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April 30, 2015

Nicholas DiPasquale, Chair  
Chesapeake Bay Program Management Board  
U. S. Environmental Protection Agency  
410 Severn Avenue  
Suite 112 Annapolis, Maryland 21403  
[Agreement@chesapeakebay.net](mailto:Agreement@chesapeakebay.net)

Dear Mr. DiPasquale:

I am writing on behalf of the Local Government Advisory Committee to provide comments on the draft Management Strategies which were released for Public Input in March 2015. We appreciate the time and effort so many people have put into the development of these plans for achieving the Outcomes identified in the 2014 Chesapeake Bay Watershed Agreement. We hope that our feedback is helpful as the workgroups continue to refine and perfect the strategies.

The Preamble to the Watershed Agreement “acknowledges that the Partnership cannot address every issue at once and that progress must be made in a strategic manner, focusing on efforts that will achieve the most cost-effective results.” It also states that “one of the most important lessons the partners have learned from the past three decades is that although watershed-wide partnerships can help to coordinate and catalyze progress, implementation happens locally.” It is with these two statements in mind that we offer the following general comments:

1. If local government participation is needed to achieve an Outcome, Management Strategies must (a) make it clear that local participation is needed, (b) clearly describe local governments’ role in achieving the Outcome, and (c) explain how local governments can get the tools and resources they need to assist with implementation. While many of the Management Strategies strive to do this, more work is needed to clearly address local governments’ role.
2. When possible and when local governments have a defined role in achieving the Outcome, Management Strategies should include information about the COST AND BENEFITS to local government. Without this information, local governments may be reluctant to become engaged because of the concern it will cost more in time and money to implement than are available.



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3. Local governments need a better understanding of the Chesapeake Bay Watershed Agreement, including distinction between voluntary and mandatory components. Some local governments have expressed concern that this effort may lead to greater regulatory control. A Partnership-endorsed and supported strategy for communicating with local governments is critical.
4. To help those outside the Chesapeake Bay Program better understand the organizational infrastructure, all Management Strategies should identify Team Lead, Workgroup Lead, and Opportunities for Cross-Goal Team Collaboration as presented in the Wetland Management Strategy under Participating Partners.

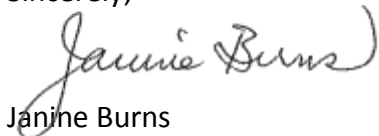
Additional comments related to the following specific Management Strategies are attached:

- Local Leadership
- Land Use Methods and Metrics
- Land Use Options Evaluation
- Wetlands
- Healthy Watersheds
- Urban Tree Canopy
- Water Quality
- Toxics Contaminants Policy and Prevention
- Submerged Aquatic Vegetation

LGAC members regret that we were unable to review the remaining Management Strategies. We believe that all the Outcomes are vital to achieving our collective Vision of a healthy and vibrant Chesapeake Bay watershed.

Should you have questions about comments provided, please contact Mary Gattis, LGAC Coordinator at 717-475-8390. She will continue to represent LGAC in workgroup and Goal Implementation Team meetings as time allows.

Sincerely,



Janine Burns  
Chair, Local Government Advisory Committee

Copy: Members, Local Government Advisory Committee  
File



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Local Government Advisory Committee  
Comments on Draft Management Strategies  
April 30, 2015

**Local Leadership**

General Comments

1. The Management Strategy should be edited to minimize redundancy and increase readability. LGAC will be submitting suggested edits, in the form of a revised document with changes tracked, directly to the Local Leadership Workgroup.
2. The term “capacity” should be defined the first time it is used and then throughout as necessary. If capacity is understood to include funding, consider adding a Management Approach that addresses local governments need for increased funding.

I Goal, Outcome and Baseline

1. Include the following language in the second paragraph after the Outcome:  
The development of this baseline will involve multiple factors, including the knowledge and capacity among local leaders. Measuring knowledge and capacity of local officials is problematic. This might be accomplished by a self-evaluation survey provided to local officials. Given turnover rates among local officials in some jurisdictions, results would reflect only a moment in time. Public opinion polls may be more useful. Other factors, such as effective programs, policies, models and management actions, will be helpful in building a baseline and determining metrics for this Goal.

