

Draft 3/28/14

COMMENT PERIOD 2 - Draft Chesapeake Watershed Agreement 11/8/13

Stakeholder Comments (Public Individuals, Organizations with Standing)

Key	Text Formatting:	<i>italicized = not in current draft</i>
	red: strikethrough	highlight = technical change, new goal/outcome recommendation
	green: addition	blue = partner-stakeholder comment theme overlap

**Comments expressing simple support for what already exists in the agreement have been exported to the 3rd tab.

Row #	Agreement Section Tag	Theme	Comment	Source	Date
1	Preamble	Accountability	While the draft Agreement recognizes that “measurable results coupled with firm accountability yield the most significant results,”1 this agreement fails to provide the accountability mechanisms necessary for success.	Conservation Pennsylvania, Choose Clean Water Coalition, Virginia League of Conservation Voters, Potomac Conservancy, Potomac Riverkeeper	3/17/2014, 3/13/2014, 3/13/2014, 3/17/2014, 3/17/2014

1 Preamble	Adaptive Management	<p>the Final Draft still lacks a strong statement supporting adaptive management. Plans pursuant to the Agreement must be revised over time as we gain a better understanding of the underlying scientific connection between management practices and water quality response. The only reference to adaptive management relates to internal governance: “Adaptively manage all levels of the Partnership to foster continuous improvement.” VAMWA recommends that the Preamble section of the Final Draft be revised to include a statement in support of adaptive management during the implementation phase of the Bay Agreement. “Measurable results coupled with firm accountability” suggests we will not have the flexibility to manage differently ten years into implementation if we find an approach that reduces nutrients and/or sediment at a lower-cost or in a more socially acceptable way.</p>	VAMWA	3/17/2014
1 Preamble	Conflict of Voluntary vs Regulatory	<p>Preamble states that “Watershed restoration and protection efforts have shown that measurable results coupled with firm accountability yield the most significant results.” VAMWA questions the inclusion of this sentence for several reasons, ... VAMWA believes the partners must break from the traditional paradigm of calling for point source consequences when other sources contribute more in terms of total load and, along those lines, avoid any language in the new agreement that implies consequences for point sources that meet their 2010 TMDL allocations.</p>	VAMWA	3/17/2014
1 Preamble	Citizen stewardship	<p>It is also important to recognize in the preamble and in language describing this [Local Stewardship] goal, that the partnership’s methods and plan of action will likely change when more diverse participants are included. It should be clear that our intent is to not simply inform but to seek common ground between the needs of the Bay restoration effort and the needs of the watershed's diverse residents. The new Bay agreement currently speaks more to those already involved in and informed about Bay restoration. As the Bay restoration effort seeks to involve more diverse watershed residents it should be understood that our current methods may change due to the new ideas and perspectives of those joining the environmental conversation.</p>	Alliance for the Chesapeake Bay	3/17/2014

1 Preamble	Local Governments	<p>Given the specific and direct role that local governments and utilities have in implementation, beyond just being a stakeholder, we recommend the following addition to the current Preamble text:</p> <p>“Local governments are key partners as are individual citizens, businesses, watershed groups and other non-governmental organizations. Working together to engage, empower and facilitate these partners, especially local governments and utilities that implement many projects and programs, will leverage resources and ensure better outcomes.”</p> <p>The sixth paragraph states that watershed restoration and protection efforts will not yield the most significant results if progress cannot be measured and accountability is not ensured. This statement is not supported by the facts and needs to be retracted.</p>	MWashCOG	3/17/2014
1 Preamble	Accountability		HRSD	3/17/2014
1 Preamble	Local Governments	<p>In order to facilitate and strengthen direct funding of local soil and water conservation districts for BMP implementation, we recommend that language from the current "Preamble" regarding local governments as 'individual citizens, businesses, watershed groups and other non- governmental organizations' be amended to specifically include soil and water conservation districts and be adopted as a formal Goal with management strategies describing the method of direct support from the Environmental Protection Agency and the Chesapeake Bay Commission as the anticipated Outcome.</p> <p>address economic and social sustainability to ensure significant results. For example, if a water body is impacted by nitrogen and 10% of the total nitrogen load to that water body originates with one source sector and 90% of the total load originates with another source sector one will not achieve the most significant results simply because the sector with the lower load is readily measureable and there is accountability for that load through a regulatory permit. The Bay Program Partnership needs to break from the traditional paradigm of controlling the loads of some sectors when other sources contribute much more load and that load can be reduced for comparable or less cost. This point is made in the last paragraph of the preamble as well as the Vision statement in the Agreement. The text addresses cost rather than affordability. The Partners must determine whether actions based on this agreement are affordable even if they are deemed the lowest cost option.</p>	Otsego County Soil & Water Conservation District, NY	3/17/2014
1 Preamble	Economic Sustainability		HRSC	3/17/2014

1 Preamble	Adaptive Management	Review of actions related to the most recent agreement identified the short-comings of not using an adaptive management approach when implementing these actions. Adaptive management of all agreement-related actions should be emphasized in the Preamble.	HRSC	3/17/2014
1 Preamble	Climate Change	In the Preamble, fourth paragraph, the ending of the first sentence, should be changed from "changing environmental conditions" to "climate change".	Audubon MD DC	3/17/2014
1 Preamble	Available as a Resource for Local Governments Objectives	The Preamble to the Draft Agreement provides "that progress must be made in a strategic manner, focusing on efforts that will achieve the most cost-effective results" with a commitment "to achieving restoration success while maximizing the economic benefits to local communities across the region." (Emphasis added.) Further, the Principles of the Draft Agreement commits to "acknowledge, support and embrace local governments" and "achieve goals and outcomes...at the least possible cost to our citizens." Given the membership and objective of the Clean Chesapeake Coalition, we are available as a resource to achieve the Partnership's core standards of cost effective results and maximum economic benefits to local communities.	Clean Chesapeake Coalition	3/17/2014
1 Preamble	Entrepreneurs as Partners	Page 2, Preamble, Fifth Paragraph (new text underlined and italicized): One of the most important lessons learned from the past three decades is that, while watershed-wide partnerships help to coordinate and catalyze, implementation happens locally. Local governments are key partners as are individual citizens, businesses, entrepreneurs. watershed groups and other non- governmental organizations. Working together to engage, empower and facilitate these partners will leverage resources and ensure better outcomes.	National Water Quality Trading Alliance	3/17/2014
2 Vision	Water Access	"access to the water". It seems, at a minimum, that this element has already been met as written; we have access to the water but we have not addressed whether the degree of access is acceptable in the Vision statement. The statement could be improved by stating " increased access to the water" to better characterize the inferred intent.	HRSC	3/17/2014
2 Vision	Environmental Justice	The statement addresses environmental and economic sustainability but does not address social sustainability. ... Although the term "diversity" is used in the Vision statement it does not necessarily mean that if is socially acceptable.	HRSC	3/17/2014
3 Principles	Climate Change	Why is there no acknowledgement of climate change ?	Tom Coleman	1/30/2014

3 Principles	Climate Change Goal	<p>Clarifying expectations and roles of the various jurisdictions in the new Agreement, should not preclude the development of, and commitment to, strong goals and outcomes. For example, the current omission of any outcome for toxic contaminants, nor mention or consideration of climate change in the draft agreement, is incredibly short-sighted and quite frankly, an embarrassment, for what is considered to be the “premier” restoration program in the country. Ensure the new Chesapeake Bay Agreement includes goals specific to toxic contaminants and climate change.</p> <p>**DOUBLE POST see Toxics section</p>	CBF	12/6/2013
3 Principles	Climate Change	<p>With all of the obvious impacts of existing and future Global Climate Change... an in-depth discussion of impacts and their reduction should be included in this agreement. Otherwise a MAJOR Chesapeake ecosystem driver will be missed.</p> <p>Climate change is purely political. What exactly can you expect to accomplish by including some climate change provision in the federal consent decree? Will fixing the stormwater runoff be affected within the next 25 years by climate change - no, not likely, and if it did, how? The predictions are all over the map. Will the Bay water rise to the extent that pollution reduction measures applied within the next 25 years be negatively effected - no, not likely, and if it did, how? Will pollution reduction measures adopted by point source discharges be negatively affected by climate change in the near future - no, not likely, and if it did, how? If you can’t answer those questions, it will do no good to include some convoluted climate change language in the agreement.</p>	Gregory Moser	2/3/2014
3 Principles	Climate Change - Unrealistic Inclusion	<p>As a resident of Hampton Roads, Va., I am surprised and troubled by the omission, in this agreement, of a comprehensive evaluation of climate change/sea level rise on the Bay watershed. We must have an urgent call for action on this issue. We are literally drowning here. Our region is #2, behind only New Orleans, with assets at risk from sea level rise/climate change. This includes not only our homes and businesses, but tourism, aquaculture, our huge military presence and defense contractors, and the deep water port of Hampton Roads. Now is the time to step up to the plate and address this issue head on... with management/adaptation options and funding proposals. This is arguably the preeminent issue of our time, and the most important issue for the sustainability of our Bay watershed</p>	Dennis S.	2/4/2014
3 Principles	Climate Change		Mary Picardi	3/4/2014

3 Principles	Transparency - Define It	<p>The Agreement begins with partnership principles, one of which is to “Operate with transparency in program decisions, policies, actions and progress to strengthen public confidence in our efforts. (Page 4)</p> <p>The term “transparency” is seemingly clear, but clearly vague. This reviewer suggests defining exactly what is meant by “transparency,” as political agendas will inevitably distort transparency to achieve desired outcomes</p>	Allan Straughan	2/13/2014
3 Principles	Accountability	<p>EPA, using its authority under Clean Water Action Section 117(g), needs to ensure the Bay jurisdictions stay on track, achieve their milestone commitments, or face consequences for failure. In addition, we encourage the States and the District to continue to engage interested stakeholders in their implementation efforts. In Pennsylvania, for example, we are concerned with a notable decline in emphasis on Bay issues as manifested by less frequent meetings of various advisory committees and workgroups. These meetings were vital to providing clarity of intent and understanding of technical issues and responsibilities among federal, state, and local agencies, the regulated community, and others stakeholders.</p>	CBF	12/6/13
3 Principles		<p>Create a new Chesapeake Bay Agreement that is broad in scope, aggressive in action, and effective in outcome.</p>	CBF	12/6/13
3 Principles	Transparency	<p>Pg4 - There are problems with the principles as outlined. With adoption of the Bay TMDL and the increased role of EPA (Washington and Philadelphia), decisions have been made by EPA independent of the collaborative effort. EPA has in certain instances disregarded the partnership or science and the unanimous consensus of the partnership and has operated without transparency or utilize science-based decision making. For example, in the spring of 2010 EPA made the decision to disregard the unanimous opinion of the partnership that the phase 5.3 watershed model was fatally flawed because of EPA unilateral decisions regarding the impact of agricultural nutrient management (no benefit for commercial fertilized lands). Also, the phase 5.3 model misrepresented the amount and distribution of urban lands that was also considered a fatal flaw by the partnership jurisdictions. These are examples of EPA overriding the unanimous consensus of the partnership that is contrary to both science-based decision making and to working collaboratively with transparency or with consensus.</p>	Kenn Pattison	3/6/14

3 Principles	Monitoring	<p>Pg4 – “Maintain a coordinated watershed monitoring and research program...” An additional action would be to better evaluate the water-quality data that has been collected over the last few decades. For the Susquehanna River there is a wealth of water-quality available, including data for high flow and base flow regimes. Analysis of this data could provide management with a better understanding of how implementation of BMPs over the last 30 years has resulted in improving the water quality during runoff events and improvements in groundwater quality during base flow conditions.</p>	Kenn Pattison	3/6/14
3 Principles	Climate Change	<p>Anthropogenic climate change (and related side-effects, like ocean acidification and sea-level rise) should be addressed by specific goals. It’s all strongly supported science and all of the “Academies of Science” (or national equivalent) of the developed world support the main conclusions re: climate changes because of (or mainly) due to rapid ramp-up to man’s green-house gas (GHG) emissions since the Industrial Revolution. The adverse affects of these increasing levels of GHGs will be delayed (beyond my lifetime) but most of the increasing GHGs are cumulative plus long-lasting (maybe ~century for CO2) in our atmosphere</p>	John B Reeves	3/6/14
3 Principles	Science, Implementation	<p>Subject “Agreement” must foster, seek out and catalyze new science and technology and “on the ground” sustainable progress</p>	John B Reeves	3/6/14

3 Principles	Climate Change	<p>Considering the increasing role of climate impacts in the health of the Chesapeake Bay, we need to include the term climate change in the new Chesapeake Bay Agreement. Climate impacts are considerably more complex than is implied by the terms "sea level rise, rising temperatures, and increased precipitation". Climate change encompasses a wide range of stressors that will increasingly determine the fate of our aquatic eco-systems. Protecting the Chesapeake Bay from climate impacts for the long term will be a huge challenge for natural resource policy makers and conservation managers alike. In order to meet this challenge, we need to be prepared. <u>We need: extensive adaptation research; implementation of adaptation strategies; and dedicated leadership</u> at the Chesapeake Bay Program to integrate climate concerns into the agency's work. These goals need to be explicitly articulated in the Chesapeake Bay Agreement. I appreciate your leadership in ensuring that the term climate change gets incorporated into the new Chesapeake Bay Agreement. Even more important, we are counting on you to include explicit climate change-related goals in the new Agreement. Without goals, there is no accountability and no measure of progress, which we cannot afford when it comes to the challenge of protecting our waterways from climate impacts.</p> <p>The agreement should be modified to include goals specific to toxic contaminants and climate change.</p>	Sierra Club - MD & VA - <u>1330+ Constituents</u>	3/3/14
3 Principles	Climate Change		Joseph Valentine	3/10/14
3 Principles	Focus on Implementation	<p>This is simply another glorified mission statement. Words, words, words...it's the bottom line that counts!! We know what has to be done. Why are we not able to implement necessary actions? Too many factions. Too many soft spoken, politically correct, afraid to offend someone, people. We just can't seem to get out of our own way. I am 78 and have been listening to this stuff for years. I have a waterfront property and have watched the decline of grasses, crabs, oysters and fish, for years. I see no improvement, just words. Do something!!! If I am wrong and have misunderstood what I just read, please correct me. I came to the bay years ago. I wanted to leave something of value to my grandchildren and, instead, am leaving them a bay that is worse than when I came here, years ago.</p>	A. Jay Peikin	2/4/2014

3 Principles	Climate Change - Changing Weather Trends Goal and Outcome	<p>Goal- Changing Trends in Weather Patterns: There is no longer any reasonable disagreement with the fact that changing weather patterns will impact the Chesapeake Bay Watershed. It is our duty to future generations to understand and engage in reducing our impacts that will harm the living resources of the watershed.</p> <p>Changing Weather Pattern Trends Study Outcome: Chesapeake Bay watershed states should invest in ongoing scientific analysis of changing trends in weather conditions and sea-level rise in the Chesapeake Bay watershed. Studies for the most economically efficient ways to reduce these impacts, and the specific targets for reductions in each jurisdiction, shall be completed by 2017.</p> <p>Changing Weather Pattern Implementation Outcome: By 2019, jurisdictions will make use of the aforementioned studies to promote policies designed to reverse or alleviate the impact of climate change and sea-level rise in the Bay watershed.</p>	SOLS/SRK	3/7/2014
3 Principles	Climate Change - Incorporate Consistently Throughout	Anticipating Changing Conditions: The brief mention of long-term sea level, temperature, and precipitation trends is the only reference to Climate Change. Although a politically volatile term, Climate Change includes natural systems within the Bay that are already changing. Regardless of the mechanisms behind these “long-term trends” it is highly irresponsible and negligent to relegate them to a single line when the Chesapeake Bay is a worldwide hotspot for ocean acidification and relative sea-level rise. The agreement must be grounded in reality and can work to make authentic progress by consistently incorporating the precautionary principle and ideas of resilience	Bernice O'Brien	3/14/2014
3 Principles	Climate Change	Sea Level rise and climate change pose significant impacts for the Chesapeake Bay in the future. Between the predictions of rising sea level and warming water temperatures, these elements are something that needs to be considered in goals. The habitat the Bay supports is extremely vulnerable and crucial to so many variables. It is important that these factors be taken into consideration at this point in the process	Nic H	3/16/2014
3 Principles	Climate Change	I do feel there should be a separate group to address climate control issues and rising water levels because global warming is out of the control of the participating states. It is difficult to envision how sanctions could be applied for non-compliance	Theresa M Winter	3/16/2014

3 Principles	Climate Change	<p>Anticipating changing conditions is an important factor for improving the Bay. Understanding that we cannot account for natural changes in sea-level rise and other environmental trends acknowledges that we can only control for our behavior. Also, we must understand how natural forces influence our judgment of progress. ... Furthermore, the agreement mentions sea-level rise and long-term environmental trends, but it does not explicitly mention climate change. The implementation strategies are scientifically based, so how can the document exclude one of the most concerning phenomena of our generation. Just as climate change will affect every aspect of our lives in the future, it will definitely have a major impact on the Bay’s health and our strategies to preserve it.</p>	Chad	3/17/2014
3 Principles	Climate Change	<p>Please include specific mention of climate change impacts on Chesapeake Bay (especially given that most, if not all, of the goals established in the agreement are affected by climate change impacts) and what you propose must be done to mitigate climate change impacts on the Bay.</p>	Christine M Robinson, JMU	3/18/2014
4 Principles	Climate change	<p>Instead of “anticipates changing conditions, including longterm trends in sea level rise...” it should say “both addresses ongoing climate impacts and anticipates changing conditions, including longterm trends in sea level, temperature, precipitation, and other aspects of environmental variability caused by climate change.”</p>	<p>Conservation Pennsylvania, Virginia League of Conservation Voters, Virginia Conservation Network</p>	<p>3/17/2014, 3/13/2014, 3/17/2014</p>
3 Principles	Climate change	<p>It is profoundly disappointing to see no measures to reduce the emissions that contribute to climate change nor to mitigate or adapt to climate change as part of efforts to save the Bay. Not only do we need to reduce emissions from energy generation but also from transportation. The end users -- buildings and transportation represent about 80% of greenhouse gas emissions. See reports like Growing Cooler and Moving Cooler, by national groups and Cool Communities by the Coalition for Smarter Growth. Finally, not only does compact land use reduce transportation emissions, it allows for us to save land that will be necessary for wetland retreat zones as sea level rises.</p>	Coalition for Smarter Growth	3/17/2014

