



Chesapeake Bay Program
Science. Restoration. Partnership.

Public Input on Draft Management Strategies

Public Comments on Draft Management Strategies

Total all Management Strategies 333

Sustainable Fisheries 31

Vital Habitats 67

Water Quality 16

Toxic Contaminants 17

Healthy Watersheds 7

Stewardship 37

Land Conservation 18

Public Access 8

Environmental Literacy 6

Climate Resiliency 108

Miscellaneous 18

Public Comments on Draft Management Strategies

30 distinct letters/sets of comments from organizations

Private Citizens and Citizen Organizations

99 letters Citizen Advocates (Sierra Club)
CBP Citizens Advisory Committee
Letter from 4 named citizen advocates
Letter from 2 students, U of MD, School Of Public Health

Utilities/Municipal Services

Hampton Roads Sanitation District (HRSD),
Maryland Association of Municipal Wastewater Agencies
Virginia Association of Municipal Wastewater Agencies, Inc.

Industry

Maryland Blue Crab Design Team (Fishing Industry)
Maryland Oysterman's Association
Maryland Waterman's Association

State/Local Government

CBP Local Government Advisory Committee
Carroll County Board of Commissioners
Carroll County Dept. of Land Use, Planning & Develop.
Clean Chesapeake Coalition
Maryland Department of Natural Resources
Maryland State Water Quality Advisory Committee
Metropolitan Washington Council of Governments
Montgomery County Department of Environment

Public Comments on Draft Management Strategies

Environmental/Advocacy/Conservation/NGOs

Chesapeake Bay Foundation

Choose Clean Water Coalition

Maryland Sierra Club

National Parks Conservation Association (NPCA)

Pennsylvania Campaign for Clean Water Stormwater
Workgroup (Workgroup)

Severn Riverkeeper Program

Izaak Walton League, a national conservation organization

Anne Arundel Water Access Committee

Federal Government

US Geological Survey

US Army Corps of Engineers

US Environmental Protection Agency

Public Comments on Draft Management Strategies

Chesapeake Bay Foundation

- Need local level targets
- Need to prioritize implementation at local levels
- Need timelines for taking action
- Federal Government should lead by example
- Great job on citizen stewardship; track progress
- Prioritize research needs for SAV

Choose Clean Water Coalition

- WQ MS needs better public and local gov. involvement
- Support programs that build capacity of NGOs
- Support climate change considerations in other MSs
- Need baseline and better data for diversity strategy
- Strongly support the Environmental Literacy MSs
- Need permanent protection of forest buffers
- Need robust local technical assistance
- Toxics and Tree canopy MSs will not meet outcomes

Maryland Sierra Club

- Need to ensure sufficient funding and adequate staffing at the state and local level, and the political will

Sierra Club Form letter

- Climate MS needs clearer baselines and commitments

Virginia Assoc. of Municipal Wastewater Agencies

- Objects to ref. of biosolids as potential source of PCBs
- Objects to making one sector bear “consequences” if another source sector fails to meet their goals
- Concerned that “local targets” could imply a legal obligation
- Objects to higher standards for discharges to healthy waters

Public Comments on Draft Management Strategies

Local Government Advisory Committee

- Need to clearly describe role of local government in achieving outcomes
- Need to identify costs and benefits to local governments and how to access tools and resources
- Need to educate local governments about the Agreement and expectations—especially clarify voluntary and mandatory components.
- Need to improve communication with local officials

CBP Citizens Advisory Committee

- US Dept. of Education needs to be an official partner
- Need baseline data on current diversity and strategies
- Local Leadership MS should focus more on rivers and local waters
- Need more concrete steps on delivering the message using existing local government associations
- Climate MS need to focus on more than just coastal communities
- Need to incentivize private landowner actions
- Wetlands MS seems to be very early draft; Need jurisdiction-specific goals for restoration and enhancement
- Need better prioritization for forest buffers
- Need to focus on quality, not just quantity, of access sites

Public Comments on Draft Management Strategies

Themes

Blue Crab

- Harvest of female blue crabs should be further restricted.
- Explicitly state the role and jurisdictional rights of the strategy partners.