II Participating Partners

1. The Local Government Advisory Committee should be listed under Other Key Participants.
2. Suggest replacing the existing text under Local Engagement with the following text:

Success of the Local Leadership Outcome relies on building knowledge and capacity of local leaders. During the last decade, federal and state regulations were significant in guiding Chesapeake Bay program efforts. Increasingly, continued progress in the watershed will depend on voluntary, informed actions by local officials, watershed association, non-government organizations (NGOs), grassroots leaders and individual citizen stewards. Working together to identify specific, critical roles for local leaders in a culture of mutual respect, and ensuring local knowledge and capacity are sufficient will become increasingly important.

III Factors Influencing

1. The text and bulleted lists are somewhat redundant. Consider revising into one concise statement or list.

IV Current Efforts and Gaps

1. The first item in the bulleted list says “Bay funded...” Should this read “Chesapeake Bay Program funded...”? This item doesn’t appear to belong in this list since it is not a current effort related to achieving the Outcome specifically but rather a research project intended to inform a management approach. Suggest removing it from the list and describing in a brief paragraph in order to clarify what the project is and what it seeks to accomplish.
2. In the section titled “Cross Collaboration among Management Strategies” there should be a reference to other management strategies that specifically call out the need for increased knowledge at the local government level.



The following suggested edits to the third paragraph may achieve this:

Likewise, the achievement of the Local Leadership Outcome affects the success of many other goals and outcomes because many depend on local implementation of actions. The following management strategies specifically identify a need for increased knowledge and capacity among local governments: (solicit list from GITs/workgroups)

A strong culture of excellence in natural resource management among local officials can provide the framework for action necessary to achieve the vision articulated in the Chesapeake Bay Watershed Agreement.

## V Management Approaches

1. Management Approaches should be numbered to make the document more readable.
2. Suggest revising the third Management Approach, Improve “knowledge management”, to read as follows:
 

Volumes of information are available on the internet and through various jurisdictions, associations and organizations. While information is plentiful, local officials repeatedly expressed concern that specific information is not readily accessible nor in an easy-to-interpret form. Time is a scarce resource. Some local leaders envision a tool that would provide one-stop, quick access to successful models and processes by topic. A portal that extracts successful models and processes from existing organization and association data bases could prove catalytic in engaging local communities in Bay-related initiatives. Steps to investigate the feasibility of various tools, such as a cloud-based portal, may include:

  - Convene a diverse group of multi-jurisdiction leaders with limited resources (staff, time and money) who want to support Bay restoration efforts.
  - Learn their priorities for models and best practices by topic.
  - Reach out to NGOs and other partners to identify sources for outstanding models and practices in the topic categories.
  - Brainstorm options for better delivering quick access to successful models and processes.
  - Evaluate whether proceeding to the next phase would add value toward achieving Chesapeake Bay partners’ goals.

Improving knowledge management includes ensuring effective communication with local leaders and their communities. Steps to enhance communication may include:

- Identify existing communication methods and outreach mechanisms used by states, federal agencies and NGOs to reach local officials.
- Determine options to enhance and improve these approaches.
- Establish best practices for working with less engaged municipalities and local audiences.
- Review approaches for effectiveness periodically.
- Identify ways to continually improve these approaches based upon needs of local officials.

Examples of options to explore include increasing regional collaboration regionally; providing funding for municipal and regional visioning sessions; identifying companies and organizations to assist with knowledge transfer; identifying other techniques to address knowledge gaps; establishing better establish teaching/training relationships with universities and community colleges.



3. Suggest revising title and content of the fourth Management Approach, Identify and improve key information sources, to read as follows:

Identify information needed to improve communication with localities

Local officials' information needs differ from those of the general public or the scientific community. Development of key information sources will be created as part of this approach. While messages for local officials and the general public may be similar, content tone and presentation should be distinct.

Local officials want to know what is proposed or required, resources provided, deadlines, responsibilities, and how actions will support local priorities. Effective public communication is clear, brief and contextual; addresses obstacles perceived by local leaders; and builds community support. With both types of communication, continually building a broad-based culture of excellence surrounding Chesapeake Bay restoration will be vital. Steps to improve communication include:

- Identify and prioritize types of information and information sources beneficial to local officials from their perspectives, such as flooding resiliency, community benefits from stormwater management, and cost-benefits of green canopy.
- Deliver the information in a manner that is collegial, clear and relevant.
- Continuously evaluate communications from the perspective of the message intended versus the message as it was received
- Refine messaging so it communicates content while it builds respectful relationships

Examples of options to explore include targeted new releases and case studies providing economic justification for investments.