3 Principles	Financing & Transparency	VAMWA recommends adding the following to the Principles section of the document: “Consider the affordability of management strategies as an integral part of their work in developing implementation approaches.” This will improve the Partnership’s standing with the public, which is often skeptical of environmental programs, requirements, and fees. This will help convey that while we are working diligently to make environmental improvements, we have not forgotten that the average citizen is the one footing the bill for the work.	VAMWA, MAMWA	3/17/2014
3 Principles	Build Off Vision	We would have expected to find instead a statement of principles that builds on the Vision Statement (p. 3), such as (1) Fostering Environmental Stewardship; (2) Encouraging Stakeholder Support; (3) Making Improvements Over Time; (4) Maintaining the Bay’s Cultural Heritage.	VAMWA	3/17/2014
3 Principles	Climate Change	Climate change. As mentioned above, the draft Agreement references “changing environmental conditions” and the principles state that the partners will “anticipate changing conditions, including longer-term trends in sea level, temperature, precipitation, land use and other variables.” We believe that the challenges posed by climate change are of such a magnitude that they warrant greater emphasis in the Agreement. For example, the Vital Habitats section of the Agreement should include an outcome ensuring that the effects of climate change on the Bay’s living resources are documented and that strategies for adapting to climate change are developed.	The Nature Conservancy	3/17/2014
3 Principles	Climate Change	Under "Anticipate changing conditions" add: "climate" after "temperature"	SWQAC	3/13/2014

3 Principles	Climate Change	<p>In the future, the greatest threat to wetlands and habitat will be climate change. Sea level rise will impact tidal habitats as temperature and rain/drought cycles will impact non-tidal wetlands systems. Beyond wetlands many of the draft agreement's other habitat goals will be compromised by climate change. ... This draft agreement relegates land use and climate change impacts to one sentence stating the need to, "Anticipate changing conditions, including long-term trends in sea level rise, temperature, precipitation, land use, and other variables." This single sentence represents a rhetorical parking lot where this agreement abandons some of the most significant challenges facing the Bay's restoration, admittedly some of the most politically controversial issues. It is the sole mention of these issues in a document that is designed to guide and inspire our restoration efforts in the coming decades.</p>	Wetlands Watch, Cecil Land Use Assn	3/11/2013
3 Principles	Climate change	<p>The Agreement should contain language that clearly recognizes that climate change will affect our decisions about restoration actions and the success of our efforts in the future. Language related to management strategies should include consideration of climate change effects and the need for adaptation planning.</p>	Alliance for the Chesapeake Bay	3/17/2014
3 Principles	Adaptive Management	<p>While we support the concept of "adaptive management," we note that along with the flexibility to change course, comes the responsibility to specify, clearly document and publicly communicate the reasons of the change, so that the decision-making process is transparent and understandable to all concerned.</p>	Alliance for the Chesapeake Bay	3/17/2014
3 Principles	Language changes	<p>ecosystem markets. Bullet 12: This very much reads like "convince others that they should join us". We would recommend that more appropriate wording as "Continue to seek common ground between the needsof the Bay restoration effort and the needs of the watershed's diverse residents and communities in order to achieve the long term goals of the Agreement." Bullet 13: Rather than</p>	Alliance for the Chesapeake Bay	3/17/2014

The Final Agreement Should Address Climate Change: **Adapting to climate change should be included throughout the Vital Habitats section**, where outcomes such as tidal wetlands (sea level rise) and brook trout habitat (warming waters) are threatened by the impacts of climate change. The **Land Conservation section should direct land use planning to adapt to climate change impacts related to sea level rise.**

In the **Preamble** of the agreement, **fourth paragraph**, instead of “anticipates changing conditions, including long-term trends in sea level rise...” it should say “both addresses on-going climate impacts and anticipates changing conditions, including long-term trends in sea level, temperature, precipitation, and other aspects of environmental variability caused by climate change.” Further, we urge that the final Agreement should include explicit and concrete goals relating to protecting the physical and biological integrity of our water bodies in the watershed from ongoing and projected changes in environmental conditions. **A climate adaptation goal might read as follows:**

Climate Adaptation Goal: Expand the implementation of climate adaptation practices that center on ecological transitions to ensure that rivers and stream and the Chesapeake Bay continue to maintain biological functioning as environmental conditions change.

Cons Pa, Va
League of Cons
Voters, Va Cons
Network,
Potomac
Riverkeeper,
PennFuture,
Allegheny
Highlands
Alliance, Md Cons
Council, Friends
of the
Rappahannock, 3/17/2014,
NRDC, NWF, 3/13/2014,
Ridgway Hall, 3/17/2014,
SELC, Sierra Club 3/17/2014,
Pa Ch., 70+ 3/17/14,
Individuals 3/12/14

Under the Principles sections in the draft agreement, **under the 8th bullet, instead of “anticipate changing conditions, including long-term trends in sea level rise (...)” it should say “both address current climate impacts and anticipate changing conditions, including long-term trends in sea level, temperature, precipitation, and other aspects of environmental variability caused by climate change.”**

The current draft language might be understood as suggesting that we expect climate impacts in the future, and will address them as they arise. Instead, the Bay and the watershed are experiencing the impacts of changing conditions now. We need to begin to do both, address current climate impacts and anticipate and pro-actively respond to changing conditions.

Climate Change
Adaptation Goal &
Outcomes

Most importantly, the Atlantic, D.C., Maryland, Pennsylvania and Virginia Chapters of the Sierra Club strongly urge the inclusion in the new Chesapeake Bay Watershed Agreement of two explicit and concrete goals relating to protecting the physical and biological integrity of our water bodies in the watershed from on-going and projected changes in environmental conditions. Climate-related goals might read as follows:

Climate Adaptation Goal: Expand the implementation of climate adaptation practices that center on ecological transitions to ensure that rivers and streams and the Chesapeake Bay continue to maintain biological functioning as environmental conditions change.

- 1. **Corridor/Connectivity Outcome:** The creation of species corridors, including in particular restoring and maintaining river connectivity on x number of stream miles, to support the northward migration of species as temperatures increase and seasonal changes occur;
- 2. **River Protection Outcome:** Implementation of practices and land use approaches necessary to pro-actively protect x stream miles from the effects of increased precipitation and severe storm events;
- 3. **Shoreline Habitats Outcome:** Implementation of practices and land use approaches necessary to maintain shoreline habitats on x number of shorelines as they move inland.

		<p>Climate Leadership Goal: Integrate climate change in all management and policy decisions of the Chesapeake Bay Program to prepare and protect the Chesapeake Bay and the rivers and streams in the watershed from climate impacts.</p> <p>1. Climate Coordination Outcome: Create the role of Climate Coordinator at the Chesapeake Bay Program by July of 2014, which would be a leadership role charged with integrating climate concerns in all management and policy decision of the Chesapeake Bay Program, and advance coordination among federal, state and local partners of climate adaptation efforts mounted by the Chesapeake Bay Program;</p> <p>2. Climate Integration Outcome: Integrate climate science and adaptation approaches into the work of the various goal implementation teams to achieve alignment of climate adaption and carbon sequestration goals with all other restoration goals; to be managed by all goal implementation teams.</p> <p>3. Carbon Sequestration Outcome: Assess the carbon sequestration potential associated with forests and wetlands in the Chesapeake Bay Watershed; begin to measure loss of carbon sequestration potential caused by development; integrate planning and goal-setting for maintaining and increasing carbon sequestration potential with water quality and land use goals; coordinate with jurisdictions to include carbon sequestration goals in state climate action plans.</p>			
3 Principles	Climate Leadership Goal & Outcomes			Sierra Club	3/17/2014
3 Principles	Climate Change	<p>In order for the agreement to make lasting improvements to the health of the bay with practices that are sustainable, the partners must facilitate climate change adaptation planning and implementation.</p> <p>The document is all but silent on the subject of Climate Change. Given the impact of sea level rise and increased temperature on our shorelines, our wetlands and other vital habitats, coupled with the forecast increased incidence of more extreme weather events resulting in more extreme and prolonged floods and droughts, it also seems unconscionable not to address Climate Change in the new Agreement.</p>		Susquehanna Greenway	3/17/2014
3 Principles	Climate Change			Rupert Rossetti	3/17/2014
3 Principles	Climate Change	<p>Rising sea level and increased storm intensity could have devastating and far reaching environmental and economic impacts on the Bay ecosystem and the environmental quality of life enjoyed ... As the most daunting challenge of our time, climate change must be addressed in the final agreement</p>		Congressman John Sarbanes	3/17/2014

3 Principles	Language Edits to Current Statements	<p>We offer the following observations and suggested edits to several of the Principles.</p> <p>☐ “Utilize science-based decision making and seek out innovative technologies to support sound and holistic management decisions in a changing system that take into account all environmental impacts including energy, climate, air and water quality.”</p> <p>☐ “Maintain and adequately fund a coordinated watershed-wide monitoring, modeling and research program to support decision-making and track progress and the effectiveness of management actions.” (The Partnership needs to ensure that adequate funding from the states and federal government continues to be provided for all of these critical programs.)</p> <p>☐ “Acknowledge, support and embrace engage local governments and other entities in watershed restoration and protection activities.” (As noted, local governments and utilities actively implement many activities.)</p> <p>☐ “Anticipate and adapt strategies in response to changing conditions, including long-term trends in sea level, temperature, precipitation, <u>climate</u>, land use and other variables.” (This Principle should be worded to be more consistent with the adaptive nature of the Management Strategies that are addressed later in the draft Agreement.)</p> <p>☐ “Adaptively manage all levels of the Partnership to foster continuous improvement.” (It will be critical for the Management Strategies to define processes for how such ‘adaptive management’ will be accomplished if this Principle to be met.)</p>	MWashCOG	3/17/2014
3 Principles	Climate Change	Ensure that the new Agreement includes goals specific to climate change. Virginia also voted against inclusion of any outcome related to climate change, despite growing awareness of the impacts of climate change on Bay systems and the Bay region.	Meredith Dash, former teacher	3/17/2014
3 Principles	Climate Change	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.	Midshore Riverkeeper Conservancy	3/17/2014

		<p>We recommend that language from the previous draft preamble regarding a 'forward-looking approach that anticipates changing conditions,including long-term trends in sea level, temperature, precipitation,and other aspects of environmental variability' be restored to the current draft and be adopted as a formal Goal with management strategies describing approaches to adaptation from the jurisdictions as the anticipated Outcome.</p>			
3 Principles	Climate Change - Goal	<p>Further,and to avoid the gridlock of ideological or irreconcilable arguments regarding causality or programmatic challenges,we recommend that the Goal and Outcome suggested above be described within the text of the Agreement as 'Climate Adaptation Strategies' and that it be kept separate from the Water Quality Goal.</p> <p>This part of the document is important but it does not reflect the core values of the Bay's residents. Principles and core values should represent the drivers for why people want to protect and enhance the Bay. ... a sense of environmental stewardship ... this concept is absent ... the concept of culture and heritage is not found in the Principle section but ... it is referenced in the Vision statement. This section reads more like a list of issues that the authors want to see in the resulting strategy.</p>	Otsego County Soil & Water Conservation District, NY		
3 Principles	Should Reflect Residents Values	<p>ESLC urges the Bay Agreement include a focus on climate change. ... Adding two million acres of conserved land by 2025 is a great goal, but we would request language to include offsetting the land lost to climate change- in addition to the goal amount.</p>	HRSD	3/17/2014	
3 Principles	Climate Change		Eastern Shore Land Conservancy	3/17/2014	
3 Principles	Climate Change	<p>The Agreement should contain language explicitly recognizing the effects of climate change on restoration efforts. Specifically, we suggest that the fourth paragraph on page 2 replace "changing environmental conditions" with "global climate change."</p>	Chesapeake Bay Foundation	3/17/14	
3 Principles	Climate Change	<p>In the Principles section, the eighth principle in the list should be changed from "Anticipates changing conditions....." to "Addresses ongoing climate impacts and anticipates changing conditions caused by climate change, including sea level rise, temperature, precipitation and storm surge."</p> <p>Addressing climate change is equally vital to protect billions of dollars of existing and future investments in infrastructure and to provide the technical assistance and incentives for local governments to adapt to rising Bay and tidal waters, and for our water protection and restoration efforts to be resilient in the face of increasingly extreme weather events.</p>	Audubon MD DC	3/17/14	
3 Principles	Climate change		Anacostia Watershed Association	3/17/2014	

		The Agreement must explicitly state that it will do something to protect the health of the bay, its human and natural communities—there are no outcomes to direct this essential preparedness.	Pennsylvania Campaign for Clean Water - Stormwater Workgroup	3/16/2014
3 Principles	Climate Change			
3 Principles	Climate Change - Goal	there are no Goals and Outcomes to help localities prepare for changing climatic conditions that threaten communities, infrastructure and aquatic health. Adaptation planning is essential for Bay states and cities. The Principles should use more affirmative language to ensure climate change and land use controls such as green infrastructure are not ignored: o “Utilize science-based decision making and...” drive the use of existing and evolving innovative technologies so management strategies ensure clean water and adaptation to “...a changing system.” o “Maintain a coordinated watershed-wide monitoring and research program...” and base recommendations or technical assistance for management on that research “...and track[ed] progress.” o In anticipation of “changing conditions... and other variables” pro-actively establish plans and implement sustainable practices across the watershed. o “Use place-based approaches... while contributing to larger ecosystem goals” and develop these to provide a model for other localities within the basin.	American Rivers	3/17/2014
3 Principles	Climate Change - and Land use		American Rivers	3/17/2014
3 Principles	Land use Options Implementation Outcome	misses the boat by leaving out existing technologies, practices and policies of land use control to benefit clean water that may have been new at the time of the initial Bay agreement but are now scientifically justified, emerging in policies and broadly endorsed including by the U.S. Environmental Protection Agency.	American Rivers	3/17/2014

we note that one of the Partnership's operating principles is to "acknowledge, support and embrace local governments and other local entities in watershed restoration and protection activities." However laudable; **such words "acknowledge, support and embrace" do not sufficiently recognize the fundamental role of local governments in meeting the 2010 Bay TMDL pollution reduction goals**, particularly in Maryland. At the local government level, closest and most responsive to the people, we take seriously the balancing of all aspects of the human environment - the economic, the social, the cultural and the physical/natural environments. Everybody wants to save the Bay. The reasons to save the Bay are limitless and need not be debated. **It is the "how" with limited resources that is still up for debate, adaptation and refinement.**

In order for concerted Bay restoration efforts, either generally or through previous Bay agreements, **to be most effective the voices and role of local governments in developing, financing and implementing water quality improvement programs, policies and practices must be considered and coordinated. Instead of costly mandates with little flexibility** and with questionable water quality improvement outcomes, **each watershed state should harmonize efforts to achieve Bay TMDL goals with local government plans**, policies and programs aimed at water quality improvement in balance with the human environment.

3 Principles	Local Governments		Clean Chesapeake Coalition	3/17/2014
3 Principles	Local Governments	Accordingly, the following Partnership principle is recommended: "Harmonize watershed restoration and protection activities with local government plans, policies and programs proven to improve the water quality of the Bay."	Clean Chesapeake Coalition	3/17/2014
3 Principles	Climate Change	Just as out of touch, the draft Agreement fails to utter the words "climate change." That such a glaring omission is possible in 2014 is embarrassing and inexcusable. In the final Agreement, the authors must acknowledge reality and address the very real impacts that climate change will have—and is already having—on the Bay.	Center for Progressive Reform	3/17/2014

Climate Change issue is not included as part of this framework. Since sea level rise is one of the most clear consequences of climate change for the Bay, it is a must to include it. It should not only be included within the framework but also as a goal. The issues that should be addressed are the increase of acidity that will affect the oysters principally, the increase in runoff because of the increase of storms and the sea level rise. Both, adaptation and mitigation should be tackled in the agreement.

3 Principles

Climate Change

Tatiana Marquez

3/17/2014

The draft Agreement fails to acknowledge or address climate change or its impacts. Adapting to climate change should be included throughout the Vital Habits section, where outcomes such as tidal wetlands (sea level rise) and brook trout habitat (warming waters) are threatened by the impacts of climate change. The Land Conservation section should direct land use planning to adapt to climate change impacts related to sea level rise.

In the Preamble of the agreement, fourth paragraph, instead of “**anticipates changing conditions, including long-term trends in sea level rise...**” it should say “**both addresses on-going climate impacts and anticipates changing conditions, including long-term trends in sea level, temperature, precipitation, and other aspects of environmental variability caused by climate change.**”

Chesapeake Bay watershed states should invest in ongoing scientific analysis of climate change and sea-level rise in the Chesapeake Bay watershed and make use of the best available science to adopt policies designed to reverse or alleviate the impact of climate change and sea-level rise in the Bay watershed.

3 Principles

Climate Change

Clean Water
Action

3/17/2014

We were surprised that climate change was not prominently addressed in this plan. More specifically, the impacts of sea level rise and storm surge need to be considered to improve the resiliency of Chesapeake ecosystems. The use of the best climate science and data is required to inform implementation actions intended to accomplish the principles of the Agreement.