Oysters

- Limit harvest of wild oysters / promoting aquaculture
- Oyster Industry/Seafood industry should be involved in the restoration planning process.
- Comments from individual citizens.

Stream Health

- Support local efforts
- Need better monitoring and tools

Forest Buffers

- Overall support for strategy

Healthy Watersheds

- Need clear definition of healthy waters

Water Quality

- include more specifics in MS, e.g. targeting local participation and cross outcome collaboration
- Need more detail on Phase III WIP development and 2-year milestones

Toxics

- Need to reflect fracking, microbeads, other specific toxics
- Need PCB requirements/monitoring

Local Leadership

- Need clearer expectations, tools, resources for local leaders

Diversity

- Improve baseline and current conditions; establish numeric funding goals
- Provide organizational demographics file for all signatories, partners and NGOs

Climate Resiliency

- Need to establish clear baselines and identify how climate change will impact water quality.

Fisheries GIT / Public Input Summary

Blue Crab

- Harvest of female blue crabs should be further restricted.
- Explicitly state the role and jurisdictional rights of the strategy partners.

Oysters

- Limit harvest of wild oysters / promote aquaculture
- Oyster Industry/Seafood industry should be involved in the restoration planning process.
- Comments from individual citizens.

Forage Fish

- Few comments received. Important to consider whole ecosystem; need forage fish for predators.

Fish Habitat

- Few comments received. Should coordinate efforts with fish barrier removal projects.

Habitats GIT / Public Input Summary

Wetlands

- Eliminate the practice of wetland mowing
- Does not offer a strategy to increase restoration
- Develop jurisdiction-specific acreage goals for restoration/enhancement
- Factors and Targeting/Prioritization tools sections should include climate factors from the Black Duck management strategy and how to leverage targeting efforts for black ducks
- Expand local engagement section under participating partners
- Define wetland restoration vs wetland creation and state that wetland restoration (where wetlands historically existed) is typically more successful
- Include a discussion and outline on methods and techniques partners would use to restore, develop and mitigate wetlands.

Black Duck

- Clarify if the current estimate of black duck food availability is sufficient or insufficient to support 100,000 black ducks
- Strategy needs to estimate how much habitat (by type, condition, size, location) is required to support population objective
- Black Ducks are supposed to be “indicator” species for other waterfowl. Add text to management approach on the science needed to improve tools and management of black ducks and other waterfowl.

Habitats GIT / Public Input Summary

Stream Health

- Don't allow waste treatment facilities to open the overflow into streams
- Regulatory agencies should support local efforts and innovative technology.
- Agree with the strategy's comments on permitting issues, but may lead to many more questionable projects being implemented and spending more money on in-channel projects.
- Look at Macro-invertebrates at a species level to better understand a system response with respect to stressors
- Needs to be clarified that this is a strategy about gaining understanding, not prioritizing implementation at this point....

Brook Trout

- Put a cap on human population growth
- There needs to be more focus on how science will support management approaches and associated tools
- Include shale gas drilling as a specific factor influencing
- Restoration of riparian shade could do much to restore brook trout habitat

Fish Passage

- The Gaps need to include science/management gaps beyond funding.
- Coordinate with the identified fish barrier removal projects in the Anacostia Watershed Restoration Plan

Habitats GIT / Public Input Summary

SAV

- Increase on the ground efforts
- Better to align black duck outcome as SAV adjacent to wetlands may be critical for both outcomes
- Support CPB's efforts to protect and restore natural SAV in small estuaries and along the Potomac
- Fails to address whether local governments have a general or specific role in achieving the outcome
- Could be improved by better recognizing and discussing the opportunities and challenges for SAV based on salinity/geographic region.
- Coordinate efforts with shellfish restoration

STAR / Public Input Summary

Climate Resiliency

- The activities listed did not elaborate on how a baseline will be determined.
- Need to more clearly define the role of local governments and how local governments will get the tools and resources they need to assist with implementation.
- The management strategy should provide more detail on how exactly the integration of climate change adaptation into all the management strategies will take place.