4. "Approaches Targeted to Local Participation" could be strengthened by including the following text:

To facilitate greater local participation from underserved and underrepresented communities, the CBP Local Leadership Workgroup will work closely with the Diversity Action Team to identify non-traditional partners and conduits for achieving the Outcome.

Additional actions, tools or technical support needed to empower local governments to participate in achieving the Outcome will be identified in the Work plan.

5. Under the heading Cross-Outcome Collaboration and Multiple Benefits it reads "The following management strategies identify the need to increase local officials' knowledge as being necessary to achieve the Outcome" but there is no list following. A list of Outcomes that call for increasing local officials' knowledge should be included in this management strategy if possible. If that isn't possible then this sentence should be removed. See comment number #2 under Current Efforts and Gaps also.

## VI Monitoring Progress

1. Delete last bullet which calls for an estimate number of education programs, online resources, etc.



## Land Use Methods and Metrics\*

\*Headers in document should read *Land Use Methods and Metrics Outcome*, not *Metrics and Measures*.

### Introduction

1. Impervious surface could decrease in highly urbanized areas where newer land use controls (e.g. landscaping requirements, etc.) are in place. This potential for an increase in impervious should be considered when developing the metric and method and analysis.
2. Last paragraph – intent should also be to better understand the impact of conversion.

### I Goal Outcome and Baseline

1. Baseline and Current Condition – suggest including a statement reflecting the evolution of land use controls being adopted to manage growth. This was, in many cases, a response to the economic boom.

Sample language for consideration: It should also be noted that some local governments in the watershed have adopted smart growth policies that may be reflected in land use regulations, which may also have an impact on conversion analysis. Therefore, baseline assessments initiated post 2006 may more accurately reflect current rates of change.

### II Participating Partners

1. Local Engagement – suggest the following language be inserted at the beginning of this section:

Local government stakeholders are needed to advise the Chesapeake Bay Program on the development of the methodology and local level metrics, and in quantifying potential impacts.

### IV Current Efforts and Gaps

1. Are there any current efforts related to quantifying impacts to communities or the environment that can be referenced here? Following are some examples. Additional resources are listed on the US EPA website under Smart Growth.
  - a. [The Transportation and Environmental Impacts of Infill versus Greenfield Development: A Comparative Case Study Analysis](#)
  - b. [Our Built and Natural Environments: A Technical Review of the Interactions Between Land Use, Transportation, and Environmental Quality \(2nd Edition\)](#)
  - c. [Protecting Water Resources with Higher-Density Development](#)

### V Management Approaches

1. Is an additional element is needed since the Outcome specifically calls for “measuring the extent and rate of change in impervious surface coverage ...” There could be conversion from impervious to pervious, specifically in highly urbanized areas.
2. The section on Approaches Targeted to Local Participation states that LGAC and others will work with the CBP Land Use Workgroup and Communications Office to develop a communication strategy and to identify the specific measures used to assess impacts to communities. This approach is appropriate for communicating results. However, a different approach to engaging local government stakeholders who can advise the Program on issues related to developing the watershed-wide methodology and local level metrics should be considered.





## Land Use Options Evaluation

### General Comments

1. Correct title on document header. Should read Land Use Options Evaluation, not Land Use Options and Evaluation.
2. The term “smart growth” should be defined.

### Introduction

1. In the last full sentence on the first page it reads “The population of the watershed is expected to grow by 2 million people ... by 2030.” Since everything else we’re doing is targeted to 2025 should the management strategy reference that date instead? If so, change throughout the document.

### II Participating Partners

1. Should LGAC be listed under Other Key Participants?
2. Under the heading Local Engagement – include the following sentence:  
The advice, guidance and direct assistance of LGAC will be needed throughout the process of implementing this management strategy.