3 Principles

Climate Change

Chesapeake
Conservancy

3/14/2014

3 Principles	Funding Sources, Trading Markets	Page 4, Principles (new text underlined and italicized): In order to better capture the role and benefits of trading and the private market we suggest that additional Principles be added as follows: • Recognize that tax payer funding alone is not sufficient to meet restoration needs and that platforms that promote private sector investment via water quality trading will be sought out and promoted	National Water Quality Trading Alliance	3/17/2014
4 Goals and Outcomes	Interim Objectives	There should be more interim measurable objectives and timetables between now and 2025 , perhaps every 4 or 5 years The most important aspect of the agreement is that it truly represents a commitment on the part of all participants and that all the goals are measurable and succinct. In its current form, many of the current goals are not specific enough to be measurable.	Stuart Stainman	3/4/2014
4 Goals and Outcomes	"SMART-ness"		Joseph Valentine	3/10/2014
4 Goals and Outcomes	Change "modification" to "augmentation"	The ability to adjust the Agreement in the future is reasonable, as long as these adjustments are augmentations of a signatory's commitment to their goals and outcomes. "As the Partnership identifies new opportunities and concerns, goals and outcomes may be adopted or modified." The term "modification" may be seen as imparting the ability to avoid commitments within the Agreement. This should be replaced with "augmentation" or other similar language that specifically declares a jurisdiction will not step back from any Goal or Outcome committed to.	SOLS/LSR	3/7/2014

4 Goals and Outcomes	Baseline Consistency	<p>The Final Agreement Should Ensure Baseline Information is Updated and That Restoration Goals Reflect Net Increases: The draft Agreement contains several outcomes that aim to improve from baseline conditions. While the Stream Health Outcome specifies that the baseline will be re-assessed, and the Fish Passage Outcome indicates the 2011 baseline year will be used, other goals are silent on baselines to be used to calculate success. For example, the Brook Trout Outcome not only fails to indicate a baseline of how much habitat is already occupied, but it fails to specify that the 8% increase must be a net increase from the total occupied habitat in the entire watershed. Additionally, the Forest Buffer Outcome does not include a baseline riparian buffer inventory nor does it specify a minimum width for restored or conserved forest buffers. We suggest forested buffers be at least 150 feet wide. .. For each of the outcomes listed under the “Vital Habitats” goal, the Agreement should indicate the baseline year or amount being used to calculate improvements and should specify that all improvements must be a net increase from the baseline.</p>	Cons Pa, Va League of Cons Voters, Potomac Riverkeeper, PennFuture, Allegheny Highlands Alliance, Rock Creek Cons, Md Cons Council, James River Assn, Friends of the Rappahannock, NRDC, NWF, Ridgway Hall, SELC, Sierra Club Pa Ch., 70+ Individuals	3/17/2014, 3/13/2014, 3/17/2014, 3/17/14, 3/12/14
		<p>It is critical that the Chesapeake Bay Executive Council recommit to watershed-wide pollution reduction goals that will invoke transparency and accountability measures to address the variety of growing threats to life in the Chesapeake Bay Watershed...In order to complete restoration of the Chesapeake Bay and Potomac River, this agreement’s broad suite of goals and outcomes with measured implementation plans must focus and unite the efforts of diverse stakeholders and agencies.</p>	Potomac Conservancy	3/17/2014
4 Goals and Outcomes	Transparency, accountability, partnership			

		<p>The Conservancy recommends specific language with measurable benchmarks to hold signatories accountable for outcomes related to shared TMDL goals through management strategies. Such consistencies across state boundaries will support a watershed-wide focus and more constant data from jurisdiction to jurisdiction. Streamlining efforts across state lines in Maryland, Pennsylvania, Virginia, West Virginia and Washington, DC creates increased transparency and allows stakeholders to promote public trust in the cleanup efforts.</p>	Potomac Conservancy	3/17/2014
4 Goals and Outcomes	Accountability	<p>The Goals and Outcomes section of the Final Draft repeatedly uses the terms “restore”, “enhance”, “achieve”, “improve” and “increase,” but does not define any of these terms.</p> <p>With regard to “restore,” VAMWA reiterates its earlier recommendation that the Agreement not include this term because it suggests that conditions will be returned to their original state. This is not the goal of the Agreement, nor is it possible in many instances.</p>		
4 Goals and Outcomes	Define Terms	<p>VAMWA believes it is imperative that the Agreement explain to the signatories and all stakeholders why a numeric goal is reasonable and attainable in the projected time frame. This could be done in an appendix, but, regardless, an explanation is necessary to gain stakeholder support and to allow the signatories to weigh the goals against likely resource commitments.</p>	VAMWA	3/17/2014
4 Goals and Outcomes	Explain Numeric Goals/Outcomes	<p>a reference to “firm accountability,” and other contract-sounding language (like the 2017/2025 deadlines) is contrary to the voluntary nature of the Agreement. In a similar vein, the introduction to the Goals and Outcomes section must not include the words “The commitments contained in,” because these are goals rather than commitments, and they may change over time as knowledge improves. VAMWA recommends adding a simple savings clause directly to clarify the voluntary nature of the Agreement. The savings clause would confirm that the agreement is neutral in terms of its regulatory effect (no increase or decrease in state or local legal authority and discretion in exercising that authority):</p> <p>This agreement in no manner alters or amends the Clean Water Act or implementing regulations thereunder. This agreement does not (1) relieve any signatory or third party from the requirements of the Act, (2) establish any additional authority of or requirements upon any signatory or non-signatory, or (3) divest any signatory of its authority and discretion under the Act.</p>	VAMWA	3/17/2014
4 Goals and Outcomes	Adaptive Management		VAMWA, MAMWA	3/17/2014

		<p>Like many in the region, the Alliance has been disappointed that the process used to develop this agreement, unlike the Chesapeake 2000 agreement (C2K), has focused primarily on carrying forward some of the existing commitments of the states and federal agencies as outlined in C2K, the federal Executive Order and the TMDL.</p> <p>Further, although many outcomes do offer measurable outcomes, successful accountability for this plan relies largely on actions that are guided by as yet undefined management strategies. While we support the intent to develop these more flexible, adaptive and priority-based management strategies as a realistic path forward, there is still uncertainty about how these processes will generate the collaborative actions that ultimately lead to success.</p>		
4 Goals and Outcomes	Process and Accountability		Alliance for the Chesapeake Bay	3/17/2014
4 Goals and Outcomes	Public Comment	No new or expanded goals should be added to this Agreement unless another public comment period is provided.	MWashCOG	3/17/2014
4 Goals and Outcomes	Introduction	<p>“The goals articulate the desired high-level aspects of our vision; while outcomes related to each goal are the specific, time-bound, measureable and sustainable targets that directly contribute to achievement of the goals.”</p> <p>“As the Partnership identifies new opportunities and concerns, goals, and outcomes, and management strategies may be adopted or modified.”</p>	MWashCOG	3/17/2014
4 Goals and Outcomes	Introduction	<p>the text that “each signatory may exercise its discretion to participate in the development and implementation of individual outcomes’ management strategies...” does not convey a robust commitment by all the parties to the overall restoration effort, and could lead to confusion with the Bay nutrient and sediment TMDLs and related Watershed Implementation (WIP) requirements. We would also note that if such flexibility leads to economic imbalances in the watershed, this could be an issue at local levels.</p>	MWashCOG	3/17/2014
4 Goals and Outcomes	Discretionary Language	<p>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.</p>	MWashCOG	3/17/2014
4 Goals and Outcomes			Midshore Riverkeeper Conservancy	3/17/2014

4 Goals and Outcomes	Commitments vs Goals/Targets	<p>The first sentence should not include the words "The commitments contained in" because these are goals/targets rather than commitments. Goals and targets may or may not be met.</p> <p>The text seems to randomly use the terms "restore", "enhance", "achieve", "improve" and "increase" when referring to goals and outcomes but the meaning for these terms can be different. It is recommended that the text avoid using the term "restore" because it infers that conditions will be returned to the original state; this is not the over-arching goal of the Agreement. The Agreement is intended to support achievement of goals such as water quality standards or to make improvements where standards do not exist. The circumstances when these conditions are met will often be different than those realized in the Bay's original state.</p>	HRSD	3/17/2014
4 Goals and Outcomes	Define Terms	<p>The Agreement authors need to explain the basis for each numeric outcome and how the Partners will know that the goal is reasonable and can be attained in the projected time frame. This could be done in an appendix document for the Agreement but this explanation is necessary for stakeholder support to be realized and for the Partners to weigh the goals against the commitments in resources that will be necessary to achieve the goals.</p>	HRSD	3/17/2014
4 Goals and Outcomes	Numeric Outcome Explanations	<p>The fourth paragraph makes statements equating actions and results that may not be defensible. The second sentence states that improvements in habitat and water quality lead to healthier living resources. This is not unconditionally true and there can be many reasons why this relationship is not realized in the watershed. One obvious reason is when habitat and water quality already meet the designated uses defined by a Partner's water quality standards. Water quality can be acceptable but sediment quality can be unacceptable and living resources can be impacted. Water quality and habitat can be acceptable but fishing pressure can destroy a population. The text should read "...quality can lead to healthier ...". The same can be said for the fourth sentence, "Better water quality can mean swimmable,...".</p>	HRSD	3/17/2014
4 Goals and Outcomes	Assumptions of Actions & Results		HRSD	3/17/2014

4 Goals and Outcomes	Accountability	<p>Recommendations for Transparency and Accountability: Each signatory and federal agency should indicate, in the Agreement, the outcomes with which they will be involved. The decision to change outcomes should be endorsed by the Executive Council.</p> <ul style="list-style-type: none"> • Language in the 3rd paragraph on page 5 completely undermines the spirit and commitment of the new Agreement i.e., “Except for those outcomes required by law and related to the Chesapeake Bay Total Maximum Daily Load...each signatory may exercise its discretion to participate in the development and implementation of individual outcomes’ management strategies...” • We suggest striking this paragraph and instead allowing each signatory and federal agency to indicate, in the Agreement, the outcomes with which they will be involved. • We suggest, however, that the Agreement include broad language to allow flexibility in the definition of “implementation.” 	Chesapeake Bay Foundation	3/17/2014
4 Goals and Outcomes	Accountability	<p>We remain concerned about the decision to allow the PSC to change the outcomes. The goals and outcomes of other Bay Agreements have not been subject to change by the PSC, without Executive Council endorsement. Under the current operating structure, discussions and decisions by the PSC are not publicized and so the only way for the “interested public” to find out the status of a particular issue, is by checking the PSC web page.</p>	Chesapeake Bay Foundation	3/17/2014
4 Goals and Outcomes	Adaptive Management	<p>While we support the concept of “adaptive management,” we note that along with the flexibility to change course, comes the responsibility to specify and clearly document the reasons for the change, so that the decision-making process is transparent and understandable.</p>	Chesapeake Bay Foundation	3/17/2014
4 Goals and Outcomes	Climate Change	<p>Add a new goal on Climate Adaptation: “Expand the implementation of climate adaptation practices to ensure that rivers, tidal marshes, and the Chesapeake Bay continue to maintain biological functioning as environmental conditions change.”</p>	Audubon MD DC	3/17/2014
4 Goals and Outcomes	Support	<p>Support: Outcomes to increase wetlands, tree canopies in urban areas and forested buffers represent some of the most fundamental best management or green infrastructure practices to stabilize soil, reduce peak flows and provide additional benefits for natural and human habitats. These practices are simple and efficient to implement and maintain.</p>	Pennsylvania Campaign for Clean Water - Stormwater Workgroup	3/16/2014

4 Goals and Outcomes	2017 deadline for all outcome	<p>Since the TMDL established 2017 as the deadline for having met 60% of the requirements, the bay Agreement should use this same date to establish a deadline for the first part of the outcomes.</p> <p>Page 5, Goals and Outcomes, Second Paragraph (new text underlined and italicized): The management strategies, further described in the next section of this Agreement, articulate the actions necessary to achieve the goals and outcomes identified below. This work will require effort from many, including all levels of government, academic institutions, non-governmental organizations, watershed groups, entrepreneurs. businesses. and individual citizens. Local government will continue to play a unique and critical role in helping the Partnership realize the shared VISION for the Chesapeake Bay. As the Partnership identifies new opportunities and concerns, goals and outcomes may be adopted or modified."</p>	Tatiana Marquez	3/17/2014
4 Goals and Outcomes	Entrepreneurs and Business Engagement	<p>We are concerned that some of the stated goals and associated outcomes are not realistic and may impose requirements on private property which are not enforceable. For instance the outcomes pertaining to Forest Buffer and Urban Tree Canopy. Much of the riparian forest buffer within the Bay watershed lies on private property. How will the states who sign this agreement encourage or compel private property owners to plant trees to restore riparian buffer areas or to increase urban tree canopy? The stated outcomes in this agreement need to be carefully examined to ensure that there is no expectation that local governments (particularly regulated MS4 localities) will be expected to accomplish impossible tasks on private property or infringe on property rights. Overly ambitious goals which are unrealistic will only weaken the Watershed Agreement and these must be scaled back.</p> <p>The burden of achieving the Bay Program goals should not fall to the regulated sector alone (i.e. MS4 regulated communities, Wastewater, etc.) but must be shared by all including the Agricultural sector, unregulated communities, boaters, and private landowners. Goals must be realistic and take into account existing limitations on what can be achieved. We</p>	National Water Quality Trading Alliance	3/17/2014
4 Goals and Outcomes	Unrealistic, Private Property Issues		Chesapeake, Va	3/17/2014

5 Sustainable Fisheries Goal	Clam Dredging Affects WQ	<p>3. Is the use of clam dredges in the Miles River an environmental practice? Obviously, the clams think so because they dredge year after year for more and more clams. But, how is the practice affecting other species and water quality in the long run? Huge clouds of muddy, silty water flowing in the Miles’ tidal stream is alarmingly visible. Is that okay? Seems counter to “clean water acts” to create such a disturbance. Is there a benefit?</p>	Michael Keene	2/3/2014
5 Sustainable Fisheries Goal	Overharvesting - Inadequate Policies	<p>On the other hand, work on the Sustainable Fisheries leaves much to be desired. Virginia and to only a lesser extent, Maryland, continue to kowtow to commercial interest when it is clear that stocks are being devastated. I don’t have a problem with watermen or industry “harvesting”. I do have a problem with continuing to allow them to PLUNDER our fishery resources. The Menhaden catch that is permitted in Virginia is a travesty that Maryland and the other Bay states should not condone by action or silence.</p> <p>On oysters, crabs and rockfish, Maryland has shown a willingness to do the right thing, and yet, policies are still woefully inadequate and give far too much consideration to watermen and other commercial lobbyists. Watermen’s contention that oyster dredging promotes growth and restoration is a myth as current science has clearly proven. The state shouldn’t listen to this self-serving argument and should clearly state that it is unfounded.</p> <p>Maryland has done a commendable job of promoting oyster aquaculture and improving monitoring of poachers and enforcement. It has done a poor job of establishing constructive rules for “demonstration leases”</p>	Frank DiGialleonardo	3/10/2014
5 Sustainable Fisheries Goal	Freshwater Fisheries Outcome	<p>Sustainable Fisheries: This section is good for the Bay, but the freshwater tributary fisheries require commitment to improve declining recreational fish populations. Suggested additional outcome: Freshwater Fisheries Outcome: Dedicate needed resources to find the causes of the disease and declines in freshwater species in Chesapeake tributaries, including the recreationally valuable smallmouth bass. Implement solutions to these problems by 2020.</p>	SOLS/LSR	3/7/2014

		<p>The underlying comment is that finfish fisheries should be managed from an ecosystem perspective and not just from an individual fish stock perspective. The agreement generally alludes to ecosystem based management, but doesn't say anything specifically relating to finfish.</p> <p>In support of the underlying comment, please evaluate adding the following two outcomes to the sustainable fisheries section:</p> <ol style="list-style-type: none"> 1. Fishery managers develop policies, plans and a database to allow management of finfish species from an ecosystem perspective. 2. Develop population targets for finfish species that support a robust Chesapeake Bay ecosystem. <p>The comment and suggested outcomes sort of expand upon the outcome pertaining to forage fish that is already in the sustainable fisheries section. It seems like the agreement has points relating to water quality and habitat, but it doesn't ever get to an ultimate end target for finfish populations that support a robust ecosystem</p>	Douglas Beckmann	3/14/2014
5 Sustainable Fisheries Goal	New Outcomes - Finfish			
5 Sustainable Fisheries Goal	Introduction	after "habitat loss, poor water quality" insert: " non-native and invasive species, and toxics. "	SWQAC	3/13/2014
5 Sustainable Fisheries Goal	Shad, Rockfish, Herring	On the Sustainable Fisheries page, I was surprised not to see any mention of Shad, Rockfish and Herring . These are/were important resources up at the Head of the Bay. If the document is supposed to "reach" the average citizen, then these fish deserve a mention in this section as well as on the Vital Habitats page.	Rupert Rossetti	3/17/2014
5 Sustainable Fisheries Goal	Clam Dredging Affects WQ	CBF supports the existing outcomes in the draft Agreement and encourages the partners to ensure these outcomes are maintained in the final Agreement.	Chesapeake Bay Foundation	3/17/2014
5 Sustainable Fisheries Goal	Pa Should Opt Out	We support the over-arching theme but do not feel that the Commonwealth should be held accountable for this measureable. Therefore we would support Pennsylvania "opting out" of this goal. We do support the Commonwealth focusing on improving local water quality of impaired waterways in the State which would in turn ultimately help in meeting this goal for the other States.	PennAg	3/17/2014
6 Blue Crab Abundance Outcome	Explain Numeric Outcomes	The Blue Crab Abundance Outcome does not identify how often the population targets should be refined.	VAMWA	3/17/2014

