



# Comments on Revised Draft Chesapeake Bay Agreement

CBPC

September 20, 2013

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# Draft Bay Agreement Timeline

- Abridged draft Bay Agreement was briefly open for stakeholder comment between July 10 and August 15, 2013.
- COG submitted comments on July 30<sup>th</sup>. CBP received 23 comment letters.
- CBP revised the draft Agreement based upon the comments received, and will have another comment period this fall.

# COG's initial comments

- Need for **adequate time** for comment (echoed by many others).
- Need for more **recognition of local governments' integral role** as “implementer of restoration measures” and the need for shared responsibility and equitable allocation of costs across levels of government.
- **Retain voluntary nature of the Agreement.** Do not include the Chesapeake Bay TMDL's 2017 and 2025 deadlines for implementation.
- **Adaptive management** should be a key principle.

# COG's 2<sup>nd</sup> Round of Comments

- Exact comments will depend on the next draft.
- Timing of comment period is still to be determined by the Bay Partnership, but presumably in time for December Executive Council meeting.
- COG will issue a draft letter for CBPC review via email, if comments are due before our November 15th meeting.

# Illustrative Comments From Stakeholder Letters to CBP

## Be more explicit:

- Bay TMDL and water quality standards ought to be explicitly integrated into new Bay Agreement .
- Accountability for signatories' management strategies. (ex., Chose Clean Water Coalition, CBF)

## Allow more flexibility:

- Adaptive management (ex., VIMS, COG, CBF)
- Timing related goals should be non-binding (ex., VAMSA/MAMWA, COG)
- “engage, empower, and facilitate leadership at the local level.” (ex., LGAC, City of Lancaster, COG)

## WRTC Comments (September 6 meeting)

- States should be copied on our next letter.
- Re: 2017 & 20125, good to have time goals to strive towards, but they shouldn't be binding targets.
- Why not make the Bay Agreement more forward looking? Ideally, the new Bay Agreement should start after 2017 and go beyond 2025.
- Monitoring is a good goal, but meanwhile the CBP is being faced with reducing monitoring stations.

## Suggested areas of focus for COG comments

- Focus new agreement on post-2017 reevaluation/beyond 2025 – to be forward looking & reflect adaptive management principles.
  - Do not incorporate 2017/2025 deadlines into this voluntary agreement – could create conflicts & constrain regulatory flexibility to extend deadlines
  - Do not make time targets binding
- Strengthen local government goal to include flexibility & adaptive management as active principles necessary to best address evolving nature of water quality issues.
- Emphasize the need for continued financial assistance for local governments from state and federal governments.
- Provide support for monitoring program, calling attention to current funding shortfalls.

# Suggested areas of focus for COG comments

- Issues/goals to watch
  - Land conservation goal
  - Toxics
- Fish Passages Recommendations:
  - Remove/modify blockages located at the furthest downstream (for migratory/anadromous fish)
  - Develop an inventory of high priority blockages, & then target additional stream miles



# Comments and questions

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## Chose Clean Water Coalition Members

- American Rivers
- Anacostia Watershed Society
- Audubon Maryland-DC
- Audubon Naturalist Society
- Blue Ridge Watershed Coalition
- Blue Water Baltimore
- Chesapeake Bay Foundation
- Chesapeake Wildlife Heritage
- Chester River Association
- Citizens for Pennsylvania's Future
- Clean Water Action
- Conservation Pennsylvania
- Delaware Nature Society 4
- Earth Forum of Howard County
- Eastern Pennsylvania Coalition for Abandoned Mine Reclamation
- Friends of Dyke Marsh
- Friends of Frederick County
- Friends of Lower Beaverdam Creek
- Izaak Walton League of America
- James River Association
- Lower Susquehanna Riverkeeper
- Lynnhaven River NOW
- Maryland Conservation Council
- Maryland League of Conservation Voters
- Maryland Sierra Club
- Mid-Atlantic Council of Trout Unlimited
- Midshore Riverkeeper Conservancy
- National Aquarium
- National Parks Conservation Association
- National Wildlife Federation Mid-Atlantic Office
- Natural Resources Defense Council
- Nature Abounds
- Parks & People Foundation
- Pennsylvania Council of Churches
- Peach Bottom Concerned Citizens Group
- Piedmont Environmental Council
- Potomac Conservancy
- Potomac Riverkeeper
- Prince William Conservation Alliance
- Rivanna Conservation Society
- Rock Creek Conservancy
- Savage River Watershed Association
- Shenandoah Riverkeeper
- Shenandoah Valley Network
- Sierra Club – Pennsylvania Chapter
- Sierra Club – Virginia Chapter
- Southern Environmental Law Center
- Talbot Preservation Alliance
- Virginia Conservation Network
- Virginia League of Conservation Voters
- West/Rhode Riverkeeper
- West Virginia Rivers Coalition

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