



Metropolitan Washington
Council of Governments

August 27, 2018

Benjamin Grumbles
Secretary, Maryland Department of the Environment
Chair, Principals' Staff Committee
Maryland Department the Environment
1800 Washington Boulevard
Baltimore, MD 21230

Re: Conowingo Dam WIP Process

Dear Secretary Grumbles,

I am writing as Chair of the Metropolitan Washington Council of Governments' Chesapeake Bay and Water Resources Policy Committee to express our support for the Guiding Principles for the Conowingo WIP and for designating specific nutrient reduction obligations for Exelon. We also are requesting that the Bay Program ensure that there is early and active local government participation in the Conowingo WIP planning process so that the implementation of the Conowingo WIP works in concert with Phase III WIPs and does not create barriers or increase the burden for local implementation of other nutrient reduction efforts.

We were pleased that the Guiding Principles for the Conowingo WIP include transparency, sound science, accountability, and equity — principles that should guide all WIP development. The Bay Program has estimated that it will require an annual reduction of 6 million pounds of nitrogen and 260,000 pounds of phosphorus to offset the impact of the Conowingo Dam's lost trapping capacity. Application of these principles will help ensure that the resulting load reductions for the Conowingo WIP are allocated equitably. Local governments will be affected by decisions made to address these loads, including where and when practices to address the loadings will be implemented. Therefore, echoing points that the Local Government Advisory Committee (LGAC) has previously made, we are asking that specific times be clearly defined in the Conowingo WIP process for local engagement and public comment before decisions are finalized.

We value the strong and collaborative relationship that the Bay Program and COG have cultivated over the years. Metropolitan Washington local governments look forward to providing feedback during the Conowingo Dam WIP development and implementation.

Sincerely,

A handwritten signature in blue ink that reads "Libby Garvey".

Libby Garvey
Chair Chesapeake Bay and Water Resources Policy Committee

Cc: Greg Barranco, U.S. Environmental Protection Agency
Bruce Williams, Chair, Local Government Advisory Committee to the Executive Council

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