6 Blue Crab Abundance Outcome	Target Adjustment Frequency	The Blue Crab Abundance Outcome does not identify how often the population targets should be refined.	HRSD	3/17/2014
6 Blue Crab Abundance Outcome	% increase	Blue Crab Abundance Outcome: Include a % of increase in population.	Tatiana Marquez	3/1/7/14
7 Blue Crab Management Outcome	Ocean Acidification	Neither the Blue Crab or Oyster outcomes mention ocean acidification , which will have significant ecological and economic impacts on Bay fisheries within the coming decades **DOUBLE POST - see Oyster section	Bernice O'Brien	3/14/2014
7 Blue Crab Management Outcome	Not Measurable	The Blue Crab Management Outcome does not state a measureable goal for improving the ability to manage the population and fishery and does not define a deadline for this outcome.	HRSD	3/17/2014
8 Oyster Outcome	Tributaries - increase, define	You've halved the 13505 Executive Order goal with respect to oysters, from 20 to 10 tributaries. I think you should stay with 20, and further, some <u>definition of what a tributary actually is should be provided.</u> For example, in Virginia, I am aware that there is a push to consider the Elizabeth River a tributary for restoration, and also the Lafayette River, which is a tributary river of the Elizabeth River, as a tributary for restoration. What they are essentially doing is picking a small, heavily polluted and condemned river and one of its side branches to cover 2 of the 5 tributary rivers for Virginia. If this is how the goal will be implemented, little progress will be made	Dave Schulte	1/31/2014
8 Oyster Outcome	Large Oyster Sanctuaries - Easier to Enforce	1. Make some of the rivers and river mouths designated in your oyster restoration plan oyster sanctuaries areas. This will provide seed oysters in the future for the rest of the bay and reduce single cell algae blooms from the river mouth areas which increase oxygen depletion problems and reduce the growth of submerged aquatic vegetation. By making large areas harvest free zones it will also be much easier to mark and enforce and than trying to police selected dispersed areas which has been virtually impossible in the past	James Blair	1/31/2014

8 Oyster Outcome	Oyster Collapse - ocean WQ stress	<p>Our once-blue Mid-Atlantic ocean waters have grown greener & greener since the oyster collapse. Where shell is fine for a put & take fishery; shell & shell mimics have not been useful as substrates for oyster-reef ecosystem restoration. More vertical surface appears crucial.</p> <p>With green water sometimes extending 60 miles offshore these days, white marlin are now often pushed beyond canyon’s edge in search of clear water in which they can feed. Even bluefish are 4X further out than 35 years ago.</p> <p>Chesapeake outflows are trapped in an enormous eddy. Because ocean waters are nearly a meter higher on the north side the world’s most powerful current, its evident that the Gulf Stream dams the very weak terminus of the Labrador current as it wanders south and inshore to a finish: Along the shelf waters of the southern Mid-Atlantic Bight flushing is minimized.</p> <p>Water quality collapse cumulative, your problems are greater than the Chesapeake’s.</p> <p>Seek to imitate successes in oyster reef restoration - not methods with a multi-decadal history of failure.</p> <p>You must not lose the fight for water quality. Our marine fisheries & ecosystem are stressed enough.</p>	Cpt Monty Hawkins	2/2/2014
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8 Oyster Outcome	Scale Back	<p>Pg6- “Oyster Outcome: Restore native oyster habitat and populations in 10 tributaries by 2025 to recover the benefits of fish habitat and water quality improvements that healthy oyster reefs provide.” The wording of this goal is vague. How can the native oyster reefs be restored in the 10 tributaries when the USACE destroyed many of the native natural reefs for navigation purposes? It is impossible to restore the reefs as they once existed. Reefs could only be restored in areas not impacting navigation and those would only be a fraction of the native reef system that existed prior to USACE navigation activities. Therefore, this is an unobtainable goal assuming an answer to the disease problem facing the native oyster can first be determined.</p> <p>I suggest scaling this goal back to something that is at least remotely possible, such as considering a goal based on those areas where it is feasible to re-establish reefs. Trying to return an extirpated species such as the Chesapeake oyster to native populations is not realistic within the indicated timeframe and needs to be modified.</p>	Kenn Pattison	3//6/14
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8 Oyster Outcome	Conowingo Dam - Sediment Flow	Dredge the sediment on the Penn. side of the Conowingo Dam so when the locks are opened during heavy rains, the sediment on that side does not flow over the dam and into the Chesapeake Bay, thus silting our Bay and smoothing our oyster bars. Then open the oyster bars in the upper Bay to powerdredging so the oyster bars can be cleared of the sediment and become productive oyster bars, filtering the Bay and creating oyster bars for watermen to work for years to come **DOUBLE POST see Conowingo section	Bubbly Powley	2/28/2014
8 Oyster Outcome	Aquaculture	While fledgling in size, aquaculture will start to play a major role in water quality improvement, fish and crab habitat while providing an economic engine to helping the bay. I did not see any reference to the potential that oyster farming can do for helping the bay	Bob Parkinson	3/4/2014
8 Oyster Outcome	Make Higher Priority	waters There should be higher priority to increase oyster population to use natural filtering of polluted	Stuart Stainman	3/4/2014
8 Oyster Outcome	Outreach to Agriculture Industry	Harris Creek has been deemed an oyster sanctuary by State agencies. Great! Are we (the agencies) working with the local farmers whose fields border Harris? Are we providing them with the education and alternatives to chemical use on their fields that would marry well with the sanctuary program?	Michael Keene	2/3/2014
8 Oyster Outcome	Ocean Acidification	Neither the Blue Crab or Oyster outcomes mention ocean acidification , which will have significant ecological and economic impacts on Bay fisheries within the coming decades **DOUBLE POST - see Blue Crab section	Bernice O'Brien	3/14/2014
8 Oyster Outcome	Define Conditions	The Oyster Outcome does not define the conditions when habitat and populations have been deemed restored. It will not be possible to determine when the outcome has been met without this information	HRSD	3/17/2014
8 Oyster Outcome	Revised Outcome	the following amended Partnership outcome is recommended: "Oyster Outcome: Restore native oyster habitat and populations in the upper Bay and in -I-G tributaries by 2025 to recover the benefits of fish habitat and water quality improvements that healthy oyster population reefS provides, and to support a viable oyster fishery."	Clean Chesapeake Coalition	3/17/2014
8 Oyster Outcome	more specific	Oyster Outcome: In the 2000 Bay Agreement the increase in oyster population was much more specific	Tatiana Marquez	3/1/714

8 Oyster Outcome	Protect Existing Reefs	Oyster Outcome: CCA Maryland believes actions advanced through the Agreement can help to ensure that future oyster restoration activities are truly beneficial for the larger Bay ecosystem, beyond the commercial fishery alone. We support the goal of restoring native oysters to ten Bay tributaries by 2025; initiatives should be targeted to methods that have been scientifically demonstrated to provide the greatest opportunity for restoring the native oyster population. Additionally, we believe the Agreement should note the importance of measures to protect existing reefs while efforts are undertaken throughout the Bay to establish additional oyster populations. The viability of existing reef ecosystems and their physical structure, such as Man O’ War Shoal in the Upper Bay, should not be sacrificed for efforts that do not have clearly defined goals and legally-binding funding commitments that will clear serve the larger purpose of restoring native oyster populations in the Bay.	Coastal Conservation Association Md	3/17/2014
9 Forage Fish Outcome	Menhaden	Menhaden restoration is also critical to provide a forage base for development and the reproductive health and recruitment of all game and food fish species and for the reduction of single cell algae by these once abundant filter feeders that feed on phyto and zoo plankton	James Blair	1/31/2014
9 Forage Fish Outcome	Menhaden	The wholesale destruction of menhaden is something that needs more action. It is a valuable part of the bay food chain. There were few crabs and no striper last season.	David Conlon	2/12/2014
9 Forage Fish Outcome	Overharvesting	Reduce the take of food fish, forage fish, and shellfish as much as necessary to achieve healthy populations that will bring back the abundance of past decades. This has worked with the blue crab and rockfish; it should be done for all depleted fish and shellfish.	George and Frenes Alderson	2/21/2014

9 Forage Fish Outcome	Menhaden - Data Availability	<p>I am the Senior Fisheries Biologist for Omega Protein Corporation and a member of the Sustainable Fisheries Goal Implementation Team. My comments are directed at the following language: “By 2016, develop a strategy for assessing the forage fish base available as food for predatory species in the Chesapeake Bay.” I believe that this is a laudable goal; however, there are a number of complexities that should be considered that will have a significant impact on the outcome of this effort. First, I assume that by “assessing the forage fish base” you mean assessments for abundance or biomass using mathematical models. Several years ago the ASMFC Atlantic Menhaden Technical Committee considered a modeling effort to assess Atlantic menhaden in the Chesapeake Bay (CB). The effort failed, largely because there were not enough data available to result in a reliable outcome. It should be noted that there are considerable data available on Atlantic menhaden in the CB. This means that considerable additional effort to collect data will be needed to conduct reliable stock assessments on species that might get categorized as forage.</p>	Ron Lukens	2/27/2014
9 Forage Fish Outcome	Define "Forage Fish" Criteria	<p>It also should be noted that the most abundant forage species in the CB is probably the bay anchovy. Very little data exist for this species, even though it is quite common and generally accepted to be an important component of the CB’s ecology. Finally, I would expect there to be some contention about what species should be included as “forage fish.” In reality, most species of fish and invertebrates are forage for some predators at some point in their life histories. It will be important to establish criteria by which species are included as forage, and such criteria must go beyond the highly abundant schooling species like menhaden and anchovy.</p>	Ron Lukens	2/27/2014
9 Forage Fish Outcome	Complex Factors Influencing	<p>I understand that the outcome by 2016 is a strategy for assessing forage fish availability; however, I offer my comments to forewarn that this could result in a complex, expensive, and contentious process. I should also note, there are other complexities that will arise during this process that I have not addressed, such as seasonal and climate-regime variability in both forage and predator species.</p>	Ron Lukens	2/27/2014
9 Forage Fish Outcome	Explain Numeric Outcomes	<p>Menhaden should specifically be referenced in the Forage Fish Outcome, with specific goals for addressing their populations and fisheries.</p>	VAMWA	3/17/2014
9 Forage Fish Outcome	Menhaden	<p>The Forage Fish Outcome needs to specifically address menhaden and provide specific, measureable goals and deadlines for addressing menhaden populations and fisheries.</p>	HRSD	3/17/2014

9 Forage Fish Outcome	Lag Between Study & Action	<p>Forage Fish Outcome: Steps should be taken to shorten the time between studying the forage fish base and implementing action to sustain it. Two years to simply develop a strategy for assessment is a significant amount of time; there should be no delay in action on this issue. More specifically, CCA Maryland urges the partnership to focus on the impact of the current commercial menhaden fishery. Emphasis should not be placed solely on the relative status of the menhaden population itself, but also on the role in the Bay-wide ecosystem as a filter-feeder and as a critical food source for many other key species. Following the development of the strategy and the subsequent assessment, the partnership should work toward a longer-term goal of ensuring the species is properly managed in accordance with the findings.</p>	Coastal Conservation Association Md	3/17/2014
10 Habitat Outcome	Focus on Oysters	<p>We feel that the portion in the Agreement that speaks of the building up of habitats should be focused on oysters. There would be many benefits for the watermen, the public, and the industries that use oysters. If there were more oysters, then watermen would be more productive and would better contribute to the economy. With watermen harvesting more oysters, the restaurant industry that focuses on oysters will be able to process more oysters for public consumption. Also, oyster prices for consumption will go down which will draw more consumers and will further the economy. As a byproduct of the oyster consumption, the shells can also be processed and used in the construction industry which will further the economy. Oysters also help filter the bay which reduces sediment pollution and decreases water turbidity which benefits other species, especially underwater grasses. As a result, the build up of oyster reefs should be a priority of the Chesapeake Watershed Agreement. The Agreement should specify in what ways oyster reefs should be built up. Some examples could be having research facilities and hatcheries build artificial reefs and produce and then release more oyster spat into the bay</p>	Claire Sargo	3/4/2014
10 Habitat Outcome	More Specific	<p>The Fish Habitat outcome should list the critical fish and shellfish species that will be addressed.</p>	VAMWA	3/17/2014
10 Habitat Outcome	Measurable	<p>The Fish Habitat Outcome does not quantify a specific and measureable goal or deadline. Therefore the Partners will not know what efforts they are committing to in the Agreement. Further the Outcome should list the "important" fish and shellfish to be addressed.</p>	HRSD	3/17/2014

10 Habitat Outcome	Communication	Fish Habitat Outcome: Efforts to assess and catalog important fish habitats throughout the Bay provide a necessary foundation for effective restoration and conservation actions. CCA Maryland certainly urges Agreement partners to continue and expand on these efforts, but also requests that this information be made readily available to the public for better targeting of limited non-public conservation resources. The timely integration and availability of such data on existing web-based GIS networks would clearly be in line with the Partnership's principle of transparency and science based decision making.	Coastal Conservation Association Md	3/17/2014
11 Vital Habitats Goal	Urban Habitat, Habitat Destruction by Development	The vital habitat outcomes largely ignore urban land uses , which increasingly affect the Bay watershed. Urban outcomes for wetlands, stream health, and high-priority species should be included along with a discussion of low-impact development	Bernice O'Brien	3/14/2014
12 Vital Habitats Goal	Climate change	Adapting to climate change should be included throughout the Vital Habits section, where outcomes such as tidal wetlands (sea level rise) and brook trout habitat (warming waters) are threatened by the impacts of climate change.	Conservation Pennsylvania, Virginia League of Conservation Voters	3/17/2014, 3/13/2014
11 Vital Habitats Goal	Ammending Vital Habitats Goal	The final Agreement should amend Vital Habitats Outcomes to enhance tree canopy goals and wetlands protection . It should set a stronger standard for increased tree canopy. As compared to the scale of Washington, DC and even Montgomery County, MD alone, the January 29th draft tree canopy goals for 2,400 acres by 2025 is incredibly weak. School districts at the county level have committed to greater net increase of tree canopy cover in less time than the 2025 deadline. At the very minimum, the final agreement should include a goal of 10,000 acres.	Potomac Conservancy	3/17/2014
11 Vital Habitats Goal	Baseline goals/explanation	The Wetlands outcome seeks to create or re-establish 85,000 acres of tidal or non-tidal wetlands and enhance the function of 150,000 acres of degraded wetlands by 2025. However, the FY 2011 Progress report states a wetlands restoration goal of 30,000 acres by 2025. It is unclear why the new draft Agreement is increasing the goal by 55,000 acres. Also, the Forest Buffer Outcome requires restoration of 900 miles per year of riparian forest buffers and conserves existing buffers until at least 70% of riparian areas are forested. The FY 2012 Action Plan calls for the same number of miles per year of restoration but the goal is a total of 63% forested areas instead of 70%. There is no explanation in the Agreement whether an increase in the baseline is warranted given current progress and the looming 2017 benchmark.	Maryland State Builders Association	3/17/2014

11 Vital Habitats Goal	Climate Change	Climate change. As mentioned above, the draft Agreement references “changing environmental conditions” and the principles state that the partners will “anticipate changing conditions, including longer-term trends in sea level, temperature, precipitation, land use and other variables.” We believe that the challenges posed by climate change are of such a magnitude that they warrant greater emphasis in the Agreement. For example, the Vital Habitats section of the Agreement should include an outcome ensuring that the effects of climate change on the Bay’s living resources are documented and that strategies for adapting to climate change are developed.	The Nature Conservancy	3/17/2014
11 Vital Habitats Goal	Introduction	after "conserving healthy habitats and restoring the" insert: " connectivity and " Climate change should be included throughout the Vital Habits section. The introductory paragraph should be amended to the following (underlined text is the proposed to be inserted). "Conserving healthy habitats, restoring the function of degraded habitats, and increasing the resilience of coastal habitats in the face of sea level rise , is essential to the long-term resilience and sustainability of the ecosystem..."	SWQAC	3/13/2014
11 Vital Habitats Goal	Ammending Vital Habitats intro		Audubon md dc	3/17/2014
11 Vital Habitats Goal	Ammending Vital Habitats Goal	Edit: "Restore, enhance, and protect a network of land and water habitats, in the face of climate change and other threats , to support high-priority species and to afford other public benefits, including water quality, recreational uses and scenic value across the watershed."		
11 Vital Habitats Goal	Climate Change	An additional wetlands outcome under the Vital Habitats goal should be focused on evaluating opportunities for tidal wetland migration in the face of sea level rise.	Chesapeake Bay Foundation	3/17/2014
11 Vital Habitats Goal	Invasive Species	We support the intent of this goal however would caution for the consideration and inclusion of how invasive aquatic species factor into obtaining this goal.	PennAg	3/17/2014
11 Vital Habitats Goal	2 stage targets	In all the specific outcomes in this goal, it will be much more effective to divide the outcomes in two stages, the first one to be accomplished in 2017 and the second one in 2025	Tatiana Marquez	3/17/2014
12 Wetlands Outcome	Unrealistic Timescale	Pg7- The wetlands outcome is as unrealistic as the oyster goal. Based on progress reporting to date, the year these goals would be achieved is most likely to be beyond 2025.	Kenn Pattison	3//6/14