### III Factors Influencing

1. Under Political and Educational Challenges – suggest the following sentence be included:

Local governments need better information regarding the benefits of conservation, particularly as it relates to achieving the pollution reduction targets in the CB TMDL.

### IV Current Efforts and Gaps

1. The section understates some efforts that have been made. For example, Virginia’s Chesapeake Bay Preservation Act (which has now been in effect for 25 years) requires certain provisions to be incorporated with land-use ordinances of “Tidewater” localities. Such requirements include vegetative buffers along perennial streams, stormwater management controls, five-year pump-out for traditional on-site wastewater treatment systems, and other protections.
2. This section should recognize many diverse factors that need to be considered in the regulation of land use, including affordability of housing and the adequacy of surrounding infrastructure. It is important to also recognize the local economic development objectives, especially in areas where there is high unemployment and other factors that concern local officials. It is important to stress the need for harmonizing (through the comprehensive planning process) economic development objectives with environmental objectives, and it is in this area where some localities may be in need of technical assistance. In the area of land use planning and regulation, questions relating to property rights also cannot be ignored.
3. Should there be a reference in this section to related studies/evaluations that have been done across the US by organizations such as US EPA Office of Smart Growth, American Planning Association, Smart Growth America and others? If so, perhaps a statement such as the following is warranted:

Despite the multitude of studies/evaluations that have been conducted, we continue to experience loss of natural lands ... Thus, the management approach presented below includes an evaluation of current efforts in order to determine what additional strategies are needed to achieve the Goal\*.

*\* Note to reviewer: The word Goal is intended here, not Outcome.*

- Page 6 of the “Land Use Options and Evaluations” section states “... the proposed Bay Program web page could be expanded beyond land use policy options, incentives and planning tools needed by local governments and other applicable interests groups to achieve other Chesapeake Watershed Agreement Outcomes.” “Local governments” should not be referred to as an “interest group. A local government is a vital partner in delivering essential public services. Perhaps this sentence can be reworded at follows: “The proposed Bay Program web page could be expanded beyond land use policy options, incentives and planning tools needed by local governments and other participating entities to achieve other Chesapeake Watershed Agreement Outcomes.”

#### V Management Approaches

- The word “Goal” should be changed to “Outcome” in the first sentence under Management Approaches.
- The second task refers to posting information on the Bay Program web page. The workgroup implementing the Local Leadership Management Strategy should also be consulted guidance regarding effective delivery of information to local officials. Creating another webpage may not be advisable. This comment should be reflected throughout the document.
- The third task in the bulleted list should include analysis and survey. Analysis will be provided by the Land Use Workgroup via the work being conducted on Land Use Metrics and Methods Outcome, correct? Suggest revising to read as follows:  
 Conduct analysis and survey local governments to determine ...
- Under the heading Cross-Outcome Collaboration and Multiple Benefits – Consider including a list of relevant Goal Implementation Teams and a statement about establishing a procedure for regularly communicating with them on items of mutual interest.

### Wetlands

#### Introduction

- The introduction is very informative and helps those reading understand why they should care about this Outcome. The reference to wetlands as a credited BMP is particularly important to local governments.

#### I Goal Outcome and Baseline

- Under Baseline and Current Condition heading - Would it be valuable to identify the number of acres in each jurisdiction? Restored versus enhanced?

#### II Participating Partners

- If there is a need to educate, inform or increase capacity of local officials’ to achieve this Outcome, the Partnering ... GIT (6) and Local Leadership Outcome should be added to the list under Opportunities for Cross-Goal Team Collaboration.
- This section does not address the local engagement. There should be a statement about whether there is a general or specific role for local governments, watershed associations, nonprofits the private sector or others in achieving the Outcome. Suggest adding the following statement under the heading Local Engagement:





NGOs play a critical role in achieving this Outcome. *Expand on this, providing a brief description of the role and level of participation of each entity (or referring back to list above) ...* As land owners, local governments have a specific role in achieving this Outcome as well. Local governments general role in achieving this Outcome relates to communicating benefits to private landowners and those who hold large tracts of land within their jurisdictions (farmers, land conservancies, etc.)

3. Will state agencies, such as Pennsylvania DCNR or departments of transportation, who implement wetlands restoration or enhancement on lands they own or control, be identified in the work plan if they aren't listed under Participating Partners?

