

March 15, 2014

[Via e-mail to agreement@chesapeakebay.net](mailto:Via_e-mail_to_agreement@chesapeakebay.net)

Mr. Nicholas DiPasquale
Chair, Chesapeake Bay Program Management Board
410 Severn Avenue, Suite 109
Annapolis, MD 21403



Dear Mr. DiPasquale and Management Board Members:

The Cecil Land Use Association, a county-level non-profit which seeks ways to protect the environment and responsibly manage growth, would like to express our support for the letter sent to you on March 13th by the Choose Clean Water Coalition.

While there are a lot of elements that we like, the draft Chesapeake Bay Agreement dated January 29, 2014 falls short in several areas and requires significant revisions if it is to achieve its purpose and lead us to the clean and healthy waters that we have all envisioned. We cannot support it in its current form.

We are particularly concerned about:

- The lack of accountability of the individual signatories, each of which can exercise its discretion whether to develop and implement the management strategies required to achieve the goals and outcomes. (Page 5, para 3).

As a county located on the northeast corner of Maryland, with the Susquehanna River and several significant creeks originating in Pennsylvania and Delaware, we are very concerned not just that our State lives up to the spirit of the agreement but that our neighbors and the other signatories do so as well.

- The removal of the Goals and Outcomes related to Toxic Pollutants, which were included in the 2000 Agreement and also in the September 2013 draft.

Given the occurrence of intersex fish in the Susquehanna that have been documented by the PA Fish and Boat Commission and reported on your website (Nov. 17, 2010), as well as the growing concern about emerging contaminants, it seems unconscionable not to address toxics in the new Agreement.

Aside from the adverse impact of toxic chemicals on the living resources in the Bay and our waterways, our local Comprehensive Plan anticipates our need to withdraw water from the Susquehanna to supply our expected population growth, (Section 6.4.4, p. 6-11) we also have a concern about our terrestrial living resources!

In addition to the points made so well in the CCW letter, we have some additional concerns regarding Land Use and Climate Change that are very well articulated in a letter to you from Wetlands Watch dated March 11, 2014. Quoting directly from that letter:

"This proposed draft agreement is largely silent on the impacts of development on habitat and other restoration goals. It is silent on the need for sound land use practices. These omissions reverse decades of clear policy statements on this issue in previous Chesapeake Bay Program agreements and studies."

In the future, the greatest threat to wetlands and habitat will be climate change. Sea level rise will impact tidal habitats as temperature and rain/drought cycles will impact non-tidal wetlands systems. Beyond wetlands many of the draft agreement's other habitat goals will be compromised by climate change.

.... the draft agreement is silent on climate change impacts and their relation to the Chesapeake Bay restoration.

This draft agreement relegates land use and climate change impacts to one sentence stating the need to, "Anticipate changing conditions, including long-term trends in sea level rise, temperature, precipitation, land use, and other variables." This single sentence represents a rhetorical parking lot where this agreement abandons some of the most significant challenges facing the Bay's restoration, admittedly some of the most politically controversial issues. It is the sole mention of these issues in a document that is designed to guide and inspire our restoration efforts in the coming decades."

As the county in Maryland which is forecast to have the highest growth rate over the next two decades, and in which our Designated Growth Area is also an area of wetlands and forest, and has three watersheds with Tier II waters, we have a lot to lose. We would like to see strong statements about Land Use and Climate Change included in the Agreement.

Thank you for the opportunity to comment,

Sincerely,

Jill E. Burke,

President, Cecil Land Use Association