12 Wetlands Outcome	Additional Data Exists	Under Wetlands Outcomes, the goal is to create or re-establish 85,000 acres of wetlands, an admirable goal. We may be closer than we think in some areas and I will explain. If you analyze the National Wetlands Inventory, for example for Adams County, Pennsylvania you will note primarily bodies of water such as lake and ponds. What is missing from this inventory of Adams County is groundwater supported wetlands, swampy areas and delineated wetlands. How can we document these existing wetlands? Looking specifically at delineated wetlands, many are recorded on property deed descriptions but have not been added to a wetlands data layer; could the Partnership provide the necessary resources to create this data layer?	Bicky Redman	3/13/2014
12 Wetlands Outcome	More specific outcomes	The Final Agreement should also incorporate specific outcomes for tidal and non-tidal wetlands protection and recovery. It is of critical importance that the final agreement consider the need for wetland buffers to mitigate disastrous impacts of the increasing number of extreme weather events.	Potomac Conservancy	3/17/2014
12 Wetlands Outcome	Inadequate Outcome	On the specific wetlands goals laid out in this proposed agreement, it is unclear how many of the restoration acres are tidal wetlands and how many are non-tidal. In order to have a meaningful accounting and assessment of loss and gains in vital habitats, non-tidal wetlands and tidal wetlands should be listed and reported separately. This allocation of wetland restoration has impacts on the wildlife and living systems goals laid out elsewhere in the draft agreement. In addition, it is unclear whether these restoration goals include the 10,259 acres carried forward from the unmet goals under the C2K agreement. In the same vein, it is unclear whether the wetlands restoration goals are net of the loss of wetlands due to sea level rise, which in some regions of the Bay, such as the Blackwater National Wildlife Refuge, are being observed and measured today.	Wetlands Watch	3/11/2014
12 Wetlands Outcome	Reporting Issues	a nagging problem of wetlands restoration reporting. A review of wetlands restoration/creation reporting over the last ten years shows significant variation in reporting numbers. In addition, interviews with state agency staff in two Bay states exposed significant issues around reporting and the reliability of the restoration/creation numbers being reported and conflicts in the way these wetland restoration/creation efforts are categorized. Without consistent reporting, the wetlands goals in this draft agreement cannot be achieved with any level of confidence.	Wetlands Watch	3/11/2014

		On the Vital Habitats page, it is hard to understand the Wetlands outcome. What does creating / reestablishing the 85,000 acres & enhance 150,000 acres mean in the big picture? Is there any way to include something similar to the Forest Buffer outcome in which the end goal is to ensure that 70% of riparian areas are forested. That is a goal the impact of which one can immediately visualize.		
13 Wetlands Outcome	Define Terms	**DOUBLE POST see Forestry Outcomes section	Rupert Rossetti	3/17/2014
13 Wetlands Outcome	Define Terms	It is unclear in the Wetlands Outcome as to what metric is used to define when the "enhance" objective has been met.	HRSD	3/17/2014
12 Wetlands Outcome	Climate change	"Create or re-establish 85,000 acres of tidal and non-tidal wetlands and enhance function and resilience to sea level rise of an additional 150,000 acres of degraded wetlands by 2025."	Audubon md dc	3/17/2014
13 Black Duck Sub-Outcome	Climate change	By 2025, restore wetland habitats and increase resilience to sea level rise , to support a wintering population of 100,000 black duck, a species representative of the health of tidal marshes across the watershed.	Audubon md dc	3/17/2014
Black Duck Sub-Outcome	change outcome	Broaden the indicator of tidal marsh health beyond the single species of the American Black Duck; possibly to include all puddle ducks that winter in the Chesapeake Bay watershed.	David Caldwell	3/17/2014
13 Black Duck Sub-Outcome	Support the Ducks	The Black Duck Outcome should be to increase wetland habitats to support the desired wintering population rather than to "restore" .	HRSD	3/17/2014
14 Stream Health Outcome	Off 303d not equal to healthy	Stream health outcome may be problematic, since most states do not characterize healthy waters but characterize their impaired waters as mandated by the 303(d) lists each state produces every other year . How can you restore stream health by 10% when you don't know the condition that existed in 2008? Just because a stream did not show up on the 303(d) dirty waters list does not necessarily mean it was healthy . It may be that the stream/stream segment has yet to be assessed. the Stream Health Outcome is vague. In what way will the stream be improved and how will this be measured? How can the public verify or quantify the value of these improvements? The stated goal of 10% improvement sounds potentially like a goal that is too easy to reach . I understand the desire to set attainable goals, so as to produce a pattern of success, but empty achievements are not helpful.	Kenn Pattison	3//6/14
14 Stream Health Outcome	Vague, Not Aspirational		Patrick Torborg	3/9/2014
14 Stream Health Outcome	10% Average	The Stream Health Outcome would be more defensible and attainable if it were written to improve stream health and function by 10%, on average (versus across the entire Watershed).	VAMWA	3/17/2014

14 Stream Health Outcome	Define Terms	Also on that page, please footnote the meaning of the comment in the Stream Health outcome “*Note: baseline will be re-assessed.” My instinctive reaction was a negative one.	Rupert Rossetti	3/17/2014
14 Stream Health Outcome	Non-Signatory Participation	COG’s members need to be involved in any discussions with the designated Goal Implementation Team regarding stream health - given the direct role and responsibility our local governments have in addressing local water quality.	MWashCOG	3/17/2014
14 Stream Health Outcome	Average the Outcome	The Stream Health Outcome seems to be written for the entire Bay and applicable to each watershed rather than the average. A more defensible and attainable goal would be to improve stream health and function by 10%, on average.	HRSD	3/17/2014
14 Stream Health Outcome	strengthen outcome	Stream Health outcome is vague. It is important to identify the functions to ensure that the functions which are expected to increase by 10% are those that will ensure improvement to stream health.	American Rivers	3/17/2014
15 Brook Trout Sub-Outcome	Management Strategy Including All Signatories	Achieving this outcome will not b easy. It will require significant resources from and collaboration among many partners. Given this challenge, we are concerned that the potential failure of one or more key signatories to participate may limit our ability to restore brook trout at the scale envisioned in teh agreement. To that end, we ask that you use the Agreement to foster collaboration among signatories in crafting a brook trout management strategy and, through implementation of the Agreement, ensure that the necessary resources are made available to signatories to succeed in achieving the brook trout outcome.	Trout Unlimited (on behalf of 16,000+ members)	3/14/2014
15 Brook Trout Sub-Outcome	Occupied Habitat	Outcome confuses restoration and an increase in occupied habitat. The outcome should be to increase and sustain occupied habitat by 8% by 2025. The Brook Trout Outcome should be to "improve" rather than "restore".	HRSD	3/17/2014

16 Fish Passage Outcome	Dam Removal & Relicensing	<p>The Fish Passage Outcome of additional stream miles should be increased, and include supporting Best Available Technology during any licensing or re-licensing of hydro-electric dams. Throughout the watershed there are obsolete dams that can be removed, each of which should add a minimum of 10 new miles of tributaries to provide habitat for migratory fish. If each of the three states that contain the largest percentages of the Chesapeake Bay Watershed were to commit to 70 dam removals by 2025 (7 per year per state), the effort should easily add 2,000 additional stream miles. We would also add the sentence: “In addition, we will support the best available technology for the most protective upstream and downstream migration through and around hydroelectric dams during any licensing or re-licensing procedures.”</p>	SOLS/LSR	3/7/2014
16 Fish Passage Outcome	Dam Removal	One way to increase habitat is to improve fish passage by removing outdated dams such as those historically installed in the name of flood control	Tom Benzing	3/11/2014
16 Fish Passage Outcome	Sustain Migratory Routes	The Fish Passage Outcome confuses restoration of migratory routes with increases in stream miles with species present. The outcome should be to increase and sustain migratory routes for these species by increasing the number of stream miles with these species present by one thousand.	HRSD	3/17/2014
16 Fish Passage Outcome	strengthen outcome	Fish Passage outcome is also vague. Improved passage for fish can be achieved by an array of tactics including passage structures and barrier removal (dams, ford or culverts.) To adequately achieve “opening 1,000 additional stream miles” priority should be given to barrier removal over features such as fish ladders or rock ramps.	American Rivers	3/17/2014
16 Fish Passage Outcome	Dam Removal	<p>Dams are a very important issue that must be evaluated for the health of the bay.</p> <p>The agreements must include an outcome related to tear down useless dams or fix them to permit aquatic life to move freely</p>	Tatiana Marquez	3/17/2014
17 SAV Outcome	Restore Filter Feeders	By restoring filter feeders like oyster and menhaden that feed on singled cell aglae many of the associated problems like oxygen depletion, and light penetration needed by SAV’s will take care of themselves. Once Submerged aquatic vegetation has been restored they will work as a sanctuary and nursery area for small fish, crabs, eels, shrimp and other species and help reduce siltation problems	James Blair	1/31/2014

17 SAV Outcome	Inform Public of SAV BMPs	<p>In the 25 years I have boated/fished on Harris Creek, perhaps, 3 of those years there have been grasses growing so thick that it would stop an outboard motor or catch the keel of a sailboat to a dead stop. These were wonderful summers for the health of the Creek/Bay. What happened to them? Why do some years the grasses grow and some they do not. Is it the chemical use of the farmers in conjunction with the timing of rainfalls? What is it? What can we do to allow the SAV's to flourish?</p>	Michael Keene	2/3/2014
17 SAV Outcome	Unrealistic; Reinstate UAA	<p>The Submerged Aquatic Vegetation (SAV) Outcome is also very optimistic. It has been shown at the CBP Modeling Workgroup (formerly the Modeling Subcommittee) that in many of the areas where SAV beds once existed that the habitat for SAV no longer exists. Those areas are now part of the basis for the SAV goal even though the habitat for SAV no longer exists and therefore will never be restored in those locations. This is why in 2007 and 2008 EPA began a Use Attainability Analysis (UAA) for the SAV goals. Had a science-based decision processes been utilized and the UAA allowed to continue, it would have been possible to actually describe the use that is there and set a standard that has a chance of implementation. Unfortunately political decisions were allowed to overrule science in 2009.</p>	Kenn Pattison	3//6/14
17 SAV Outcome	Prioritize SAV	<p>Be more aggressive in restoring Submerged Aquatic Vegetation (SAVs). Our family has participated in the Chesapeake Bay Foundation's Grasses for the Masses program for three years. Through this program, we have witnessed progress, but it is too slow. I am interested in the Bay states taking a more aggressive approach to helping study the most efficient and effective way of helping restore bay grasses so that our ultimate goal of 180,000 acres may be achieved. My son has learned about interdependence of species and the bay grasses are a prime example. Without them, other species of plants and animals may not survive.</p> <p>Similarly, quantifying the forested buffer goal will be difficult on a bay Watershed basis. The current actual amounts of riparian areas needing buffering throughout the watershed are not known. Ensuring 70% are in a forested condition by a specified date may or may not be possible without knowing the extent of stream corridor available for buffers. I suggest including technical staff from the jurisdictions in determining which goals can be measured instead of having goals that make good sound bites.</p>	Meredith Dash, Open Water Triathlete	3/17/2014
18 Forestry Outcomes	Unknown Stream Corridor Available		Kenn Pattison	3//6/14

18 Forestry Outcomes	Conflict with Agriculture	<p>Pg9- It would appear that the goals stated on this page are also in conflict with the goal of establishing forested riparian areas on 70% of the available lands. Farmers treasure the ability to farm and therefore are not likely to put forested buffers in areas they are currently farming without some incentive. What consideration would be given for a farmer who elects to maintain a riparian grass buffer rather than a forest buffer? I wonder to what extent the riparian forest buffer goal may conflict with Pennsylvania’s Right-to-Farm laws?</p>	Kenn Pattison	3//6/14
18 Forestry Outcomes	Preserve Existing Buffers = \$0	<p>Finally, in the Forest Buffer Outcome, we support the goal, but recognize that preserving buffers is better than creating new buffers. It costs zero dollars to preserve buffers. Supporting 300 foot buffers for exceptional value freshwater waterways or equivalents, as currently exists in Pennsylvania, would slow the loss of buffers that will be occurring as we try to reach the goal of increasing forest buffers by 900 miles. There should be a no additional loss of existing buffers policy for industrial, residential or agricultural development.</p>	SOLS/LSR	3/7/2014
18 Forestry Outcomes	New Outcome	<p>add an "Interior Forest Outcome"</p>	SWQAC	3/13/2014
18 Forestry Outcomes	Urban Tree Canopy Increase	<p><u>The Final Agreement Should Include More Robust Habitat Goals:</u> The proposed outcome for expanding urban tree canopy, which can be a very important and useful attenuator for stormwater problems, is extraordinarily paltry. Washington, D.C.’s Municipal Separate Storm Sewer System (MS4) permit, covering about 12,000 acres, commits the District to annually plant 4,150 trees. The average crown coverage of that number of trees would be about 750 acres. And yet, across the entire Chesapeake Bay watershed, the proposed outcome for this Agreement is to expand urban tree canopy by 2,400 acres—over the next 11 years. At a minimum, that number should be 10,000 acres.</p>	NRDC	3/17/2014
18 Forestry Outcomes	Define Terms	<p>On the Vital Habitats page, it is hard to understand the Wetlands outcome. What does creating / reestablishing the 85,000 acres & enhance 150,000 acres mean in the big picture? Is there any way to include something similar to the Forest Buffer outcome in which the end goal is to ensure that 70% of riparian areas are forested. That is a goal the impact of which one can immediately visualize.</p> <p>**DOUBLE POST see Wetland Outcome section</p>	Rupert Rossetti	3/17/2014

18 Forestry Outcomes	Define Terms	<p>It is unclear in the Forest Buffer Outcome as to what metric is used to define when the "restore" objective has been met.</p> <p>The Tree Canopy Outcome needs to define "urban tree canopy" otherwise the Partners will not know what efforts they are committing to in this part of the Agreement.</p>	HRSD	3/17/2014
18 Forestry Outcomes	Net Forest Loss	<p>The draft agreement fails to mention an important policy that could stabilize the Chesapeake Bay Watershed’s land use. Maryland and other states have implemented a “no net loss forest” policy and this provision might be helpful in controlling the land use demand across the watershed. The Agreement could do more to emphasize the benefit of greening measures like urban tree canopies and stormwater management.</p>	Eastern Shore Land Conservancy	3/17/2014
Tree Canopy Outcome	increase number of acres	<p>Expand the urban tree canopy goal to at least 10,000 acres.</p>	Chesapeake Bay Foundation	3/17/2014
Tree Canopy Outcome	increase number of acres	<p>an outcome of 2,400 acres seems nearly meaningless. The number of acres should be dramatically increased. In urban areas this number could be expressed as a percent of land cover but policies should be improved to drive protecting and planting tree canopies in suburban areas as well.</p>	American Rivers	3/17/2014
Tree Canopy Outcome	Volunteer Efforts Make Citizens Invested	<p>In 1980, Annapolis passed a tree canopy protection law. Over time the tree canopy grew to 42.% the highest in 2006 of any urban area in the State. And it involved an aggressive tree planting program.</p> <p>The State Provides trees at little cost and businesses like to sponsor trees. Some years we planted 1000 trees. The more trees and the more people engaged in planting them the better. Why? Because now as a volunteer I am invested. As the years go by I can watch my tree grow.</p> <p>Even though the agreement was altered to increase urban tree canopy from 1,000 to 2,400 additional acres of tree canopy by 2025, this seems a very low number of acres. Given that the powerful impact of tree canopy cannot be overstated this number should be increased, considerably.</p>	Ellen Moyer, Former Mayor of Annapolis	3/17/2014
Tree Canopy Outcome	Increase Outcome		Ann's Backyard Forest, Ltd.	3/17/2014

19 Water Quality Goal	Gross Pollutants / Trash	<p>Gross pollutants are missing from this list! (page 8 Water Quality)</p> <p>Suggested: “Excess amounts of trash, nitrogen, phosphorus and sediment in the bay...” These are: cigarette butts, plastic bottles, candy wrappers, leaves, Styrofoam cups, plates, clamshells etc.</p> <p>Reasons: The smokers among us drive cars without ashtrays, smoke outside restaurants and offices and their spent butts end up in gutters and eventually in the bay. Businesses increase their bottom line by shifting disposal responsibility to their customers, some of whom let run-off bring their trash to the bay. Growth in tree canopies will drop more leaves and run-off takes them to the bay where decomposition leaches Phosphorous and Nitrogen into the bay.</p>	Hans de Bruijn Anacostia Watershed Society	3/11/2014
19 Water Quality Goal	Gross Pollutants / Trash	Programs to address littering and trash pollution should also be included in the Agreement.		3/17/2014
19 Water Quality Goal	Gross Pollutants / Trash	<p>The draft of the Chesapeake Bay Watershed Agreement, as published, does not address trash pollution, and it should. Meanwhile, research on plastic pollution in the North Atlantic Gyre is increasing. The trash is not somehow bypassing the Bay on its way from our neighborhoods and waterways to the ocean, yet almost no data exists on trash pollution in the Chesapeake Bay.</p> <p>- Trash pollution is an onramp for citizen engagement. Even citizens disconnected from local waterbodies recognize the blight caused by litter blowing down the street, or stuck in trees. In the water, it is the most visible pollutant. Talking about trash pollution, and the solutions to preventing and removing it, can engage residents watershed-wide, preparing them to become more engaged in other facets of the restoration plan.</p>	Trash Free Md Alliance	3/17/2014
19 Water Quality Goal	Stormwater	Reduce storm runoff pollution under the law enacted by the Maryland General Assembly, and work to get other states to do the same.	George and Frances Alderson	2/21/2014

19 Water Quality Goal	Wastewater Treatment	<p>... You have taken enough money from the citizens of Maryland and now we are being taxed even more. First the Chesapeake Bay Restoration fee, now the Rain Tax. Where is all this money going? We should have state of the art municipal waste water plants (and we don't). Go to any waste water plant and see the fecal matter and debris coming from the affluent and floating into the bay. We should have clean-out catch systems (catch basins) on the storm water drains and systems (we don't, we have cups and trash and all sorts of debris floating into the bay all of the time and especially after a rain). The only area that I see some concern and improvement is down on the Eastern Shore. Even down there, the sewage affluent still clouds the Bay and Coastal Waters of Ocean Pines and Ocean City. So enough of this nonsense. Get the sewage systems, storm drains, streams, and rivers cleaned and let's get moving on it. Enough time and money has been spent (and wasted) and I'm beginning to think that someone isn't doing their job!!! ...</p>	Gene Mazzilli	2/21/2014
19 Water Quality Goal	Groundwater	<p>Why doesn't the document address groundwater? Because the Consent Decree is an instrument of the Clean Water Act. The CWA only allows federal jurisdiction to 'navigable waters.' Groundwater is not navigable. Septic tank discharges into the ground are not regulated by the CWA.</p>	Dennis S.	2/4/2014
19 Water Quality Goal	Stormwater	<p>Stormwater management and pollution created through runoff have in many cases been dealt with by local government, yet this document fails to address. This is something that should be addressed in the water quality section.</p>	Nic H	3/16/2014

I have sent an extensive letter to the VA DEQ regarding a **pending permit to apply sewage sludge and “treated bio solids” to farm land around our region**. My property backs up to and connects to very large farm parcel in which Synagro is soliciting for a sludge application permit. I have had negative experiences in the past with this practice.

