals Causing Building Backups May Overlook Laterals in Baltimore’s Low Income Neighborhoods**

In order to prioritize laterals that Baltimore will either replace or repair, the City must first identify locations of these deficient laterals. The identification of addresses with recurring Building Backups and the number of occurrences is a significant element of the City’s Lateral Prioritization Program because “[p]riority for repair will be given to addresses in the general vicinity of one another based on the incidence of Building Backups.”<sup>8</sup> According to the Revised O&M Plan, the City will identify addresses on a rolling basis that have experienced two or more Building Backups that were caused by problems in the lateral lines within the past three fiscal years.<sup>9</sup> The City intends to identify addresses “using data collected through service requests and work orders for lateral-based WICs<sup>10</sup> in Cityworks.”<sup>11</sup> The Baltimore City Department of Public Works has confirmed that the addresses generated through Cityworks will be based on (1) service requests from the 311 system and (2) work orders that generally also result from calls to the 311 system.<sup>12</sup>

Commenters are concerned about the potential inequitable effect on Baltimore’s lower income communities by relying solely on 311 data, and presents several recommends on how to ensure these communities can justly benefit from the City’s Lateral Prioritization Program.

- a. Data shows that fewer low income neighborhoods will benefit from the City’s proposed identification method compared to higher income neighborhoods.

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<sup>7</sup> *Id.* at 5-1.

<sup>8</sup> Revised O&M Plan at 5-2. As discussed in more detail below, this description should be revised to clarify it.

<sup>9</sup> *Id.* at 5-1.

<sup>10</sup> *Id.* at 5-1, nt. 2 (The Revised O&M Plan defines “WIC” as a water-in-cellar incident and notes that “not all WICs involve sewage, and not all sewage backups relate to issues in a Collection System lateral. The City evaluates records of WIC incidents to determine whether the WIC was a Building Backup, and if so, whether the Building Backup arose from an issue in the Collection System lateral.”).

<sup>11</sup> *Id.* at 5-1.

<sup>12</sup> Email from Paul De Santis, Baltimore City DPW to Sylvia Lam, EIP (Jan. 10, 2018), attached hereto as “Exhibit A”.

Although we agree that the City should use 311 data to identify the location of deficient laterals, we disagree that it should be the only source the City utilizes for this endeavor. We are concerned that relying solely on 311 system data may result in the exclusion of laterals in lower income neighborhoods from the list of laterals to be repaired or replaced. Appendix B of the Revised O&M Plan presents the addresses with associated laterals that have been slated for repair or replacement, ranked in the order of highest to lowest number of recurring Building Backups from fiscal year 2015 to fiscal year 2017, using data collected through customer service requests and work orders made through the City’s 311 system.<sup>13</sup> In Figure 1 below, EIP has mapped these addresses alongside the addresses with open and paid Building Backup claims submitted to the City Law Department from July 2015 through February 2017.<sup>14</sup> We present these addresses on a map that shows median household income in the City at the census tract level.

As is evident from Figure 1, although the addresses of properties that have submitted Building Backup claims are evenly distributed across Baltimore geographically, in contrast, properties that have been identified for Baltimore’s Lateral Prioritization Program are more concentrated in areas with higher median household incomes. The fact that fewer lower income households will benefit from the City’s program – if only 311 data is used - than their wealthier counterparts is also demonstrated in our graphs below (Figures 2 and 3) comparing the distribution of addresses against the median household income levels of the census tracts where the properties are located. Almost half of the addresses (48%) that submitted Building Backups claims during this similar time period are located in census tracts where the median household income is less than \$42,241, which was the median household income for the entire City of Baltimore in 2015 (see Figure 2).<sup>15</sup> However, in comparison, only a quarter of the addresses (27%) that have been identified to participate in the City’s Lateral Prioritization Program are located in census tracts with median household incomes lower than \$42,241 (see Figure 3).