Water Quality GIT/ Public Input Summary

WIPs/Standards Attainment and Monitoring

- The WQGIT received 46 public comments on the Water Quality Management Strategy. Many of the comments requested that we add additional language on verification and local engagement, which we have done. Other comments required a level of detail that is more appropriate to address in the work plans (e.g. additional detail on state-specific source sector strategies that are either included (or will be included) in the two-year milestones or WIP).

Water Quality GIT/ Public Input Summary

Forest Buffer

- Comments received from 36 individuals/orgs; much of it positive feedback
- Many suggested additions or repeated points already included in the Strategy. Some comments will be considered during workplan development
- Several comments contradicted one another: e.g., 3-4 comments were regarding the need to do more for conservation easements on RFB while one commenter thought that was a distraction.
- No controversial comments needing MB attention.

Urban Tree Canopy

- Comments received from 14 individuals/organizations; Clean Water Coalition provided a number of comments
- Overall positive feedback –some recommended additional language or clarification which we incorporated; others were more detailed suggested actions, which we will consider in the workplan development process;
- One point to be aware of is the state annual targets table in the Outcome section will need to be revisited during workplan development because they were set back in late 2013 and may need to be adjusted to meet 2025 target

Toxics Workgroup/ Public Input Summary

Toxics Policy and Prevention

- Additional contaminants
- PMPs only when WLA exceeded
- PCB WLAs in wastewater permits – WQBELs only
- More data/emphasis placed on 1668 – adequate/more needed, how to fill any gaps (as done by DRBC), legal context for 1668
- Suggestion that biosolids may be a source
- Clarify the purpose of the site cleanup risk criteria action
- Improvements to TMDLs
- Feds should undertake voluntary phase-out
- How do different WQSs impact progress?

Toxics Research

- Additional issues of emerging concern (fracking, pesticides)
- Prioritizing contaminants based on relative risk
- Management practices (biosolids, WWTP, ag and stormwater benefit)
- Better connection between research and P&P strategies

Issue for PSC Consideration:

Several commenters stated that the Policy and Prevention Strategy was incomplete because it does not address contaminants beyond PCBs. Response:

- The outcome was deliberately limited to PCBs as a starting point
- Additional contaminants will be addressed
- The TCW has begun to work on fact finding for mercury
- An approach for prioritizing other contaminants will be developed

Should additional jurisdiction-specific issues be mentioned, for example cancer lesions on fish in the Susquehanna, micro-plastic beads, etc.?

Healthy Watersheds GIT/ Public Input Summary

Healthy Watersheds

- Ensure that the term “healthy waters and watersheds” is defined for each jurisdiction – in particular, expand on definitions as defined by Delaware and D.C.
- Highlight the importance of state and federal actions and programs that alter land use, and need to influence such activities as we also attempt to help local governments become better stewards for healthy watershed maintenance.
- Suggestions related to changing or adding words and sentences, clarifying points, moving paragraphs to more appropriate sections and adding new headings.
- Suggestions related to adding, removing or expanding on examples and references focused on healthy watershed protection and benefits.
- Other supportive comments.

Healthy Watersheds GIT / Public Input Summary

Land Use Options

- There were no comments to substantially change the management strategy approach.
- Suggestions related to changing or adding text and sentences, defining terms, including other examples, information and groups to engage with.
- Make specific points, such as the need to harmonize economic development objectives with environmental objectives, design tax incentives to discourage land conversion in some areas and encourage it in other areas, address the problem of an aging population in working lands and other challenges, etc.
- Other supportive comments that justify the need for this outcome.

Land Use Methods/Metrics

- Suggestions related to changing or adding text and sentences, defining terms, including other examples, information and groups to engage with.
- Clarify the role of local governments.
- Question whether the intent is to measure all types of land conversion.
- Other supportive comments that justify the need for this outcome.

