



February 23, 2022

Adam Ortiz
Administrator, Environmental Protection Agency Region 3
1650 Arch Street
Philadelphia, PA 19103

RE: Priority Applications for the Infrastructure Investment and Jobs Act Funds within the Chesapeake Bay Program

Dear Administrator Ortiz:

I am writing on behalf of the Chesapeake Bay and Water Resources Policy Committee (CBPC) of the Metropolitan Washington Council of Governments (COG) to provide our committee's suggestions for how EPA could best spend new funds arising from the Infrastructure Investment and Jobs Act of 2021. Our primary recommendations are to spend additional funding on the most effective nutrient reduction practices and to expand monitoring and research. These recommendations are based on the CBPC's four policy principles of (1) Use of Sound Science and Equity; (2) Water Infrastructure Funding; (3) Value of Water; and (4) Ensure Local Voice.

Specifically, we recommend using an approach like the existing "Most Effective Basins" grant program to target new infrastructure funding where it will yield the most impactful results. The Bay Program currently passes much of its funding to the states through implementation grants and other mechanisms. The existing distribution formulas should continue to be used to distribute baseline funding. However, new funding above the baseline should be spent where it is most needed, such as assistance to Pennsylvania agriculture in implementing nutrient and sediment control practices.

Some portion of the funds should also be spent on a variety of projects that enhance the science supporting the Bay TMDL. These include:

- Increased monitoring efforts, particularly shallow water monitoring, to support the Bay Program's heightened emphasis on the effects of climate change on Bay water quality.
- Targeted research efforts, such as more accurately quantifying the sources of nitrogen in urban areas and exploring how efforts to address flooding issues could also have water quality benefits.
- Expanded work to support best management practices (BMP) implementation, to include identification of dual-action BMPs effective for both quality and quantity control and how to use the new intensity-duration-frequency (IDF) curve information to better incorporate climate change risk into design specifications.

Administrator Adam Ortiz
February 23, 2022

- Specifications for effective reforestation of stream buffers following stream restoration.
- Continued support for high resolution land use analysis post 2025 to include LIDAR-based digital elevation mapping that can support a variety of local uses, particularly for flood resilience efforts.

We thank you for your consideration of these recommendations and look forward to continuing to work together on Bay restoration efforts.

Sincerely,



Amy Jackson
Chair, Chesapeake Bay and Water Resources Policy Committee

Cc: Radhika Fox, Assistant Administrator for Water
Michelle Price-Fay, Acting Director, and other heads staff, Chesapeake Bay Program
Catherine A. Libertz, Water Division Director, EPA Region 3