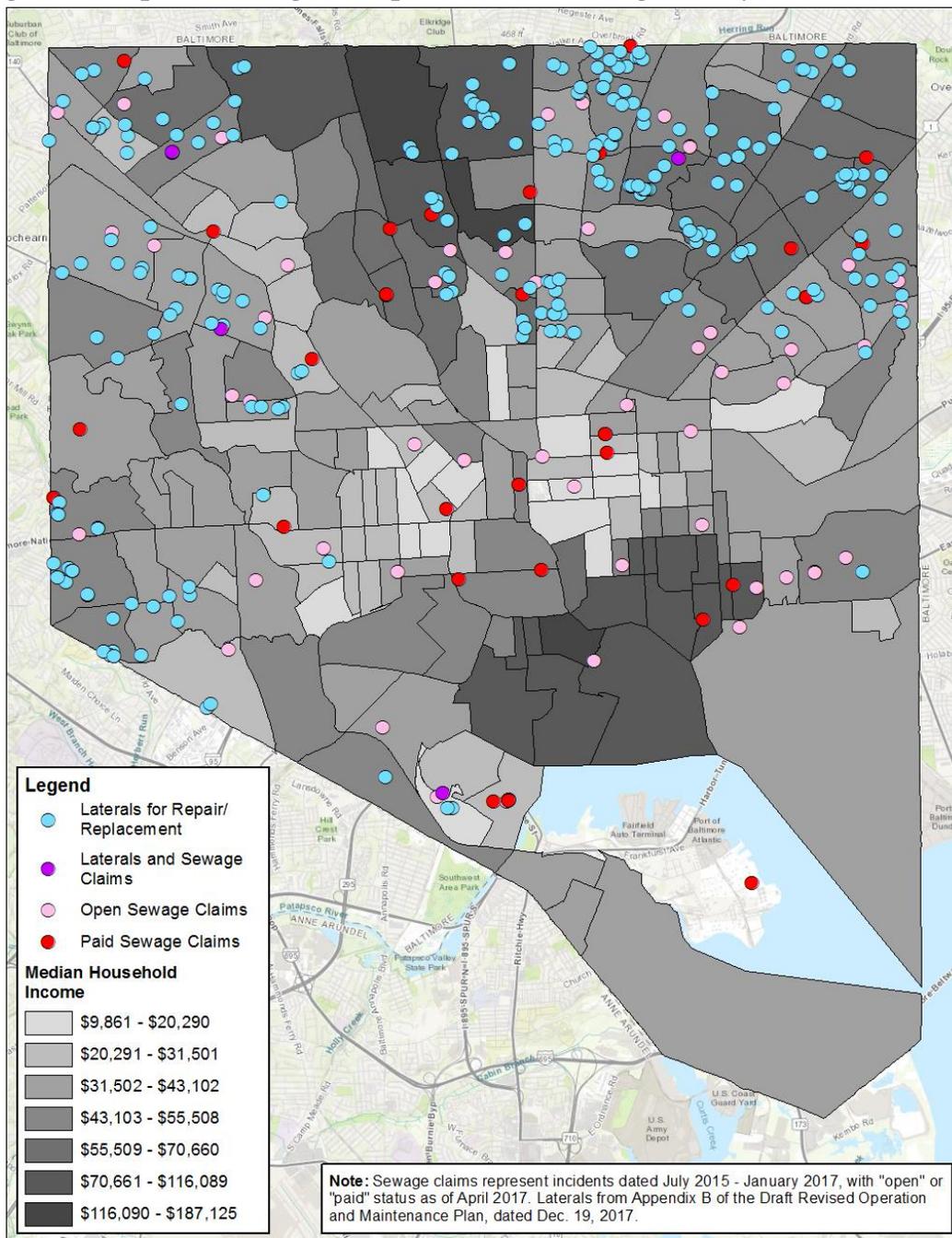
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<sup>13</sup> See Revised O&M Plan, App. B.

<sup>14</sup> See also List of Paid Building Backup Claims Submitted to the Baltimore City Law Department (July 1, 2015 through Feb. 28, 2017), attached hereto as “Exhibit B”; List of Open Building Backup Claims Submitted to the Baltimore City Law Department (July 1, 2015 through Feb. 28, 2017), attached hereto as “Exhibit C”. Note: EIP obtained these lists of claims made to the City for Building Backups caused by deficiencies in the City’s Collection System through a Maryland Public Information Act (MD PIA) request submitted to the City Law Department. EIP mapped claims that were considered “open” or “paid” by the City as of April 2017. The status of the “open” claims is current as of April 2017. EIP acknowledges that the status of one or more of these open claims may have changed since the City responded to the MD PIA request.

