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Mr. Nick DiPasquale
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Mr. DiPasquale, Thank you for the opportunity to provide comments on the proposed 2014 Chesapeake Bay Agreement. Many organizations have submitted substantive letters which address the issues of concern to Midshore Riverkeeper Conservancy. In particular, the letters submitted by Chesapeake Bay Foundation and Stewards of the Lower Susquehanna provide detailed comments that we agree with 100%. Generally speaking, an agreement of this nature should provide a framework for moving forward over the next 11 years as the Bay cleanup progresses over time. As stated by CBF, this Agreement should be broad in scope, aggressive in action and effective in outcome.

As pointed out by Michael Helfrich, the Goals and Outcomes section should reaffirm the commitment from the signatories, and participation should not be discretionary. EPA is required to oversee the cleanup of the Chesapeake Bay through enforcement of the Chesapeake Bay TMDL and the Bay States are required to participate in the cleanup. EPA offers funding for participatory states to help them meet their goals, and this agreement should reinforce the plan that is moving forward. Occasionally, it is necessary to show partners the stick in order to persuade them to take the carrot.

Local governments, in particular, seem paralyzed by the high cost of WIP implementation, particularly septic upgrades in rural counties. EPA could help to reverse this trend by making them aware of the consequences of failing to meet their obligations, but also could provide technical assistance and outreach to local governments to move them in the right direction. There is a strong need, for example, for research utilizing woodchips under the drain field of septic systems and switch grass planted over it. These low-tech changes have the potential to exceed the reduction realized by what is now considered "best available technology" for significantly less money.

Lastly, we are deeply concerned that there is no mention of toxics or of climate change in the agreement. The issue of toxics should permeate the Bay Cleanup effort. From fish consumption advisories, to endocrine disruptors, to atrazine in drinking water, this issue is of deep concern to me as a father and as a Riverkeeper. Whatever you want to call climate change, sea level rise and the frequency and intensity of storms is causing dramatic changes in our weather and rainfall patterns and our water quality. I'm not sure how the Bay Agreement should address these issues, but they are of critical importance.

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