#### IV Current Efforts and Gaps

1. Under the heading Actions, Tools and Support to Empower Local Governments and Others, consider adding the following text:

Add to beginning of this section: The following (tools) have proven useful in empower local governments and others to pursue wetlands restoration and enhancement projects. If not already underway, consideration should be given to expanding the use of these tools in other jurisdictions.

Add to end (if appropriate): Additional actions, tools and support needed to empower local government and others will be identified during development of the work plan.

#### V Management Approaches

1. Suggest removing the Local Engagement heading and bulleted text which appears immediately above Approaches Targeted to Local Participation on page 8.
2. Move text that appears under heading Approaches Targeted to Local Participation to Participating Partners section on page 3. See comment #2 under Participating Partners above for additional suggestions regarding text for that section.
3. Include the following revised text (which currently appears under the heading Local Engagement) under heading Approaches Targeted to Local Participation:

To facilitate greater local participation, including participation from underserved and underrepresented communities, the Habitat Goal Implementation Team, in partnership with the LGAC, CAC and the Diversity Action Team, will actively seek representatives from local governments, county conservation districts, watershed associations, and other nonprofit organizations to serve on the Wetland Workgroup. In addition, the Wetland Workgroup will track progress and seek continual feedback from local stakeholders. The Wetland Workgroup will provide annual reports to the Habitat GIT and stakeholders including local governments.

### Healthy Watersheds

#### I Goal Outcome and Baseline

1. What is the baseline year for this Outcome? That is, maintain 100% of healthy watersheds identified in 2010 or some other year?



## II Participating Partners

1. Under Local Engagement heading, consider revising the second paragraph, last sentence to read as follows:  
 “Local tools for healthy watershed protection include planning (comprehensive, park and recreation, transportation, economic development, water resources, etc.); official maps; land use regulations including sub-division and land development and zoning; land and easement purchases; post-construction stormwater management and mitigation requirements; and a variety of other tools.”
2. Move last paragraph under Local Engagement heading to the Management Approaches section, under Approaches Targeting Local Participation.

## III Factors Influencing

1. The text describes land use change and regulations (local, state, federal and regional) as critical factors influencing this Outcome but that idea could be easily overlooked if scanning the document. Suggest that each issue its own heading rather than describing under the heading of Human and Natural Factors.
2. The impact of natural gas extraction and conveyance (drilling and pipelines) on healthy watersheds should be included in the Factors Influencing.

## IV Current Efforts and Gaps

1. The Current Efforts information in this section is extensive and informative but it isn’t clear what is considered a Current Effort. In fact, many of the items listed appear to be better suited for the section titled “Factors Influencing.” It may just be a matter of reorganizing the presentation of material under each heading. For example, the text which appears under the heading “Identification and application of protective measures ...” doesn’t explain what is currently happening in terms of identification or application. It only says that additional protection measures may be required and what some of those measures are. This entire section needs to be edited and condensed in order to clearly convey what efforts are already being taken and whether those efforts are sufficient to achieve the goal.
2. Under the heading Collection of comprehensive healthy watershed status/or condition information – consider listing local governments’ lack of awareness and/or knowledge about watershed conditions as a gap. Even if there is information at the state level, it is not being effectively communicated to local governments.
3. The interactive tool that was developed as part of the West Virginia Watershed Assessment Pilot Project should be specifically identified as a tool for empowering local governments. Consider adding a section titled Actions, tools and technical support needed to Empower Local Government and Others in this section and include there or include under Approaches Targeted to Local Engagement at end of section on Management Approaches.
4. Should there be a reference to the Land Use Metrics and Methods Outcome in this section, possibly under the heading “Assessments of healthy watershed vulnerability on page 6, since that Outcome calls for the quantification of environmental impacts of land conversion?
5. Would it make more sense to include the reference information about Jurisdictions’ healthy waters and watersheds definitions under Current Efforts, possibly calling the definition of healthy watersheds out as a Current Effort? In this case, would the lack of definitions in DE and DC be identified as a Gap? Note that in the current draft, it says “definitions are provided here:” but then the entries for DE and DC both say “no healthy waters or watersheds identified.” This raises the question of whether they have a definition but none have been defined, or is there no definition of healthy waters/watersheds?