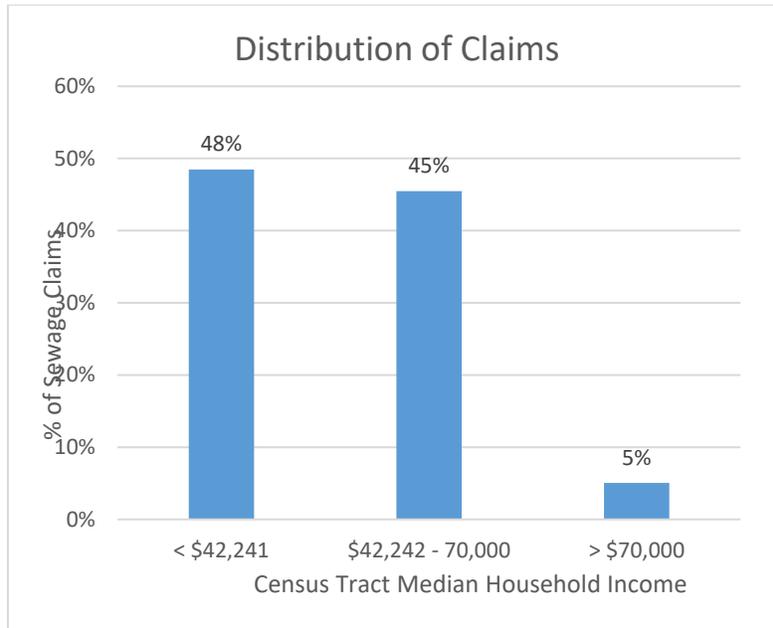
<sup>15</sup> U.S. Census Bureau, *Selected Demographic and Economic Data, 2011-2015 American Community Survey 5-Year Estimate*, available at <https://www.census.gov/geo/maps-data/data/tiger-data.html>.

**Figure 1. Map of Building Backups Identified Through 311 System and Claims<sup>16</sup>**

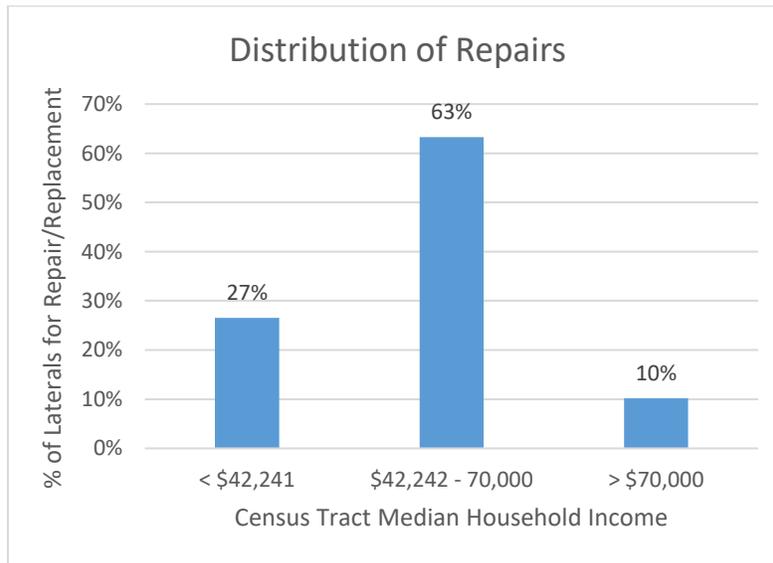


<sup>16</sup> Revised O&M Plan, App. B (addresses with laterals identified for repair/replacement); U.S. Census Bureau, *Selected Demographic and Economic Data, 2011-2015 American Community Survey 5-Year Estimate*, available at <https://www.census.gov/geo/maps-data/data/tiger-data.html> (median household income and demographic data); see also Exhibits B and C (lists of addresses with paid or open Building Backup claims from July 2015 through February 2017).

