



March 23, 2026

David Goshorn and Kamil Williams,
Maryland Department of Natural Resources
580 Taylor Ave
Annapolis, MD 21401

RE: Request for Project Plans and Coordination on Closure of the Days Cove Landfill,
Gunpowder Falls State Park (53-LL, 63-LL)

Dear Deputy Secretary David Goshorn and Kamil Williams:

Thank you for the opportunities to meet and discuss both our concerns and the State's plans regarding the closure of the more than 40-year-old landfill at the Days Cove portion of Gunpowder Falls State Park. We appreciate the time and attention you and your team have dedicated to addressing this issue and working toward fulfilling the State's longstanding commitment to close the Days Cove Rubble Landfill as promptly and responsibly as possible.

Under the terms of the most recent lease, the landfill was scheduled to begin closure on December 15, 2025. Unfortunately, despite the expressed opposition of Baltimore County and Harford County leadership and strong concerns from surrounding communities and residents, the landfill operator is now seeking an extension and we are informed may not have taken the steps necessary to adequately prepare the site to begin closure as planned.

We understand that the purpose of our meetings during this short lease is threefold:

1. To determine whether and why a lease extension is necessary and, if so, the minimum time required to safely prepare the landfill to commence closure;
2. To allow time for Maryland Department of the Environment (MDE) to review the pending discharge permit so that any lease extension is consistent with that permit; and
3. To give all of us additional time to better understand one another's concerns and determine the most effective path forward together.

Since our first meeting, our discussions have consistently centered on several key priorities that we believe are essential to a successful closure process:

- Establishing a secure escrow account to fund closure and long-term monitoring of the site
- Developing clear closure project plans and timelines

- Strengthening monitoring and compliance oversight

With respect to the escrow account, we understand that the State does not currently control this account. Given its importance to ensuring that adequate resources are available for closure and long-term management, we strongly encourage the State to take steps to ensure that these funds are secure, transparent, and that the reported seven million in the account is fully sufficient to cover closure and post-closure obligations.

Closure planning should take a comprehensive approach that includes environmental assessment, clear engineering plans, long-term monitoring, and treatment obligations in perpetuity where necessary. We have discussed with you and representatives from Maryland Environmental Service (MES) the need for detailed project plans with defined milestones and timelines to guide the closure process with transparency.

Because the operator has long been aware of the lease's December 15, 2025 closure requirement, we strongly urge that any additional lease term be limited and focused solely on preparing the site for closure. From the community's perspective, an extension of no more than one year of additional operation—including the current five-month extension—would be appropriate. This request stands in contrast to the operator's proposal. If deficiencies in the landfill structure must be corrected prior to closure, we ask that these be addressed in a way that does not impose costs on DNR or taxpayers and request that any considerations be clearly documented and addressed within a comprehensive closure project plan.

In the areas of monitoring and compliance, we have shared our concerns, local knowledge, and recommendations based on our experience addressing environmental and community issues in the region. To strengthen oversight and provide additional confidence in the process, we encourage the State to move forward with several steps and provide timelines:

- Establish a contract with Maryland Environmental Service or another qualified independent entity to assist with landfill oversight, closure, and post-closure management, recognizing DNR's stated limitations in directly managing landfill operations.
- Obtain letters of consistency from relevant State entities given the sensitive environmental context of Days Cove, including:
 - Chesapeake Bay Critical Area Commission regarding compliance with Critical Area requirements during active operations and closure
 - Wildlife & Heritage Service concerning impacts to rare, threatened, and endangered species and sensitive habitats
 - DNR's Irreplaceable Natural Areas program, consistent with the Days Cove INA designation

In addition, we encourage establishing appropriate-level coordination between DNR and MDE regarding the discharge permit renewal, as DNR is the landowner. This coordination should

include consideration of a consent decree addressing current and future violations, as well as a clear no-discharge condition for treated leachate to ensure that local waterways are protected.

Addressing these areas would help provide certainty, transparency, and confidence that environmental protections and community interests remain central to the State's closure strategy. Our community remains deeply engaged in this process and looks forward to more concrete plans.

With our remaining meetings, we expect the opportunity to review more detailed closure planning and continue constructive discussions about how to achieve a responsible and timely closure of the Days Cove landfill.

Thank you again for your time, leadership, and willingness to engage in this process. We appreciate the opportunity to work together toward a solution that protects both Gunpowder State Park and the surrounding communities.

Sincerely,

Kathy Reiner Martin – **Council of Environmental Quality D5 Member**
Lindsay Crone – **Gunpowder Valley Conservancy**
Theaux LeGardeur – **Gunpowder RIVERKEEPER**
Bill Temmink – **Mad About Mud**, *a coalition of Bird and Gunpowder River waterfront communities*

CC:

Governor Wes Moore
State Treasurer Dereck Davis
Comptroller Brooke Lierman
Secretary Josh Kurtz, Department of Natural Resources
Secretary Serena McIlwain, Maryland Department of the Environment
Angela Crenshaw, Maryland Park Service Director
Rachel Temby, Maryland Park Service Deputy Director
Charles Glass, Maryland Environmental Services Executive Director
Sandra Hertz, Maryland Environmental Services Deputy Director
Timothy Ford, Maryland Environmental Services Managing Director Environmental Operations
Luke Terrell, Manager, Gunpowder Falls State Park
Mark Spurrier, Regional Manager, South Central Maryland Region