My concern here is not only the obvious stench and contamination possibility of my well, but also **the stream that runs across this farm land as well as my front yard and my neighbor’s front yard. We are charged by the watershed committee to properly maintain this stream and surrounding landscape**. They were very particular about this stream and even clearing of trees in proximity to this area. **I cannot imagine the watershed conservation group allowing this sewage sludge treatment to be allowed** (if known about it) or even considered. Synagro and other additional sellers, haulers and spreaders of sewage sludge have been fined by the DEQ for mismanagement and improper handling of sewage. There are more than 40 cases of reported human health, livestock, waterfowl, wild animal and environmental problems associated with this. Some have brought about extensive lawsuits to get a cease and desist ordered.

Myself and over 400+ growing Spotsylvania residents are now actively fighting the issue of pollution abatement permits and treating land with this. **EPA endorsement documents dated 1999 are not sufficient evidence for us and certainly should not be for you**. Please **consider interceding, helping and advising in this matter** and maybe adding an addendum to your draft that would keep this potential hazard from becoming a possibility in protected areas in the future.

19 Water Quality Goal	Animal Waste & Bacteria	<p>I live on the bank of the Robinson River in Madison County. Our home has a legal drain field and our septic was pumped out well before necessary. However, according to the Permit and Water Quality Information for Madison County this section of the river has bacteria impairment. There is a kennel slightly upstream that breeds and sell Chesapeake Bay retrievers. These dogs are in the river on a daily basis and kennel waste is pumped into the stream at night. It is difficult to comprehend how this business was allowed to have a permit especially because Criglersville, where it is located, is in fact a residential area. I attempted on two occasions to bring this situation before the Planning Commission and the Board of Supervisors. The first time I was told by David Jones, who was then the Chairman of the Board, that the condition of the water that flows by my own home was “none of my business.” ... The value of my home and my quality of life are adversely impacted by this. Approval of a plan that actually takes action to clean up situations like this would be very much appreciated.</p>	Bonnie Dixon	3/18/2014
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20 Water Quality Goal	Polluted Runoff	<p><u>The Final Agreement Should Address Polluted Runoff:</u> The draft Agreement fails to mention polluted runoff, let alone set outcomes for reducing it. An outcome related to reducing polluted runoff would fit either within the “Water Quality” or “Land Conservation” goals. (double post - see Land Conservation Goal)</p>	Cons Pa, Va League of Cons Voters, Potomac Cons, Va Cons Network, Potomac Riverkeeper, PennFuture, Allegheny Highlands Alliance, Rock Creek Cons, Md Cons Council, James River Assn, Nat'l Parks Cons Assn, Friends of the Rappahannock, NRCD, NWF, Ridgway Hall, SELC, Sierra Club Pa Ch., VASWCD, 70+ Individuals	3/17/2014, 3/13/2014, 3/17/2014, 3/17/2014, 3/17/2014, 3/17/14, 3/12/14
20 Water Quality Goal	Stormwater and Smart Growth	we refer you to the Choose Clean Water Principles for Stormwater and Smarter Growth, which makes the case for smart growth as a critical tool in reducing stormwater runoff.	Coalition for Smarter Growth	3/17/2014

20 Water Quality Goal	TMDL Deadlines	<p>we are concerned that the statement of timing aspects in the Water Quality goal may be detrimental to efforts to hold the Chesapeake Bay TMDL intact in ongoing litigation. The Clean Water Act (CWA) does not authorize EPA to set specific deadlines for point and non-point sources to implement the TMDL. ... in our initial comments, VAMWA recommended that the 2017 and 2025 implementation timeframes must be described as non-binding “targets” and not as binding deadlines. We are concerned that the document reads like a deadline (“by 2017” and “by 2025”) without properly characterizing these dates as “targets” consistent with EPA’s own argument. We urge the Partnership to make the “target” versus “deadline” issue clear in the agreement before it is finalized and potentially used against EPA in the pending litigation.</p>	VAMWA, MAMWA	3/17/2014
20 Water Quality Goal	Adapting Deadliens	<p>If the desired pace of implementation is unaffordable or otherwise unachievable, VAMWA believes that making timing adjustments for responsible parties is far more appropriate than taking a punitive approach against point sources as outlined in EPA’s “consequences” letter, which would likely lead to controversy and litigation.</p>	VAMWA	3/17/2014
20 Water Quality Goal	Voluntary State Approaches	<p>the document provides that signatories are not allowed to abstain with regard to matters “required by law” and related to the Water Quality Goals. VAMWA reiterates its concern that the Bay Agreement must not in any way hamper state statutory approaches, state regulatory programs that have been lawfully promulgated subject to the public safeguards of administrative process laws, or various voluntary initiatives in a given state.</p>	VAMWA, MAMWA	3/17/2014
20 Water Quality Goal	Homeowner BMP Credit	<p>In order to effectively address the greatest looming threat to the Bay - polluted stormwater runoff - we must tap the energy of the millions of people who live in the Bay watershed & provide them with meaningful opportunities to contribute to Bay restoration effort. The Partnership should include goals and outcomes related to engaging individual homeowners ... with opportunities for participating in nurtient and sediment runoff reductions ... 2/10/14 CBP final approval of Urban BMP Protocols to Credit Nutrient Reduction Associated with Installation of Homeowner BMPs. I strongly encourage the partnership to incorporate these strategies into the final agreement</p>	Congressman John Sarbanes	3/17/2014

20 Water Quality Goal	WIPs as Management Strategies	<p>Text should be added to reflect the intention to use the WIP process as the Management Strategies to meet these goals and to eliminate any ambiguities that somehow these TMDL-driven strategies are somehow subject to the ‘discretionary’ concept noted earlier.</p> <p>o “...across the region. The current nutrient and sediment Watershed Implementation Plan process will continue to be used to address these goals and outcomes.”</p>	MWashCOG	3/17/2014
20 Water Quality Goal	Echos STAC's Recommendation	<p>COG would also like to echo the Scientific and Technical Advisory Committee (STAC) comments that “numeric targets should be avoided since they suggest a definitive end point for management efforts,” when in actuality pollutant load management and ecological restoration must continue indefinitely. In this vein, the 2017 and 2025 outcomes noted under the Water Quality Goal should continue to be viewed as milestones along a long-term path towards restoration.</p>	MWashCOG	3/17/2014
20 Water Quality Goal	Revise Goal Title	<p>The outcomes are specific to the Ches Bay nutrient and sediment TMDL; the goal should be written as "Nutrient and Sediment Water Quality Goal". The goal should be written as "Achieve the water quality necessary...". Including "reduce pollutants to" is how the goal will be met rather than the goal itself.</p>	HRSD	3/17/2014
20 Water Quality Goal	TMDL & Population Growth	<p>Another important piece that may be helpful would be further illustration of how the TMDL is to be maintained with the increased population that will inevitably occur. Some type of specified growth (nutrient & sediment) offset component may be necessary to adequately address the population growth that will naturally happen.</p>	Eastern Shore Land Conservancy	3/17/2014
20 Water Quality Goal	Water Quality Outcomes	<p>CBF supports the existing outcomes in the draft Agreement and encourages the partners to ensure these outcomes are maintained in the final Agreement.</p>	Chesapeake Bay Foundation	3/17/2014
19 Water Quality Goal	Stormwater	<p>MS4 Permits must remove turf grass from the MDE and local Departments of Permitting Services list of effective stormwater management vegetation. The consequences include treating Bay friendly yards as violations and ensuring that all new developments throughout the state go in with turf grass. Ensure that every resident has the right to replace turf grass with biodiverse, chemical-free, watershed friendly vegetation (also characterized as “Rainscapes”) using the guidelines in the U.S. Fish and Wildlife Service Guide for Chesapeake Bay Watershed Native Plants and Conservation Landscaping (www.fws.gov/chesapeakebay).</p>	Alyce Ortuzar	3/15/2014

20 Water Quality Goal	Metrics for pollution rates	Develop metrics for understanding the rates of pollution from the various land uses, on a per acre basis.	David Caldwell	3/17/2014
20 Water Quality Goal	Nutrient Trading	<p>We are optimistic that the revised Bay Model will properly capture what is occurring across the landscape, in particular, in the realm of agriculture. We strongly encourage all sectors (industry, university, local, state and federal) to work collectively to establish methods for crediting voluntary best management practices to the Bay States. This also brings the issue of nutrient trading forward as a key element in need of resolution. There are potential benefits of having a formalized structure for trading between States and between sectors.</p>	PennAg	3/17/2014
20 Water Quality Goal	Remove TMDL/WIPs from Agreement	<p>In citing the Chesapeake Bay Total Maximum Daily Load (TMDL) under the water quality goal and management strategies, the draft Agreement language clearly aligns itself with EPA’s position that Section 117(g) of the Clean Water Act provides EPA the authority to enforce these goals.</p> <p>VGPA firmly believes the TMDL goes beyond the scope of the authority of the Clean Water Act and we object to including this disputed authority within the Chesapeake Bay Agreement.</p> <p>As drafted, the Agreement is not simply a commitment to a partnership between EPA and the state authority of its signatories to do good work to protect water quality in the state and the Bay. States should give serious consideration to the impact of signing this new Agreement in its current form, specifically to the wisdom of providing EPA with leverage that could allow them to dictate to the states how they must manage nutrient and sediment pollution issues. The Clean Water Act clearly specifies that states are the lead government entities, responsible for these critical programs that directly affect land use and economic activity statewide. A successful approach would allow for the flexibility necessary to let states pursue water policies in a manner and approach suitable for its unique circumstances. The Virginia Grain Producers Association does not believe it makes sense for states to simply hand over this prerogative, authority, and lead role to the EPA.</p>	Va Grain Producers	3/17/2014

20 Water Quality Goal	Expedite Innovative BMPs	<p>The goals and outcomes in the Water Quality section do not line up with Bay Program and state actions. All local governments are seeking cost effective means to reduce pollutants, however, the Bay Program has tied the hands of many local governments when it comes to utilizing innovative BMPs to achieve pollutant reductions. The Bay Program needs to expedite approval of innovative BMPs and allow TMDL credit for them, or they will not get implemented and opportunities to achieve real reductions will be lost.</p>	Chesapeake, Va	3/1/714
20 Water Quality Goal	Air Deposition	<p>There is no mention of atmospheric (air) deposition within this agreement. Since this is a large source of pollutants to the Bay, why is there no mention here or a stated goal?</p>	Chesapeake, Va	3/1/714
20 2017 WIP Outcome	More Specific	<p>My Comment: It is not clear to me how this accomplished the goal. By 2017, we put in place a plan to achieve 60% attainment, but the second goal lacks any specifics except to say that “all practices and controls necessary will be installed.” Suggest more definition to either the date such agreement is to be reached, or agreement to the percent attainment of the goal (the missing 40%) or something that puts teeth into attaining the last 40%</p>	Allan Straughan	2/13/2014
20 2017 WIP Outcome	gross pollutants	<p>Page 8 just above 2017 Suggested: “Watershed implementation plans should be amended to include interception of gross-pollutants that will not pass 1/4” openings.” This way most of the floating trash and leaf litter will be prevented from reaching the watershed</p>	Hans de Bruijn	3/11/2014
20 2017 WIP Outcome	GIT 3 Governance; Communication with Local Governments	<p>Jurisdictions should hold regular meetings of the advisory committees and workgroups associated with WIP implementation.The most costly and challenging aspect of complying with the Chesapeake Clean Water Blueprint is reducing and maintaining pollutant loadings from urban/suburban areas. The majority of this responsibility falls to local governments, many of which currently lack the technical and financial capacity to achieve and maintain the necessary pollution reductions. As a result, many local jurisdictions are pushing back against what they see as an “unfunded mandate.” In addition, many of the hundreds of stormwater permittees within the watershed, have been asking for clarity and technical assistance from EPA and the states.</p>	CBF	12/6/2013
20 2017 WIP Outcome	Nurtient Runoff	<p>Curb the nutrient pollution from agricultural and home sources, including poultry and livestock farms and the lawns at homes, golf courses and institutions.</p>	George and Frances Alderson	2/21/2014

20 2017 WIP Outcome	Devote WIP Funding to Agriculture	<p>The WIP budget of \$14.4 billion, where a mere \$928 M is allocated to agriculture that according to the CBF contributes 41% of the pollution while septic systems contribute 3% of pollution but are allocated \$3.7 billion, these allocations should be switched with ag getting a larger share of resources.</p> <p>As a 31-year agricultural machinery salesman selling tools that have reduced tillage in the bay area from five to one pass and as the founder of Big Spring Watershed Association, I have come to realize that the only way to save the bay is to put real teeth in legislation that forces states and communities to reduce NPK and designer chemicals</p>	Samuel Owings	2/10/2014
20 2017 WIP Outcome	Policy Mandates	<p>It is not clear to me how this accomplished the goal. By 2017, we put in place a plan to achieve 60% attainment, but the second goal lacks any specifics except to say that “all practices and controls necessary will be installed.” Suggest more definition to either the date such agreement is to be reached, or agreement to the percent attainment of the goal (the missing 40%) or something that puts teeth into attaining the last 40%</p>	Bill Ferris	3/3/2014
21 2025 WIP Outcome	Define Date or Percent	<p>In general the document is too broad, with too few specific commitments to have any impact on state actions. We would recommend that the state signatories be committed to a specific % of TMDL funding that they, as opposed to city, county and federal levels, will fund through 2025</p>	Allan Straughan	2/13/2014
21 2025 WIP Outcome	States Commit to TMDL Funding	<p>The 2025 WIP Outcome should be "... all practices and controls installed that are expected to achieve 100% of the nutrient and sediment pollutant load reductions necessary to meet applicable water quality standards." The Bay Partners will likely not have enough information now to know that the planned installed practices will achieve water quality standards.</p>	Lee Meadows	3/4/2014
21 2025 WIP Outcome	Planned Practices		HRSD	3/17/2014

			Conservation Pennsylvania, Choose Clean Water Coalition, Virginia League of Conservation Voters, Potomac Conservancy,	3/17/2014, 3/13/2014, 3/13/2014, 3/17/2014, 3/17/2014, 3/17/2014
22 Toxic Contaminants Goal	Toxics	The Chesapeake Bay ecosystem and its watershed can never achieve the Chesapeake Bay Program partners’ vision of a watershed with “clean water [and] abundant life” without addressing toxic contamination.	Network, Potomac Riverkeeper	
21 Toxic Contaminants Goal	Toxics	To remove the partnership’s accountability for the 2000 goals to reduce toxic contaminants, would be irresponsible. But, there is hope for the 2014 Agreement to catalyze successful toxic pollution reductions. As the Delaware Bay’s cleanup efforts are showing reductions in PCB levels, the Conservancy recommends that the 2014 Chesapeake Bay Agreement include similar implementation effort in concert with toxic outcomes and management strategies. Pennsylvania and Delaware are partners in both cleanup efforts and can appropriately facilitate the inclusion of such management strategies.	Potomac Conservancy	3/17/2014
21 Toxic Contaminants Goal	Honoring TMDLs for PCBs	Since the January 29th, 2014 draft properly includes incorporations of the Chesapeake Bay TMDL goals, the 2014 Agreement should honor the TMDLs for PCBs already in place for the tidal Potomac and Anacostia Rivers along with Baltimore Harbor and the Susquehanna River.	Potomac Conservancy	3/17/2014
21 Toxic Contaminants Goal	Toxics	The Agreement should include outcomes committing to reduce loads of polychlorinated biphenyls (PCBs) and to study the effects of “new and emerging” chemicals. We have not solved our historic problems with fish consumption advisories or in the Regions of Concern, while at the same time scientists are discovering new issues related to fish health and “new and emerging chemicals.”	Chesapeake Bay Foundation	3/17/2014