**Figure 2. Income Distribution of Addresses Identified Through Open/Paid Claims**



**Figure 3. Income Distribution of Addresses Identified Through 311 System**



Although we acknowledge that laterals may not be the cause of all the Building Backups identified through the open and paid claims, our analysis shows that reliance on only 311 data may result in this program providing fewer benefits to Baltimore’s lower income communities. Relying solely on calls made through the 311 system to identify addresses that have experienced Building Backups caused by laterals assumes that residents and property owners from all income levels are equally likely to make service requests through the City’s 311 system. However, a

study conducted in Boston found that residents of higher income census tracts are more likely to make—and thus receive—service requests, from that city’s government.<sup>17</sup>

In addition, even if a Baltimore resident or property owner does call 311 to report a Building Backup, it is unclear if 311 operators are trained to inform or recommend the option of submitting a service request to the caller. Moreover, residents and property owners may assume that making a service request through the City’s 311 system is redundant if they have already submitted a claim to the City Law Department.

The particular difficulties that may be experienced with Building Backups in low income communities are recognized in the St. Louis Consent Decree governing sewage discharges. This Consent Decree requires the prioritization of specific low income neighborhoods experiencing high occurrences of Building Backups for infrastructure improvement projects to alleviate the problem, such as sewer line repair and replacement.<sup>18</sup>

b. Recommendations

Given the potential disparate effect of using only 311 data to identify addresses for the City’s Lateral Prioritization Program, EIP recommends that the City supplement its use of 311 data with other sources and utilize other means to ensure lower income communities equitably benefit from the City’s program. More specifically, we recommend the following:

- i. *The City should incorporate data from submitted claims to supplement addresses acquired via the 311 system.*

As discussed above, by only using addresses acquired through the 311 system, the City may be leaving out from its Lateral Prioritization Program addresses that require connected lateral lines to be either repaired or replaced. Given that the City investigates the cause of Building Backups before paying claims submitted through the City Law Department, EIP recommends using this data to supplement the addresses obtained through calls made to the 311 system.

- ii. *The City should incorporate any existing data it possesses on the location of deficient laterals to supplement addresses acquired via the 311 system.*

The Modified Consent Decree requires Baltimore to “conduct an analysis comparing rainfall and flow data collected in the five years preceding the Date of Entry of this Consent Decree with existing data on the location and recurrence of known and reported Building Backups during the same period (excluding Building Backups in which the cause was identified

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<sup>17</sup> See, e.g., JAMES J. FEIGENBAUM AND ANDREW B. HALL, HOW HIGH-INCOME AREAS RECEIVE MORE SERVICE FROM MUNICIPAL GOVERNMENT: EVIDENCE FROM CITY ADMINISTRATIVE DATA (Aug. 12, 2015), available at [http://scholar.harvard.edu/files/jfeigenbaum/files/feigenbaum\\_hall\\_respublica.pdf](http://scholar.harvard.edu/files/jfeigenbaum/files/feigenbaum_hall_respublica.pdf) (This study combined a database on requests for municipal government services in Boston, Massachusetts with census information on local incomes to investigate the possible links between the economic resources of localities and their experiences with local government services. The study found that higher-income neighborhoods ask more from their local government and, in turn, receive more services.).

<sup>18</sup> Consent Decree, *United States v. Metropolitan St. Louis Sewer District*, No. 4:07-CV-1120 (E.D. Mo. Aug. 4, 2011) at 1.

as blockage or malfunction in the Lateral)...[t]o look at whether flow...correlate[s] with known and reported Building Backups at particular city blocks or other geographic locations in the City.”<sup>19</sup> If the City is using information from sources other than the 311 system to identify deficient laterals to exclude those Building Backups from this report, we believe the City should use this additional data to identify addresses for the Lateral Prioritization Program in order to fill any potential gaps in the 311 system data.

*iii. In future years, the City should incorporate information identified through programs developed to address Building Backups under the Emergency Response Plan.*

The Modified Consent Decree requires the City to establish, under the ERP, a Building Backups reimbursement plan<sup>20</sup> and contemplates the establishment of a “call center” relating to Building Backups.<sup>21</sup> We understand that no addresses of events have been identified as of now through these programs. However, the Revised O&M Plan should state that, once these programs are up and running, any laterals causing Building Backups that are identified through the calls or reimbursement requests submitted via these programs should also be added to the list of laterals that may be prioritized for repair under the Revised O&M Plan.

*iv. The Revised O&M Plan should include plans to train 311 operators to handle Building Backup calls and to educate the public on the importance of notifying 311 of all Building Backup occurrences.*

The City should ensure that 311 operators are properly trained to handle calls regarding Building Backups so that they can inform callers on the importance of reporting each Building Backup incident to the 311 system and to submit service requests. Likewise, the City Law Department should automatically generate service requests for addresses that have submitted a Building Backup claim to the 311 system, or at a minimum, inform claimants that they have a right to submit service requests to the City via the 311 system and on the importance of making these requests in addition to any submitted claims.