V Management Approaches

1. Clear concise and informative opening paragraph.
2. What is the Goal Team Partnership?
3. Under the heading Cross Outcome Collaboration and Multiple Benefits heading, replace Local Government Advisory Committee with Enhancing Partnering, Leadership and Management Goal Implementation Team, who is leading the Local Leadership Management strategy.
4. Include section on Approaches Targeted to Local Participation – this should describe the steps that will be taken to facilitate greater participation, including what actions, tools or technical support will be provided. This relates to Management Approach #2 but should describe more of the “how”. See comment #2 under Participating Partners above. References to working with LGAC, CAC and the Diversity Action Team may also be appropriate.
5. Identify Actions, tools and resources to empower local government and others, such as the interactive tool developed for the West Virginia project mentioned in Current Efforts.
6. Include mapping of designated source water protection/groundwater recharge areas as an Action, tool or resource needed to empower local governments and others.

**Urban Tree Canopy**

II Participating Partners

1. The information about the Tree Canopy Summit under the Local Engagement heading should be moved to Current Efforts. This information detracts from the main message of this section which should be 1) that local entities (government, watershed groups, etc.) have a vital and specific role in achieving this Outcome and 2) what that role is.
2. This section clearly states that “the urban tree Outcome will only be achieved through the efforts of local governments.” For 93 out of Virginia’s 95 counties, road maintenance is the responsibility of the Virginia Department of Transportation (VDOT’s), and subdivision streets are accepted into the Virginia’s secondary system when they meet VDOT’s subdivision street standards. One issue worth investigating is the degree to which these standards encourage (or discourage) the establishment of a tree canopy in new developments.

IV Current Efforts and Gaps

1. Can a list of Actions, tools and technical support needed to empower local government and others be derived from the Gaps? If so, include at the end of this section under the heading Actions, Tools and Technical Support Needed to Support Local Government and Others.

V Management Approaches

1. Management approaches that involve increasing knowledge or capacity of local officials, e.g. #2 under Funding/Partnerships which calls for providing guidance/case studies/best practices for local governments, should be coordinated with the Local Leadership Management Strategy which addresses the need for a more effective means of delivering critical information.
2. This section should specifically address local engagement. Under the heading Approaches Targeted to Local Participation, suggest that the following information be included:  

To facilitate greater local participation, including participation from underserved and underrepresented communities, we will work with the Diversity Action Team as described under Cross-Outcome Collaboration above and solicit guidance from LGAC during work plan development
3. This section should include the actions, tools and technical support that will be provided (if known) or if not known include a statement about identifying during development of the work plan.



## Water Quality

The Water Quality Management Strategy identifies the delivery of necessary financial capacity to implement practices and programs as a Factor Influencing the ability to achieve the Outcome. It also lists sustaining the capacity of governments to implement practices but only refers to jurisdictions (aka states, the District and the Commonwealths) and the federal agencies as having “described their capacity (funding, authorities and sustainability).” There is no reference to local governments’ capacity or the need to sustain their capacity to cover the majority of costs despite the acknowledgement (see page 4) that “A substantial portion of the nitrogen, phosphorus and sediment controls necessary to meet the Bay TMDL allocations is expected to be implemented at the local level by CBP partners including conservation districts, local governments, planning commissions, utilities and watershed associations. “

## Toxics Contaminants Policy and Prevention

LGAC is concerned that many of the Management Approaches, including many that are identified as Approaches Targeted to Local Participation, will result in significant costs to local government. Any such potential costs to local government should be quantified during development of the Work Plan for this Management Strategy and sources of funding to support the implementation of these activities should be identified.

## SAV

The Management Strategy fails to address the question of whether local governments have a general or specific role in achieving the Outcome, despite the fact that Habitat Conditions and Human Impacts, both of which are influenced by local government action or inaction, are identified as Factors Influencing the achievement of this Outcome. Given that the Management Approaches focus on underwater grass planting, we assume there is not a direct role for local government. However, it appears that local governments do have a general role with respect to land use control and/or implementation of practices to meet pollutant reduction allocations set by the Chesapeake Bay TMDL. Furthermore, local governments could be engaged in planting by encouraging SAV planting as part of shoreline restoration projects.



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