CBP Structure Feedback from GITs and Workgroups

Background: Following the presentation and discussion of an initial CBP organizational structure strawman at the Management Board Fall Retreat and Oct 9 meeting, multiple Goal Implementation Team and Workgroup leadership expressed feedback on the structure strawman and shared priorities for the revised structure. This feedback is not considered comprehensive or representative of the thoughts of the entire workgroup or GIT membership. In addition, given the current lapse in appropriations, leadership from many GITs and workgroups are not available to give feedback. We have compiled available feedback that was shared with WQGIT Leadership to aid and inform our own discussion.

Materials: Initial CBP organizational structure strawman circulated for discussion by Management Board and Principals Staff Committee:

- Strawman Chesapeake Bay Program Structure | Sep 30, 2025
- Structure Strawman Proposal EPA Revised v3 | Oct 16, 2025
- Draft Proposal for a Streamlined Chesapeake Bay Program Structure | Oct 20, 2025

Agriculture Workgroup

Letter from AgWG Chair and Vice-Chair, Kathy Brasier and Caitlin Grady | October 10, 2025

We write as Chair and Vice-Chair of the AgWG to express our concerns about the proposed reorganization. The CBP Structure Strawman appears to dissolve the AgWG and partition its actions and areas of responsibility out to other groups, most likely the Reducing N/P/S Outcome Group. We would be happy to meet and discuss the strengths we bring in our current formulation and identify how changes to the reorganization might influence the work related to agricultural impacts on the Bay.

One of the most critical places in the CBP where consistent stakeholder engagement occurs is in the sectoral workgroups, such as the AgWG. In this forum, representatives of the CBWA signatories engage with experts in agriculture and water quality and the public to learn and deliberate together. In the AgWG, the delicate balance among often-competing interests across agricultural and environmental stakeholders are brought together. Our monthly calls get, on average, 50+ participants, engaged in the very difficult conversations related to how we seek to achieve water quality goals within the agricultural sector - the sector that is currently driving the majority of the impairment in the Bay. Given the magnitude of work left to be done in the agricultural sector to achieve water quality goals, a separate group is imperative.

Over the past year, the AgWG has been developing a working plan to guide our areas of discussion and decision-making. All 21 of our voting members have been involved in the development of this plan - as have the myriad interested parties who attend our meetings each month - through several hours of deliberation and discussion. One of the questions driving our prioritization process was how the AgWG is uniquely positioned to address each particular topic. The high-priority areas identified reflect the continuing importance of our focus on agriculture-specific activities, practices, implementation, programs, and verification. This opportunity to learn together, deliberate, share perspectives, and make joint decisions is critical to moving forward with incremental goals related to water quality.

Dissolving the AgWG, and partitioning out the work of this group to other bodies diminishes the importance of agriculture to the Bay's water quality concerns and directs attention, resources, and opportunities away from the sector with the most consistent and persistent source of pollutants. In so doing, it takes away opportunities for this sector to be engaged in the conversation, identify potential pathways forward, and address the long-term challenges associated with agricultural production in the Bay that constrain farmers' capacity to enact stewardship. And given the institutional knowledge, the diverse network, strong relationships, and history of effective action built through the AgWG over the past decades, dissolving it would lead to greater inefficiency and decreased effectiveness.

If there are concerns about how the AgWG is structured or functions, we would be happy to meet with members of the WQGIT, MB, and/or PSC to discuss alterations to our current procedures and organization.

Urban Stormwater Workgroup

Response and Recommendations on Strawman Structure Proposal from USWG Chair, Norm Goulet | October 10, 2025

The proposed structure removes or obscures several foundational components of the Bay Program—the **source sector workgroups, the Modeling Workgroup, and at-large member participation**. Each of these elements is central to transparency, technical rigor, and trust within the partnership. Without them, the Program risks:

- Losing technical credibility, as critical expertise in stormwater, agriculture, and wastewater is sidelined.
- Eroding confidence in modeling results, if stakeholders are no longer engaged in model review and interpretation.
- Weakening implementation, by disconnecting state-level policy from the realities faced by local governments and local practitioners.