### **III. The City Should Clarify the Criteria it Will Use to Prioritize Lateral Lines for Repair or Replacement and Consider Prioritizing Lateral Lines Affecting the City’s Lowest Income Areas**

The Modified Consent Decree requires the City to include “a description of the criteria to prioritize repair and/or replacement” of laterals causing Building Backups in its Revised O&M Plan.<sup>22</sup> According to the Revised O&M Plan, “[p]riority for repair will be given to addresses in the general vicinity of one another based on the incidence of Building Backups.”<sup>23</sup> This description of the City’s criteria is unclear. It appears that the City will prioritize repair or replacement of Collection System laterals that cause Building Backups based on areas with

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<sup>19</sup> Modified Consent Decree, Para. 9(e).

<sup>20</sup> *Id.*, Appendix E.

<sup>21</sup> *Id.*, Para 16(a)(xi).

<sup>22</sup> *Id.*, Para 13a(iv).

<sup>23</sup> Revised O&M Plan at 5-2.

(1) greater concentrations of addresses that have experienced Building Backups, and (2) greater frequency of recurring Building Backups.

Commenters agree that these are appropriate criteria for prioritizing repair/replacement of laterals, although we suggest that the City also consider prioritizing laterals causing Building Backups in the lowest income areas of the City, as is required under the St. Louis Consent Decree (see discussion above). Residents of these areas are least able to shoulder the financial burdens of Building Backups. Once the City's procedures for identifying laterals causing Building Backups have been improved, the City should revisit the issue of including poverty as a criteria for prioritizing laterals for repair or replacement. Regardless, Commenters believe the City must clarify the prioritization criterion set forth in the current draft of the Revised O&M Plan.

**IV. The City Should Maintain a Publicly Available List of Laterals that Have Previously Been Replaced or Repaired**

The Modified Consent Decree requires the City to maintain “a list of the Collection System laterals to be prioritized for repair and/or replacement, updated annually.”<sup>24</sup> According to the Revised O&M Plan, this list will be “continually reviewed to remove any Collection System laterals that have been repaired through the program.”<sup>25</sup> We appreciate the City's commitment to keep this listed updated. However, instead of deleting the address entirely, the City should move addresses with completed laterals to a separate list that includes the date on which work on the lateral was completed. The City should also make this list publicly available on the Department of Public Works website so that the public can track the City's progress on the Lateral Prioritization Program.

Thank you for the opportunity to submit these comments.

Sincerely,



Sylvia Lam, Attorney  
Leah Kelly, Senior Attorney  
Environmental Integrity Project  
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Washington, D.C. 20005  
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<sup>24</sup> Modified Consent Decree, Para 13(a)(iv).

<sup>25</sup> Revised O&M Plan at 5-1.

Brent Bolin  
Chesapeake Regional Director  
Clean Water Action  
1120 N Charles Street, Suite 415  
Baltimore, MD 21201

*cc (via e-mail):*

Benjamin H. Grumbles  
Secretary of the Environment  
Maryland Department of the Environment  
[ben.grumbles@maryland.gov](mailto:ben.grumbles@maryland.gov)

Nina Rivera  
Senior Assistant Regional Counsel  
U.S. Environmental Protection Agency, Region III  
[rivera.nina@epa.gov](mailto:rivera.nina@epa.gov)

# Exhibit A

**From:** [Desantis, Paul](#)  
**To:** [Sylvia Lam](#)  
**Cc:** [Leah Kelly](#)  
**Subject:** RE: Baltimore sewage O&M Plan question  
**Date:** Wednesday, January 10, 2018 6:06:09 PM  
**Attachments:** [image001.png](#)

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I apologize for the delayed response. The extended cold spell and numerous water main breaks were keeping everyone quite busy.

As you noted, water in cellar data is identified using data collected through service requests and work orders. Cityworks gets service requests from the 311 system and work orders are generated through our maintenance division. Generally, work orders will result from calls to the 311 system, but there are exceptions.

We are not using claims submitted to the Law Department if there was not a corresponding 311 call or work order. There is an issue with verification if there was no contemporaneous investigation.

