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March 4, 2016

Mr. Nicholas DiPasquale
Chair, Chesapeake Bay Program Management Board
U.S. Environmental Protection Agency
Chesapeake Bay Program Office
410 Severn Avenue
Annapolis, MD 21403

Dear Mr. DiPasquale,

On behalf of the Chesapeake Bay Foundation (CBF), our Board of Trustees, and more than 200,000 members and supporters, we offer our support of and comments on the Chesapeake Bay Program's (CBP) Management Strategies and Work Plans.

The Education Work Plans under the Engaged Communities goal represent important opportunities to restore and eventually maintain the health of the Bay system. Unfortunately, many of the individual state Education Work Plans do not comprehensively address the goals. This may stem from the approach of only listing those actions which are already being undertaken, and thus already have resources committed. In order to achieve increased citizen engagement and pollution reduction, new actions and more actions will need to be commenced. It is hard to tell if the collective outcome of the draft work plan will get us measurably get us closer to a stable system that we are today. This may be in large part due to the fact that the goals are stated in language that does not provide clear objectives (e.g. "continually increase") and that the two year and long term targets have not been identified. Strong two year and long term targets should be established that will ultimately lead to accomplishing the goals.

CBF applauds the inclusion of an Environmental Literacy goal in the management strategies and the ongoing work of CBP to build partnerships dedicated to fostering an environmental literate citizenry.

We appreciate the efforts that went into developing these strategies and hope our comments can also inform the development of the work plans. Below please find specific suggestions on the draft work plans.



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Student Outcome

Management Approach 1. CBF recommends that all states should identify particular subjects/courses where students will receive MWEEs or require LEA's to identify those courses and report them to the state departments of education. If LEAs need further assistance in planning, training or implementation in order to carry this out, that could be identified instead.

We also recommend that all states should provide requirements/incentives for selected in-service teachers to participate in professional development.

Management Approach 1&2. CBP should produce guidelines of what constitutes effective/comprehensive teacher professional learning in delivering MWEEs.

Management Approach 2. CBF will provide administrator training in VA, DC, possibly PA (not just MD) and could consult with partners in WV, DE, and NY.

Management Approach 3. All states should identify an environmental literacy point of contact from each LEA.

Management Approach 5. All State Departments of Education should identify/assign a full time environmental literacy coordinator to liaison with LEA's and natural resource agencies and other stakeholders.

CBF can assist any state with the integration of MWEEs with NGSS through the provision of models and guidance documents.

PDE should convene a broad stakeholder group, including LEAs, IHEs, non-profit stakeholders, and DCNR, to create a statewide plan to address these issues.

Environmental Literacy Planning Outcome

Management Approach 1. All State Departments of Education should identify/assign a full time environmental literacy coordinator to liaison with LEA's and natural resource agencies and other stakeholders.

CBP should disseminate successful environmental literacy integration models regionally.

State Departments of Education should regularly require that all district submit and environmental literacy plan/report.



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All states should publish basic guidelines and models for school system (LEA) level environmental literacy plans.

Management Approach 5. CBP should disseminate models for utilizing Federal Education funds to support EE (MSP/ESSA well rounded).

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Sustainable Schools Outcome

Management Approach 1. All State Departments of Education should issue an annual report of sustainable schools by district.

All State Superintendents should generate a meaningful public recognition of all schools that achieve sustainable schools status on an annual basis.

Management Approach 3. All states should build networks of community partners in each state to support the achievement of sustainable school status (similar to MAEOE Green Centers in MD).

States should build a strategy/capacity to engage PTAs and school building level administrators in each state.

The Chesapeake Bay Foundation looks forward to working with our federal, state, and local partners to ensure that all students have opportunities to participate in meaningful watershed educational experiences, to support all school districts in developing robust environmental literacy plans, and to assist all schools in becoming sustainable throughout the Watershed.

Sincerely,

Tom Ackerman
Vice President for Education

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cc: agreement@chesapeakebay.net