21 Toxic Contaminants Goal	Toxics / PCBs	<p>The federal government, particularly the Department of Defense, could also contribute to a management strategy focused on reducing PCBs. For example, the Environmental Protection Agency has compiled a list of facilities that have transformers containing PCBs.⁹ Within the Chesapeake Bay watershed, many of those transformers are on federal facilities.</p>	Chesapeake Bay Foundation	3/17/2014
21 Toxic Contaminants Goal	Toxics	<p>...reinstate goals for toxic pollution reduction as part of the new draft Chesapeake Bay Agreement. ...there is an issue of equity and environmental justice underlying your final decision to include toxics. Failure to do so sends a strong message to cities dealing with legacy pollutants that their problems are less important than cleaning up the Bay for the enjoyment of those with property and access</p>	Anacostia Watershed Citizens Advisory Committee	3/17/2014
21 Toxic Contaminants Goal	Adress Toxics	<p>The last agreement, signed in 2000, committed the states to eliminating toxics in the Bay. Despite mounting evidence of impacts to fish and other resources since then, this draft Agreement omits any commitment to reduce—or even research—toxic pollution in the Bay and its tributaries. The final Agreement must address toxic pollutants.</p> <p>We do not support the inclusion of toxics in the Chesapeake Bay Watershed Agreement. At this time, it is not clear which toxics are of interest to the greater good. In addition, this is an issue best suited to be handled individually, by the States. Again, if all Bay States would approach Bay Restoration from the local stream standpoint, the issue of toxics would be addressed locally. The issue of toxics is highly scientific and best if omitted for the Chesapeake Bay Agreement at this time.</p>	Center for Progressive Reform	3/17/2014
21 Toxic Contaminants Goal	Do Not Include toxics		PennAg	3/17/2014
21 Toxic Contaminants Goal	Toxics Goal and Monitoring Outcome	<p>include the following in the 2014 CBP agreement:</p> <p>☐ Goal- Toxics: The effects of thousands of chemicals and the mixtures of those chemicals in our waterways are some of the least understood influences on the Chesapeake Bay and its watershed tributaries. The addition of known eco-toxins and endocrine disrupting chemicals to our waterways makes it necessary to increase research and re-emphasize the goal of the Clean Water Act to reduce these chemicals. Our goal is to improve knowledge of the effects of toxic contaminants on the health of fish, wildlife and the public by 2015 so strategies can be determined to reduce loadings of PCBs,</p>	Clean Water Action	3/17/2014

21	Toxic Contaminants Goal	Revise WQ Goal	<p>We recommend the Bay Program modify the existing water quality goal to read as follows: Reduce pollutants, including nitrogen, phosphorus, sediment, and toxics to achieve the water quality necessary to support the aquatic living resources of the Bay and its tributaries and protect human health.</p> <p>An additional outcome for this goal should include the following: By 2017, all partner jurisdictions include existing toxic remediation plans, TMDL implementation strategies and related programs to abate impacts from toxic contamination in the updated Watershed Implementation Plans.</p>	Chesapeake Bay Trust	3/17/2014
22	Toxic Contaminants Research Outcome	Include outcome	<p>We urge you to put the following back into the Agreement under the Water Quality goal:</p> <p>- Toxic Contaminants Research Outcome: By 2015, assess ongoing research and develop an agenda for new research, if needed, to improve knowledge of the effects of contaminants</p>	Anacostia Watershed Society	3/17/2014
22	Toxic Contaminants Research Outcome	Evaluation	<p>An in-depth evaluation of toxic and hazardous materials, and their control, must be addressed in the agreement.</p>	Gregory Moser	2/3/2014
22	Toxic Contaminants Research Outcome	New Goal	<p>Goal- Toxics: The effects of thousands of chemicals and the mixtures of those chemicals in our waterways are some of the least understood influences on the Chesapeake Bay and its watershed tributaries. The addition of known eco-toxins and endocrine disrupting chemicals to our waterways makes it necessary to increase research and re-emphasize the goal of the Clean Water Act to reduce these chemicals. Our goal is to improve knowledge of the effects of toxic contaminants on the health of fish, wildlife and the public by 2015 so strategies can be determined to reduce loadings of PCBs, PAH's, pesticides, pharmaceuticals and mercury in order to return water to the ecosystem that has the least amount of chemicals of any kind, and has no toxic or bio-accumulative impact on living resources or on human health.</p> <p>Salting/treatment of county and state roads for snow and ice . These chemicals and salt go directly into the Bay. Do we know the effects these have on the Bay? It cannot be natural or healthy? After recent snows (Jan 2014) a thin layer and an occasional pile of salt/chems have been lying on the shoulders of Rt 33. Could we have a method of "street cleaning/recovering" these salts? Should we be using salts/chems at all and is the practice counter to encouraging a healthy bay?</p>	Ruth Berlin, Md Pesticide Network	3/10/2014
22	Toxic Contaminants Research Outcome	Toxics Research - Salted Roads		Michael Keene	2/3/2014

				Conservation Pennsylvania, Choose Clean Water Coalition, Virginia League of Conservation Voters, Potomac Conservancy, 3/17/2014, Virginia 3/13/2014, Conservation 3/13/2014, Network, 3/17/2014, Potomac 3/17/2014, Riverkeeper 3/17/2014
Toxic Contaminants Research 23 Outcome	Toxics research	This outcome should be added to the Water Quality Goal: Toxic Contaminants Research Outcome: By 2015, assess ongoingresearch and develop an agenda for new research, if needed, to improve knowledge of the effects of contaminants of emerging concern on the health of fish and wildlife so future strategies can be considered.		
Toxic Contaminants Research 23 Outcome	Toxics research	We urge the Bay Program Partners to reconsider and adopt the following proposed language in the Chesapeake Bay Watershed Agreement, which would insure that a much needed assessment would take place and provide the basis for further recommendations to address toxics in the Bay: Toxic Contaminants Research Outcome: Assess planned research and opportunities for new research to improve knowledge of the effects of contaminants of emerging concern on the health of fish and	Md Environmental Health Network	3/17/2014
Toxic Contaminants Reduction 23 Outcome	Include Goal	<i>Clarifying expectations and roles of the various jurisdictions in the new Agreement, should not preclude the development of, and commitment to, strong goals and outcomes. For example, the current omission of any outcome for toxic contaminants, nor mention or consideration of climate change in the draft agreement, is incredibly short-sighted and quite frankly, an embarrassment , for what is considered to be the “premier” restoration program in the country. Ensure the new Chesapeake Bay Agreement includes goals specific to toxic contaminants and climate change.</i> <i>* DOUBLE POST see Climate Change section</i>	CBF	12/6/2013
Toxic Contaminants Reduction 23 Outcome	Include Research & Reduction Outcomes; Known Risks Outreach	The Bay Program must agree to include an outcome for researching toxic contaminants, and reducing their existence in our rivers and streams . The Bay Program should be held accountable with an outcome for toxic contaminants to, at the very least, commit to further research of the impacts and to make sure people know the details of risks associated with local fish consumption	Mary Boehm	1/29/2014

		<p>A strong program to continue progress on cleaning up the bay is very important to me. My family is from the Eastern Shore of Maryland and Virginia and the bay is an important part of my heritage. There are many things in this plan that I support, but I was disappointed not to see any mention of cleaning up chemical contaminants . This is important for the health of the bay and the health of anyone who eats fish or shellfish from the bay. I would like to see a commitment to reducing chemical contamination of the bay put into the agreement</p>		
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>Steven Smith</p>	<p>1/30/2014</p>
		<p>This article about not enforcing the toxins agreement in the counties that surround the bay is devastating . As someone who has swam, gone boating, played on the beaches, and even participated on learning trips of how the bay is changing, it is imperative to keep this agreement to protect the bay and watershed! ... I'd hate to think that after all the hard work and much improved conditions of the watershed that has occurred over the last decade or so be undone because boards aren't looking into what neighboring counties are facing that affect the water and ultimately every other county as well</p>		
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>Courtney</p>	<p>1/30/2014</p>
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>Brenda Carroll</p>	<p>1/30/2014</p>
		<p>It is deplorable that eliminating toxins from the Chesapeake Bay is not included in Watershed Agreement. I suggest this be rectified immediately.</p> <p>The 21st century will be remembered for it's ecology reform. The sooner we begin, the better for our children and grandchildren. Our large fresh water sources must be remediated of toxic point source emitters. Especially military waste that has been dumped and shot into the water for weapon practice. For instance the large algae bloom of the Potomac River... downstream of a chemical weapons dump. Oh, you didn't know that? Of course, the military is not in the business of cleaning or even admitting it disposed of the now toxic waste. It's defense. So how will we meet the military waste challenge?</p>		
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Military Waste</p>	<p>Joel Becker</p>	<p>1/30/2014</p>
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>Tom Coleman</p>	<p>1/30/2014</p>
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>Matt Shultz</p>	<p>1/31/2014</p>
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>Sara Painter</p>	<p>1/31/2014</p>
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>"K"</p>	<p>1/31/2014</p>
		<p>Please restore the commitment to keeping toxics out of the Chesapeake Bay. It's important to state that because otherwise, companies, farms and citizens will take absence of directive as a license to dump and not worry</p>		

			Traditionally, reducing toxics also has been a commitment. And the Chesapeake Bay Program readily acknowledges toxic contaminants are a major problem in the Bay . “Almost three-quarters of the Chesapeake Bay’s tidal waters are considered impaired by chemical contaminants. These contaminants include pesticides, pharmaceuticals, metals and more, and can harm the health of both humans and wildlife.” P lease put a commitment to reduce toxics back in!		
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	David Graybill	1/31/2014
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	Tim Elder	2/1/2014
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	Jerry O'Connor	2/1/2014
			What about toxic chemicals?		
			Get the toxic chemicals out of the bay!		
			The Chesapeake Bay is a national treasure beyond the 6 bordering states. I love to kayak there. While the Blueprint for the newest version of the Chesapeake Bay Watershed Agreement deals specifically with reducing nitrogen, phosphorus, and sediment to the Bay and its tributaries, I just read that it has eliminated specific reference to toxic industrial chemicals and agricultural run-off (contaminants that include pesticides, pharmaceuticals, metals, etc). These are very serious pollutions that can harm the health of humans and wildlife and we must do better than the draft agreement states. I hope fervently that you will re-write the agreement to include all of the serious threats to the quality of the Chesapeake Bay ecosystem. Thank you for accepting public comments on this very important issue.		
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	Rita Varley	2/3/2014
			The removal of environmental toxins should be part of the agreement. Past industrial policies used our rivers/streams and the bay as dumping grounds i.e. dioxin. There are also numerous communities that get their water supplies from our rivers i.e. Washington D.C. from the Potomac, and no water plants currently take out medication residues.		
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	Jim Crable	2/18/2014
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	Chris Taneyhill	2/4/2014
23	Outcome	Toxic Contaminants Reduction	Unnecessary	Dennis S.	2/4/2014
			Remember, we’re all downstream from someone; even those on the highest hilltops get pollution from rainwater i.e. acid rain and mercury contamination.		
			Toxic contaminants must be addressed is this agreement. The state of the Chesapeake Bay is not determined by just the common, visible pollutants.		
			Toxic discharges are already illegal and municipal and industrial treatment plants have discharge limits on them that are set by the state. It’s probably not necessary to address toxic releases from point sources in this agreement.		

23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants</i></p>	<p><i>It concerns me that toxins are not addressed in the watershed agreement public report that was recently released. While at Christopher Newport University, I have seen evidence that suggests toxins do have significant impacts on aquatic species and this can be carried on to humans . Also, most policies are voluntary. Is there any way that more can be required by gaining support from local and federal regulations?</i></p> <p><i>An outcome of the Bay Program should be the reduction of toxic contaminants in the Chesapeake Bay!!</i></p> <p><i>My husband and son both fish in the bay and Severn River. We are shocked to discover that we are eating fish containing toxic chemicals! This should be a top priority!!</i></p>	<p><i>Justin Weiser</i></p>	<p><i>2/5/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants</i></p>	<p><i>the elimination of toxins has to be a part of this program.</i></p>	<p><i>Margie Taneyhill</i></p>	<p><i>2/6/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants</i></p>	<p><i>The Chesapeake is one of the treasures of America. Don't let it go the way of Delaware Bay or Lake Erie. Elimination of toxins and runoff of all kinds, efforts to clean up the existing waters and instituting policies that cover all the surrounding counties in the Chesapeake watershed are essential, as are efforts at cooperation with Pennsylvania and Virginia on runoff and pollution policies, that they might hopefully do their part.</i></p>	<p><i>David Conlon</i></p>	<p><i>2/12/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants</i></p>	<p><i>We are a part of the larger ecosystem which includes the Bay. We are only hurting and poisoning ourselves when we allow pollution in the Bay. This is common sense. My heart breaks everytime I think of how hard it is to convince and enforce people to do the right thing by the Bay.</i></p>	<p><i>Severn Savage</i></p>	<p><i>2/13/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants</i></p>		<p><i>Kristin G. Cook</i></p>	<p><i>2/19/2014</i></p>

23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	<p>The water quality of the Bay is very important to me since I like kayaking, swimming and boating. I am also a small organic farmer within the Critical Bay area who cannot sell any of my high quality produce because of the excessively zealous Nutrient Management law.</p> <p>The foundation of organic farming is high humus and organic matter of the soil. Such soil will hold water and nutrients many times better than conventional, synthetic chemical based agricultural soils. Yet the fees associated with tissue sampling, manure analysis and soil analysis can take up to 10% annually out of gross sales of a small farmer .</p> <p>According to the law, if I sell more than 2500\$ worth of produce, then every time I spread my horse manure under my 5 different types of fruit trees, I need an analysis of the manure and the 5 different types of trees. At the same time the big farmer down the street is mono cropping , spreading Roundup etc that kills soil microbes, depletes organic matter, causes erosion and chelates trace minerals while drawing government subsidies is only required to take one or two soil samples which is a miniscule percentage of his income. First and foremost you need to address the damage that synthetic chemical based agriculture is doing to our watershed, our air and our health before you go after the small guys. Be realistic, be fair. **DOUBLE POST see Agriculture section</p>	Outi Denny	2/19/2014
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	<p>Unfortunately, I noticed there isn't a mention of toxic chemicals in the draft Agreement. There is a 2010 Restoration Executive Order mandating the Chesapeake Bay Program establish toxic contaminant reduction goals. It's becoming common public knowledge that chemicals, including pesticides, are linked to inter-sex fish, bee hive deaths; increased rates of asthma, cancer, neurological and developmental impacts; autism; Parkinson's disease; and other long-term / life-threatening public health outcomes—I trust this was an oversight. Thank you</p>	Gina Navarro	3/4/2014
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	<p>Toxic contaminants should be included in the Chesapeake Bay Watershed Agreement. To exclude toxic contaminants makes a joke of this entire process . Shame on each and every one of you who has bowed to industry and its highly paid experts, and agreed to sacrifice our precious waterways to toxic polluters! I can tell you that for the tidal Patapsco, as well as other Bay tributaries that bear the greatest burdens from legacy and ongoing toxic contamination, the TMDLs (and their formulation/enforcement by MDE) will not be sufficient to restore and maintain water quality in a manner that is safe for both aquatic life and human contact.</p>	Rebecca Kolberg	3/4/2014

23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants - Add a Goal</p>	<p>There should be specific goals and outcomes for toxic substances</p>	<p>Stuart Stainman</p>	<p>3/4/2014</p>
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>Toxic contaminants are clearly being measured and discovered and are known to be important for human health and health of fisheries; so, specific goals need to address these</p>	<p>John B Reeves</p>	<p>3/6/2014</p>
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p> <i>I am very concerned about the exclusion i n the 2014 Chesapeake Bay Program (CBP) Agreement of toxic reduction goals , particularly at this time when toxic chemicals are linked to intersex fish, hermaphroditism in amphibians, alarming rates of bee hive deaths and a growing body of research linking toxic contaminants to increased rates of asthma, neurological and developmental impacts, cancer, autism and Parkinson's disease plus other long-term and even life-threatening impacts. Recent research links systemic neonicotinoid pesticides, already linked to bee hive deaths, to brain damage in children and adverse impacts on crabs.</i> <i>The 2012 federal report Toxic Contaminants in the Chesapeake Bay and its Watershed found that current state programs and local toxic maximum daily load (TMDL) standards inadequately address the serious and pervasive contaminant data gaps.</i> <i>We urge the CBP to fully implement the 2010 Chesapeake Bay Protection and Restoration Executive Order 13508 mandate to establish toxic contaminant reduction goals. Toxic contaminants of concern include PCBs, PAHs, pesticides, mercury, pharmaceuticals and endocrine disruptors . To minimize the importance of a clear and aggressive strategy for toxics as a priority in the Bay Agreement is to ignore the health and environmental threats that continue to escalate. I urge you to carry out the mandate of the Executive Order, respond to the 2012 report, and incorporate clear and specific strategies and toxic chemical reduction goals into the Agreement.</i> <i>This agreement is also an opportunity to correct the absurd qualification of “reducing the input of all controllable sources” of contaminants. Since virtually all contaminants can be traced back to human activities, then all pollution is controllable. The question is do we have the will to exert that control?</i> </p>	<p>Md Pesticide Network - <u>130 Constituents</u></p>	<p>3/4/2014</p>
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>that control?</p>	<p>Patrick Torborg</p>	<p>3/9/2014</p>
23	<p>Toxic Contaminants Reduction Outcome</p>	<p>Reduce Toxic Contaminants</p>	<p>The agreement should be modified to include goals specific to toxic contaminants and climate change. **DOUBLE POST see Climate Change section</p>	<p>Joseph Valentine</p>	<p>3/10/2014</p>