Cheers,



Mayor  
Catherine E. Pugh



Director  
Rudolph S. Chow, P.E.

**Paul N. De Santis**  
Chief of Legal & Regulatory Affairs

Baltimore City Department of Public Works  
200 Holliday Street, Suite 203  
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*"To be a strong proponent and protector of our environment and the health and vitality of our communities" – DPW Vision Statement*

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**From:** Sylvia Lam [mailto:[slam@environmentalintegrity.org](mailto:slam@environmentalintegrity.org)]  
**Sent:** Friday, January 05, 2018 4:31 PM  
**To:** Desantis, Paul  
**Cc:** Leah Kelly  
**Subject:** Baltimore sewage O&M Plan question

Hi Paul,

Hope you enjoyed the holidays and are doing well. EIP is planning on submitting comments on the City's draft Operations & Maintenance Plan. My colleague Leah Kelly and I were hoping to discuss a

question we had pertaining to the plan's Collection System lateral prioritization program in order to inform our comments, and I was wondering if you could connect us with the right person to speak to.

We understand that the City identified addresses that have experienced building backups using data collected through service requests and work orders for lateral-based WICs in Cityworks. We would like to learn more about how the City collects this data and where the data originates from (e.g., from 311 requests? What about claims submitted to the Law Dept.?).

Would you be able to connect me with someone who can discuss this with me in the next week and a half, given that comments are due by January 20<sup>th</sup>? I appreciate any help you can provide us.

Thanks,  
Sylvia

**Sylvia Lam**  
**Attorney**  
**Environmental Integrity Project**  
**1000 Vermont Avenue, NW, Suite 1100**  
**Washington, DC 20005**  
**(202) 888-2701**

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**Exhibit B:**  
**List of Paid Building Backup Claims Submitted to the Baltimore City**  
**Law Department**  
**(July 1, 2015 through February 28, 2017)**

**Exhibit B: List of Paid Building Backup Claims Submitted to the Baltimore City Law Department  
(July 1, 2015 through February 28, 2017)**

<b>Date of Incident</b>	<b>Close Date</b>	<b>Paid Total</b>	<b>Location of Building Backup</b>
10/3/2016	11/15/2016	\$ 85.00	RADNOR RD. 402
2/24/2016	2/24/2017	\$ 1,706.52	COOKS LANE 1117
2/18/2016	5/31/2016	\$ 384.97	CURLEY STREET 1218 S.
2/13/2016	6/23/2016	\$ 1,209.90	COLDSPRING LANE 501 W.
2/2/2016	10/12/2016	\$ 350.00	BROADWAY 1313 N.
2/1/2016	11/18/2016	\$ 3,000.00	TOLNA STREET, 602
1/26/2016	4/25/2016	\$ 1,418.57	COOKS LANE 1117
1/5/2016	3/2/2016	\$ 2,000.00	WOODLEA AVENUE 4516
12/24/2015	6/14/2016	\$ 4,507.81	REISTERSTOWN ROAD 4829
12/22/2015	1/19/2017	\$ 3,000.00	BROADWAY 1604 N.
12/22/2015	8/4/2016	\$ 3,000.00	BROADWAY 1604 N.
12/22/2015	7/22/2016	\$ 3,000.00	BROADWAY 1604 N.
12/8/2015	7/13/2016	\$ 2,500.00	FALLSTAFF ROAD 3202
11/14/2015	12/30/2015	\$ 9,706.70	WOODLEA AVE. 4516
10/12/2015	3/2/2016	\$ 577.00	GLENMORE AVENUE 3800
9/8/2015; 1/21/2014; 4/13/2013; 9/17/2012	4/4/2016	\$ 49,500.00	REEDBIRD AVENUE 136
9/6/2015	4/19/2016	\$ 1,000.00	HILLENWOOD ROAD 2027
8/24/2015	6/23/2016	\$ 2,065.00	LEITHWALK & LIMIT

**Exhibit B: List of Paid Building Backup Claims Submitted to the Baltimore City Law Department  
(July 1, 2015 through February 28, 2017)**

<b>Date of Incident</b>	<b>Close Date</b>	<b>Paid Total</b>	<b>Location of Building Backup</b>
7/21/2015	11/5/2015	\$ 27,225.92	WOODLEA AVE. 4516
7/1/2015	2/22/2017	\$ 1,550.00	BARTWOOD ROAD 3717
<b>Total Claims: 20</b>	<b>Total Paid:</b>	<b>\$217,787.39</b>	