Stewardship GIT/ Public Input Summary

Citizen Stewardship

- Partners need to learn the social, economic, environmental priority issues and find innovative ways to assist using environmental principles that also meet CBP priorities.
- Need to convert volunteerism to lifelong stewardship, especially in underserved communities
- Students must be engaged in volunteerism that connects with education, community enrichment, economic success.
- Volunteer programs must also engage students with internships, jobs, and college programs
- Develop methodology to measure and track citizen stewards.
- Encourage and support partnerships between NGOs and local governments to support local governments efforts including permit implementation.
- Balance priority setting and targeting through processes that adequately reflects the need of a community while also weighing impact on local environmental condition.

Protected Lands

- Need, interest and support for additional resources and staffing in order to achieve protected lands outcome and strategy approaches.
- Need for increased specificity in the strategy on groups that will be targeted for communication to increase public awareness of land conservation.
- Clarify and add more detail regarding Landscape future data layers and function.
- Incorporate factors such as changes in land use and climate change into management approach.

Stewardship GIT/ Public Input Summary

Public Access

- Set a goal/target of increasing the percentage of Bay watershed shoreline in each state that is publicly accessible
- Camping access should be added and count toward meeting the current 300-site goal
- Create an inventory of all the bridges crossing navigable and fishable rivers and streams
- Include obstructions such as high guard rails, fences, and lack of parking as factors limiting access
- All bridge construction and reconstruction projects currently in the planning and design process should be reviewed to ensure that waterway access is incorporated into planned construction or reconstruction
- Federal agencies with land holdings should be required to develop a plan, schedule and process for enhancing public water-based access at their facilities
- Department of Defense should clean up contaminated sites
- Army Corps of Engineers should explore enhancing public water-based recreation in the Chesapeake watershed associated with its navigation and public works projects.
- Ensure that stormwater management techniques does not become a deterrent for public access to the waterway
- Seek innovative solutions and partnerships and highlight models of success that create new public water access.
- Federal and state partners should make funding for public water access a priority
- New Public Access Sites Should Be Prioritized For Development in Urban Areas
- More...

Stewardship GIT/ Public Input Summary

Environmental Literacy

- US Department of Education should be included as an official partner of the Chesapeake Bay Program
- Partnership should coordinate environmental literacy efforts at the state and local level
- A management approach should include an employment and professional engagement workgroup
- Strategy should support afterschool programs and other non-formal education opportunities

Issue for PSC Consideration:

- CAC continues to recommend that the U.S. Department of Education become an official partner with the Bay Program to assist states and local governments in achieving the Environmental Literacy goal by providing federal resources through existing programs to support Environmental Literacy. Among the best opportunities to advance Environmental Literacy is through the Next Generation Science Standards, Common Core or similar state standards, and STEM, and U.S. Dept. of Education can provide financial support to develop Environmental Literacy.

How can the PSC help facilitate Departments of Education participation?

Diversity Workgroup/ Public Input Summary

Diversity Strategy

- Support and expand on successful local programs/projects
- Enhance baseline section – need more non-profit information in particular
- CBP Partners should work with local community leaders to address “self-identified community concerns” – address social, economic, and environmental concerns at nexus points
- Collaborate with environmental justice entities and recruit from minority serving institutions in the Bay region to achieve diversity goals

Partnering/Leadership GIT/Public Input Summary

Local Leadership

- Lacks detail and needs to include more specific and targeted actions
- Needs more emphasis on cross-outcome collaboration
- Edit the document for clarity and readability
- Seek input from local officials before developing the workplan

Issues for PSC Consideration:

No specific comments need the attention of the Management Board but a couple of concerns have been raised related to this and other management strategies:

- There is confusion about what this strategy is supposed to do in relation to the other strategies (particularly water quality). Local leaders need awareness, information and knowledge on all these natural resource issues. Local action through innovation will be key to achieving the Bay Agreement goals.
- Where will increased resources be coming from for new areas of CBP emphasis? We are already seeing some problems. We suggest that there be standard wording in all management strategies in the workplan section that suggests that:
 - (1) not all management activities will be started right away, but will be prioritized based on need and available resources, and
 - (2) the workplan is intended to be highlighting what will be done by all participating signatories and interested stakeholders using pertinent, available funding and other resources to achieve workplan outcomes.

How can the PSC help encourage resources (staffing and other resources) will be available to implement these strategies?

Public Comments on Draft Management Strategies

Questions?