1) Source Sector Workgroups

The source sector workgroups serve an essential role in advancing the goals and priorities of the Chesapeake Bay Program Partnership. These workgroups interface directly with local partners implementing practices and programs and represent the expertise and experience that enhance Program decision-making. The **Urban, Agriculture, and Wastewater Workgroups** are the technical and practical bridge between policy and implementation. They ensure that nutrient and sediment reductions are grounded in feasible, sector-specific strategies. Without them:

- The Program loses the primary venue for BMP development, verification, and innovation.
- Data and model inputs risk becoming inconsistent or unvetted.
- Local expertise and real-world perspectives will be absent from decision-making.

To highlight some specifics, below are Urban Stormwater Workgroup (USWG) examples.

USWG Empowers Local Governments

- The USWG Governance establishes up to two voting members per state for local government representatives. This depth of engagement with local implementers strengthens programs and ensures policies and programs address local needs and respect local constraints
- Establishes cross-outcome connections within the Partnership by directly addressing implementation support needs associated with local priorities including toxic contaminants, flood resilience, and tree canopy expansion. Provides a venue to discuss these local priorities that ultimately benefit multiple outcomes by connecting investments in these efforts to water quality goals.
- Shares case-studies and best practices for more effective programs and implementation. Recent examples include new BMP design approaches, effective asset management database systems, successful updates to stormwater manuals, and award-winning education and outreach programs.

Stormwater Innovation

- Since 2017, the USWG has opened the door to new technologies including Continuous Monitoring and Adaptive Control (Smart BMPs), Coagulant-Enhanced Stormwater Treatment Ponds, Biochar Amendments, and more. They have also evaluated new approaches to older practices including infiltration media amendments, impervious cover removal, and conservation landscaping.
- Ensure existing BMPs are updated to reflect the latest science and policy. As Expert Panel Reports age, state laws and programs change, and the Modeling tools are updated, there is a need to ensure older BMPs are still reasonable and reflect the best available science and on-the-ground conditions. Urban Nutrient Management, Street

Sweeping, and Stream Restoration have all required substantial updates led by the source-sector workgroups.
- Leads innovative initiatives like the development of the Bay-Wide Projected IDF curves, Vulnerability Assessment Framework, and BMP Adaptation Design Guidelines.
- Evaluates approaches to streamline tracking and reporting of BMPs to improve program efficiency and reduce administrative burdens through projects like the "Beyond Bean Counting" Project.

USWG Model Development Support

- Development and review of critical data inputs including land use classifications, land use loading rates, MS4 layers, non-farm fertilizer application methodology, E3 scenarios, sediment delivery assumptions, and nutrient dynamics in urban pervious lands
- Development of technical appendices for all new stormwater Expert Panels and responding to any technical requests from the CAST team to update tools and resources.
- Facilitating state and local partner review of Model updates and assisting understanding of the implications of any changes at the local level.

2) Modeling Workgroup

The Modeling Subcommittee provides transparency and accountability for the Bay's suite of models. It ensures the partnership understands how targets are derived and what assumptions underpin progress reporting. Without this group:

- Model development becomes opaque, leading to less clarity on model inputs, assumptions, and an increased reliance on documented changes.
- The adaptive management c

3) At-Large Membership

At-Large Members are independent, non-jurisdictional members who ensure a diversity of perspectives across Goal Implementation Teams and Workgroups. Their participation grounds decisions in the real-world challenges of implementation and builds trust. Without them:

- Decision-making becomes dominated by state or federal interests.
- Local government experience, innovation, and cross-sector coordination are lost.
- Trusted sources that translate science and policy into implementable local actions will be lost.