**Exhibit C:**  
**List of Open Building Backup Claims Submitted to the Baltimore City**  
**Law Department**  
**(July 1, 2015 through February 28, 2017)**

**Exhibit C: List of Open Building Backup Claims Submitted to the Baltimore City Law Department (July 1, 2015 through February 28, 2017)**

<b>Date of Incident</b>	<b>Location of Building Backup</b>
1/23/2017	BELVEDERE AVENUE 2041 E.
1/19/2017	RAYMONN AE. 4116
1/5/2017	FRANKFORD AVENUE 5516
1/3/2017	BELVIEU AVE. 4117
12/24/2016	MERVILLE AVE. 5603
11/26/2016	SHERWOOD AVENUE 1652
11/23/2016	CHARNWOOD RD. 5909
11/22/2016	GREENMOUNT AVENUE 1303
10/6/2016	POTOMAC STREET 124 N.
9/29/2016	ERDMAN AVENUE 3455
9/16/2016	ASHLAND AVE. 1205
9/13/2016	CEDARDALE ROAD 3402
9/12/2016	LEXINGTON STREET 2336 W.
8/27/2016	STEVENSON ST. 1466
7/29/2016	ELISON AVENUE 4704
7/27/2016	ANN STREET 315 S.
7/22/2016	5903 DAYWALT AVENUE
7/6/2016	LENTON AVENUE 1031
6/24/2016	DRUID HILL AVENUE 1925
6/18/2016	LOHRS LANE 3105

**Exhibit C: List of Open Building Backup Claims Submitted to the Baltimore City Law Department (July 1, 2015 through February 28, 2017)**

<b>Date of Incident</b>	<b>Location of Building Backup</b>
5/21/2016	WAXTER WAY 245
5/12/2016	SHELLBANKS ROAD 1108
5/7/2016	BANCROFT RD. 3403
4/26/2016	HOLLINS FERRY 2501 (LOWER SANCTUARY OF CHURCH)
4/20/2016	641 Macon Street, South
4/4/2016	Saint Benedict Street, 3378
3/23/2016	CLOVER ROAD 5729
3/8/2016	BOSTON STREET 3500
3/2/2016	REEDBIRD AVENUE 152
3/1/2016	BELVEDERE AVENUE 2047 E.
2/29/2016	REEDBIRD AVENUE 130
2/29/2016	REEDBIRD AVENUE 130
2/29/2016	REEDBIRD AVENUE 130
2/25/2016	ANNTANA AVENUE 4600
2/24/2016	REEDBIRD AVENUE 132
2/24/2016	CARDENAS AVENUE 3518
2/24/2016	REEDBIRD AVENUE 132
2/24/2016	DUNSTANS ROAD 602
2/24/2016	REEDBIRD AVENUE 132
2/21/2016	1317 W. Lombard Street

**Exhibit C: List of Open Building Backup Claims Submitted to the Baltimore City Law Department (July 1, 2015 through February 28, 2017)**

<b>Date of Incident</b>	<b>Location of Building Backup</b>
2/17/2016	ST. PAUL ST. 717-721
2/16/2016	SEQUOIA AVE. 3119
2/16/2016	FEDERAL STREET 2835 E.
2/4/2016	NORTHVIEW ROAD 1201
2/3/2016	CHERRY HILL ROAD 1012
2/2/2016	REISTERSTOWN ROAD 6935, 1ST FLOOR
2/2/2016	GREENMOUNT AVE. 3637
2/1/2016	TOLNA ST. 606
1/11/2016	COARNWALL STREET 421
1/5/2016	N. Chapel Gate Lane, 606
12/15/2015	MONDAWMIN AVENUE 3300
11/22/2015	OSWEGO AVE. 2624
10/14/2015	CLOVER ROAD 5729
9/30/2015	ELDERON AVENUE 5500 & 5600
9/29/2015	FAIT AVENUE 3919
9/15/2015	BUCKNELL RD. 5438
9/13/2015	UNION AVENUE 813
8/28/2015	UNIVERSITY PARKWAY 625 W.
7/22/2015	WASHINGTON STREET 2007 N.

**Total Claims: 59**