

**COG Talking Points for Bay TMDL Forum**  
**Friday, November 20<sup>th</sup>**

- 1. AFFORDABILITY – Reassess the cumulative costs of WIP implementation across both the wastewater and stormwater sectors, and whether ratepayers can bear the joint impact.**
- 2. REALISM OF STORMWATER PROGRAM IMPLEMENTATION– Examine the pace at which local governments can sustainably increase program capacity to implement stormwater retrofit projects. Support capacity analysis of private resources available for stormwater implementation, and lengthen regulatory schedules accordingly.**
- 3. SCHEDULE – As part of the 2017 mid-point evaluation process, examine whether the Bay TMDL’s 2025 deadline for achieving nutrient and sediment reduction targets is biologically (system lag time) and fiscally attainable.**
- 4. ADAPTIVE MANAGEMENT/HOLISTIC APPROACH – EPA and the states should consider impacts of the Conowingo Dam equilibrium, water quality lag time, and climate change impacts when assessing the feasibility of nutrient reduction targets and allocations.**
- 5. EQUITY: MAINTAINING PROMISED WASTEWATER CAPACITY – Local governments’ investment in nutrient reduction at their wastewater treatment facilities, under agreements that preserve long-term flow capacity, must be protected. Shortfalls in the nutrient reduction efforts of other sectors or other states should not be imposed on the wastewater sector.**
- 6. LOCAL VOICE – As major stakeholders in the Bay TMDL, local governments need to be directly involved in the 2017 mid-point assessment process, including discussions about schedule, equity, and Phase III WIPs.**