Moving Forward

We recommend that any future Bay Program structure:

1. Retains source sector workgroups as standing entities under the Clean Water track.
2. Maintains the Modeling Subcommittee as an independent, transparent technical body.
3. Guarantees at least three at-large members per GIT and Workgroup, with designated local government representation.
4. Aligns governance under two coordinated but distinct tracks to ensure both compliance and restoration objectives are met effectively. Consider the following:
    - *Track A (Regulatory)* – driven by EPA and Clean Water Act requirements.
    - *Track B (Voluntary)* – driven by partnerships, communities, and restoration goals.
    - *Shared Engine* – PSC, STAR, Advisory Committees, and cross-cutting workgroups.

USWG Support Notes | October 10, 2025

USWG Chairs and Coordinator compiled an overview of activities, accomplishments, and partnership support performed by the USWG from 2017 – 2025. The list is posted here for reference.

Habitat Goal Implementation Team

Governance and Structure Feedback from HGIT Chair, Gina Hunt | October 23, 2025

We appreciate the discussion with the other GIT chairs/coordinators and staffers this week on some of the proposed governance and structure ideas. With the limited time available, the workgroup chairs were not polled on the ideas. The feedback represents the consideration of the Goal team chair.

1. Management Strategies (proposal: one management strategy for each Goal)

The Habitat GIT strongly disagrees with the proposal to have only one management strategy under a Goal. Even if the Habitat GIT does not merge with the Sustainable Fisheries GIT there are too many very different outcomes under this goal. One management strategy would either be exceedingly long and no one will read it, or so short that it loses all detail and purpose.

2. Cross-GIT Coordination (proposal: combination of Habitat & Fish GITs)

a. To merge the Fish and Habitat goal language in the agreement is appropriate as it improves understanding and readability. However, to merge both goal teams structurally will not improve function as the outcomes are very distinct and often separated by tidal interests. The Goal team would consist of 9 workgroups that do not have overlapping membership. Combining teams makes sense when the membership is largely the same on two teams. This is not at all the case with theses Goal teams. The result will be separate meetings

again to get back to a structure participants feel relate to their interest, or to have combined meetings where people do not attend due to lack of relevance. Neither is the desired effect.

b. The interim Governance, Structure and Accountability document created for the PSC (CBP-Streamlined-Structure-Proposal_2025.10.20.pdf) specifies that there would be regular meetings for Program Implementation. These meetings will foster the cross-GIT collaboration that merging goal teams would not achieve. The Habitat GIT fully supports this addition.

In contrast, The EPA Structure Strawman Proposal EPA Revised v3, 10.16.25 defines the Implementation Workgroups as only signatories. There is no opportunity for Goal or outcome collaboration, and this team structure is completely redundant with the PSC. This proposal also removes the Goal teams. If the Implementation Workgroup signatories are responsible for overseeing the Outcome Workgroups, they will have significantly increased workloads and be required to attend many more meetings than ever to achieve the goals.

3. **Workgroup/Action Team (proposal: limits to workgroup/action team development, membership numbers, and decision-making)**

a. There should be a Workgroup for every Outcome unless membership is largely the same on two teams. The Goal teams should have the ability to decide if an action team is needed to implement their outcome or target.
b. There should not be a limit to workgroup members. At a time when jurisdiction and federal budgets and staff are strained and limited, it is imperative that we look to other partners for help with Outcome implementation. The Beyond 2025 report very clearly recommended greater public and partner participation. This is contrary to the agreed-upon report.
c. To decrease the number of partners that can participate in decision making would again weaken the partnership. Under the proposal, we have chairs of outcomes that would not be able to vote. This type of hierarchy within the teams may lead these voluntary participants to feel undervalued and unappreciated. Since the success of these teams depends on resources and partners beyond the jurisdictions, it sends the message that their contributions are welcomed, but their perspectives are not.
    i. In Goal team decisions, workgroup chairs should have a vote along with at large and jurisdiction members. Any voting member should be in good standing with meeting attendance. Folks that are not engaged or participating will not be well informed to vote.
    ii. In Workgroup decisions, the members in good standing with attendance should be able to vote. Membership is not limited to the jurisdictions. Interested parties would not vote.