		As a coalition of public health, health care providers, consumer and environmental organizations we are deeply disturbed by the exclusion in the 2014 Chesapeake Bay Program (CBP) Watershed Agreement of toxic reduction goals , when a steadily growing body of research links these toxic chemicals to intersex fish, fish kills, hermaphroditism in amphibians, alarming rates of bee hive deaths and public health impacts including increased rates of asthma, autism, birth defects, cancer, ADHD, depression, obesity, neurological, reproductive and developmental impacts, Parkinson’s disease, Alzheimer’s, reduced IQ and more. Recent research links systemic neonicotinoid pesticides, already linked to bee hive deaths, to brain damage in children and adverse impacts on blue crabs.	Ruth Berlin, Md Pesticide Network	3/10/2014	
23	Toxic Contaminants Reduction Outcome	Reduce Toxic Contaminants	<p>Current state programs and local toxic maximum daily load (TMDL) standards inadequately address the serious and pervasive contaminant data gaps identified in the 2012 federal report - Toxic Contaminants in the Chesapeake Bay and its Watershed: Extent and Severity of Occurrence and Potential Biological Effects (“Toxic Contaminants Report”). While data is available to take action now and establish best management practices (BMPs) to stop ongoing Bay contamination, the Executive Council must adopt measures to ensure over time and on an ongoing basis that the BMPs are adequately protective. This requires: Rigorous ongoing data collection of toxic compounds in the Bay Adopting new reduction measures for toxic runoff from the full range of use patterns, and Strategies for addressing interstate contamination.</p>	Ruth Berlin, Md Pesticide Network	3/10/2014
23	Toxic Contaminants Reduction Outcome	Reduce Toxic Contaminants	<p>Monitoring Outcome: Jurisdictions will address toxic contaminant data gaps as outlined in the 2012 Toxic Contaminants in the Chesapeake Bay and its Watershed: Extent and Severity of Occurrence and Potential Biological Effects Report; Jurisdictions will increase their own monitoring of the toxics identified in the Toxic Contaminants Report, and their cooperation with federal agencies currently working to improve our understanding of toxics and potential toxics in order to identify and implement strategies for reducing occurrence and impact of toxic contaminants in the Chesapeake Bay.</p>	Ruth Berlin, Md Pesticide Network	3/10/2014
23	Toxic Contaminants Reduction Outcome	Monitoring Outcome			

23	Outcome	Toxic Contaminants Reduction	Reduction Goal	<p>Goal- Toxics: The effects of thousands of chemicals and the mixtures of those chemicals in our waterways are some of the least understood influences on the Chesapeake Bay and its watershed tributaries. The addition of known eco-toxins and endocrine disrupting chemicals to our waterways makes it necessary to increase research and re-emphasize the goal of the Clean Water Act to reduce these chemicals. Our goal is to return water to the ecosystem that has the least amount of chemicals of any kind, and has no toxic or bio-accumulative impact on living resources or on human health.</p> <p>Monitoring Outcome : Jurisdictions will increase their own monitoring of toxics, and their cooperation with federal agencies currently working to improve our understanding of toxics and potential toxics. An immediate focus on endocrine disruptors, including pesticides and hormones from agricultural operations, will be a priority.</p> <p>Pre-Treatment Outcome : The jurisdictions will increase their efforts to assist in wastewater treatment plant and industrial pre-treatment programs, including broadening programs to reduce all chemicals that have not yet been evaluated for harmful effects to wildlife, including endocrine disruption.</p>	SOLS/LSR	3/7/2014
23	Outcome	Toxic Contaminants Reduction	Monitoring Outcome	<p>Pre-Treatment Outcome : The jurisdictions will increase their efforts to assist in wastewater treatment plant and industrial pre-treatment programs, including broadening programs to reduce all chemicals that have not yet been evaluated for harmful effects to wildlife, including endocrine disruption.</p>	SOLS/LSR	3/7/2014
23	Outcome	Toxic Contaminants Reduction	Pre-Treatment Outcome	<p>I have always believed it was a bad idea to allow folks living near the bay to put turf chemicals with these lawn companies on. We live in Owings, and behind me is a wetland - my next door neighbor can put chemicals on his lawn - they will make their way to the bay.</p> <p>I do not use chemicals for termites that go into the ground - I pay out of my own pocket for Sentricon system. \$300 per year. I get no tax help for keeping my little part of the world a better place</p>	SOLS/LSR	3/7/2014
23	Outcome	Toxic Contaminants Reduction	Turf Chemicals	<p>Please keep eliminating the toxins in the Chesapeake Bay a priority. I grew up swimming, skiing, fishing, crabbing, boating & just enjoying the Bay & its beauty. I want my grandchildren & their grandchildren to do the same. Last summer I watched a family of ducks & horseshoe crabs under the Eastport bridge in slimy water with a shore full of trash, bottles, even a baby shoe & all kinds of gunk in the water. So much good has been done thus far please continue. We must continue to get the toxins out of the Bay. We need to continue & make even stronger our program to clean up the Bay.</p>	Kathryn Bowlin	3/12/2014
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants	<p>Limiting “pollutants” to Nitrogen, Phosphorous, and sediment ignores the equally important issue of toxics. The proposal of new Natural Gas liquefaction and export facilities along the Bay should also be evaluated in terms of potential impacts on water quality.</p>	Laurie Long	3/12/2014
23	Outcome	Toxic Contaminants Reduction	Reduce Toxic Contaminants		Bernice O'Brien	3/14/2014

23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants - Salted Roads</i></p>	<p><i>I don't see anything in the Draft Agreement about controlling or reducing the level of solid and liquid chemical contaminants used for snow and ice removal on roadways—sodium chloride, calcium chloride, magnesium chloride and other agents—all which ultimately find their way into our streams, rivers and the Chesapeake Bay with devastating effect. Numerous scientific studies show that as a direct and proximate result of State Highway/Transportation Departments' environmentally disastrous snow and ice removal practices and procedures, salt levels are rising with lethal effect on aquatic species and ultimately marine life, not to mention human life. In this regard, the Draft Watershed Agreement appears to be completely deficient.</i></p>	<p><i>David L. Konick, Hal Hunter, Anthony Lavato, Holly Glenn, Deverell Pedersen: Submitted Individually</i></p>	<p><i>3/15/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants - Salted Roads</i></p>	<p><i>In Rappahannock County, Virginia we are aware that our rivers are headwaters for the Bay. We are astounded and appalled that our very own VDOT is poisoning our rivers with chemicals for snow removal as opposed to using sand. Apparently VDOT is above criticism for political reasons I do not understand. Please begin there—do whatever it takes to stop VDOT from strewing toxic chemicals on our roads and is ruining our rivers</i></p>	<p><i>Sandra S. Cartwright-Brown</i></p>	<p><i>3/15/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants</i></p>	<p><i>The need for addressing toxic contamination is important to the longevity of this document. There has been great efforts and investments made to the Chesapeake Bay to reduce the contamination over the past several decades</i></p> <p><i>... at every tap, well head, spring, reservoir, aquifer - DANGER: DO NOT DRINK. WATER IS POISONOUS.</i></p> <p><i>at every stream, creek, river, lake, bay, sea and ocean - DANGER: DO NOT TOUCH. DO NOT SWIM. WATER IS DISEASED.</i></p>	<p><i>Nic H</i></p>	<p><i>3/16/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants - Post Warning Signs</i></p>	<p><i>at every shoreline, dock, pier, bridge, and vessel - DANGER: DO NOT EAT FISH, CRABS, OYSTERS – WATER IS TOXIC....</i></p> <p><i>So sad and truly tragic that massive applications of chemicals/salts on roads will now cause even MORE pollutants and damage to the Bay and other natural water habitats.</i></p>	<p><i>Carmen Skarlupka</i></p>	<p><i>3/17/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants - Salted Roads</i></p>	<p><i>Please limit the amount of ice melting pollutants in an effort to halt further MAN MADE pollution of our natural waterways</i></p>	<p><i>K. Christie</i></p>	<p><i>3/17/2014</i></p>

		<p><i>I personally recommend that EPA and the CBWA provide for studies of the practice of using salts and chemicals on winter roads for de-icing purposes.</i></p> <p><i>We have become aware that beet juice is being tested in jurisdictions as an alternative, and perhaps superior, method of treating roads.</i></p> <p><i>The CBWA should provide for monitoring of chemicals applied by VDOT and other state and federal road maintenance operatives as they significantly affect water sheds and the Bay. Runoff is usually rapid and strong, spreading chemicals through the waterways and deep into the Bay.</i></p> <p><i>I strongly encourage EPA and CBA to add specific language to the Chesapeake Bay Watershed Agreement to monitor salts and chemicals added to roadways and provide the potential for incentives for the use of more benign alternatives.</i></p> <p><i>Every portion of Section (i), (ii), (iii) and (iv) of the EPA CBW Office mandate easily applies to studies of highway chemical runoff, development of programs to reduce the issue, implementing science and modeling, coordinating with federal, state and local officials to implement same to improve the quality of the Chesapeake Bay and obtaining the support of officials and government agencies and authorities to achieve the objective.</i></p>			
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants - Salted Roads</i></p>		<p><i>Rick Kohler</i></p>	<p><i>3/17/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants</i></p>	<p><i>Toxic chemicals are a major contributor to the problems that the Bay faces. Omitting this important topic overlooks the severity of the problem</i></p>	<p><i>Chad</i></p>	<p><i>3/17/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants - Salted Roads</i></p>	<p><i>Too much salt on the road, too much salt in the rivers. We are smart enough to find safe alternatives for treating our roads to ensure the health of our watershed for ourselves and our children. Can't we try to do the right thing once?</i></p> <p><i>Current independent data identifies the current State Highway/Transportation Department's snow and ice removal procedures are environmentally disastrous; affecting our streams, rivers, and the Chesapeake Bay with horrific results. Why has the committee neglected to address the necessity to reduce the level of solid and liquid contaminants used for ice and snow removal on roads?</i></p> <p><i>Please take the time to reconsider as the current Draft Watershed Agreement is inadequate until it addresses this most urgent issue.</i></p>	<p><i>Laura Booth</i></p>	<p><i>3/17/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants - Salted Roads</i></p>		<p><i>Terri Freeborn</i></p>	<p><i>3/17/2014</i></p>
23	<p><i>Toxic Contaminants Reduction Outcome</i></p>	<p><i>Reduce Toxic Contaminants</i></p>	<p><i>Please add to your list of goals a commitment to reduce toxic pollution in Chesapeake Bay (and its tributaries), as well as what you propose must be done to accomplish that.</i></p>	<p><i>Christine M Robinson, JMU</i></p>	<p><i>3/18/2014</i></p>

23	Toxic Contaminants Reduction Outcome	Reduce Toxic Contaminants	<p><i>It is time to prevent toxic contaminants from ending up in the Chesapeake Bay. I urge the Chesapeake Bay Program to revise its Agreement and establish toxic contaminant reduction goals. The science is indisputable that something must be done to protect this bay. There is no need for further study!</i></p> <p>Setting definite goals on controlling chemical poisons in Chesapeake Bay must be a part of the agreement between Chesapeake Bay states & the federal government, if the Bay is to be restored. Unregulated chemical poisons mindlessly poured by the tons into our world cause intersex fish, hermaphroditism in amphibians, birds with thinned eggshells, poisoned crabs, & ever-increasing human cancer, autism, Parkinson's disease, etc., etc.</p> <p>The 2012 federal report Toxic Contaminants in the Chesapeake Bay & its Watershed found state programs & state-level toxics maximum daily load (TMDL) standards do not address serious pervasive contaminant data gaps. 72% of the Bay's tidal-water segments are now poisoned by introduced PCBs, PAHs, pesticides, mercury, pharmaceuticals, & endocrine disruptors.</p> <p>The Chesapeake Bay Program has simply ignored its duty under the Clean Water Act, & Executive Order 13508, to address these threats to water quality & ecosystems it was created to protect. The Chesapeake Bay Program may now either revise its Agreement, establishing toxic contaminant reduction goals, & meaningfully enforcing them, or not.</p> <p>I write as an emeritus member of the American Institute of Biological Sciences (AIBS).</p>	Jean Newcomb	3/18/2014
	Toxic Contaminants Reduction Outcome	Reduce Toxic Contaminants - Goal	<p><i>The Draft Agreement fails to address the need to control or reduce the level of solid and liquid chemical contaminants used for snow and ice removal on our roadways. Contaminants such as sodium chloride, calcium chloride, magnesium chloride and other substances ultimately end up in our streams, rivers and the Chesapeake Bay. Studies have shown that State Highway and Transportation Departments snow and ice policies result in rising salt levels in our waters, which in turn has a devastating effect on our aquatic species and marine life.</i></p> <p><i>Please consider addressing this issue in the Draft Watershed Agreement. I understand that beet juice has been used in some areas to great affect.</i></p>	Gerrit Crouse	3/18/2014
23	Toxic Contaminants Reduction Outcome	Reduce Toxic Contaminants - Salted Roads	<p><i>Please consider addressing this issue in the Draft Watershed Agreement. I understand that beet juice has been used in some areas to great affect.</i></p>	Elizabeth Johns	3/18/2014

I would please ask that some of you making the decisions please go and look at a few bridges in any area of Virginia and see the mounds of salt still there from the last snows... as it now rains (and some ice where even more salt is being laid down) it is all going straight to the Bay.

THIS CANNOT BE GOOD.

*There are alternatives such as **beet juice** that works even better than salt... Just asking that someone bring this up as it just cannot be good for the Bay.*

Research & Reduce I honestly cannot imagine the millions of tons of salt that dump into our waters every time there is a

Toxic Contaminants - slick spot on the road and salt kills trees too!!

Salted Roads

*Toxic Contaminants Reduction
23 Outcome*

Deirdre Payne

3/18/2014

Research & Reduce
Toxic Contaminants -
Salted Roads

The Final Agreement Must Incorporate Outcomes Related to Toxic Pollutants: A September draft of the Agreement included two provisions to address these toxic issues, but they were removed. These outcomes should be added to the Water Quality goal.

Toxic Contaminants Reduction Outcome: By 2015, identify existing practices and propose an implementation schedule for new practices, if necessary, to reduce loadings of PCBs and mercury to the Chesapeake Bay and its watershed.

Toxic Contaminants Research Outcome: By 2015, assess ongoing research and develop an agenda for new research, if needed, to improve knowledge of the effects of contaminants of emerging concern on the health of fish and wildlife so future strategies can be considered.

These provisions are reasonable, narrowly tailored, and strategic.

Cons Pa CCWC,
Va League of
Cons Voters,
Potomac
Conservancy, Va
Cons Network,
Potomac
Riverkeeper,
PennFuture,
Allegheny
Highlands
Alliance, Rock
Creek Cons, Md
Cons Council,
James River Assn,
Nat'l Parks Cons
Assn, Friends of 3/17/2014,
the 3/13/2014,
Rappahannock, 3/13/2014,
NRDC, NWF, 3/17/2014,
Ridgway Hall, 3/17/2014,
SELC, Sierra Club 3/17/2014,
Pa Ch., 70+ 3/17/2014,
Individuals 3/12/14

<p>Toxic Contaminants Reduction 24 Outcome</p>	<p>Research and Reduce Toxic Contaminants</p>	<p>The Elk River chemical leak and ensuing water crisis brings in sharp focus the threat of toxic chemicals to our region’s waterways, our health and our economy. A meaningful Bay Watershed Agreement must address the reduction of loadings of toxic pollutants. It must also prioritize research of toxic contaminants on aquatic and human health.</p> <p>Our state is learning from this experience the incalculable value of clean water. It will take a long time to restore the public trust in government to adequately protect us and the water we drink and enjoy from harm. We have an immense hole to dig out of to redeem our state’s image as a safe place to live and visit. We do not wish these consequences on any of the Bay watershed states.</p> <p>We urge the Board to address the threat of toxic contaminants in the Agreement. We advise the Board to take every step possible to respond to citizens’ insistence, as represented loudly and strongly in West Virginia, that accountability measures are in place to produce real improvement and results that ensure our right to clean water now and in the future.</p>	<p>West Virginia Rivers Coalition</p>	<p>3/17/2014</p>
<p>Toxic Contaminants Reduction 24 Outcome</p>	<p>Reduce Toxic Contaminants - Goal</p>	<p>Setting defined goals on reducing toxic contaminants in the Chesapeake Bay must be a part of the agreement between Chesapeake Bay states and the federal government if any real progress is to be made concerning Chesapeake Bay restoration. At this time when toxic chemicals are linked to intersex fish, hermaphroditism in amphibians, birds with thinning eggshells, adverse impacts on crabs, and a growing number of human health impacts like, cancer, autism and Parkinson's disease, the time to act is now. the Chesapeake Bay Program cannot ignore its duty under the Clean Water Act and Executive Order 13508 to address these threats to the water quality and the ecosystems it aspires to improve and protect. Now is the time to act on toxic contaminants. We urge the Chesapeake Bay Program to revise its Agreement and establish toxic contaminant reduction goals.</p>	<p>170 Constituents Submitted Individually from Va, Md, Pa, NY, De, WV, & D.C.</p>	
<p>Toxic Contaminants Reduction 24 Outcome</p>	<p>Research and Reduce Toxic Contaminants</p>	<p><i>A modern Bay agreement must include a toxics outcome. We believe it would be appropriate for future strategies to focus on reduction of persistent bio-accumulative and toxic (PBT) contaminants and non-PBT contaminants that affect the ecosystem and human health . Strategies should also improve our knowledge of the effects of contaminants of emerging concern on human health and the health of fish and wildlife.</i></p>	<p>Alliance for the Chesapeake Bay</p>	<p>3/17/2014</p>
<p>Toxic Contaminants Reduction 24 Outcome</p>	<p>Research and Reduce Toxic Contaminants</p>	<p><i>We strongly recommend that language be included in the final agreement that will commit the cbp to research and develop policies to address both known threats, such as mercury and PSCs, as well as emerging contaminants, such as endocrine disruptors.</i></p>	<p>Susquehanna Greenway</p>	<p>3/17/2014</p>

<i>Toxic Contaminants Reduction</i> 24 <i>Outcome</i>	Reinstate Goals and Outcomes	our bay will not be safe for swimming & fishing until toxic contaminants are addressed. ... causing abnormalities in reproductive system of fish & leading to fish kills & beach closures throughout the watershed. CBP has a long history of commitment to reducing toxic contaminants dating back to 1976. Both the 1987 and 2000 agreements contain goals and objectives related to toxic contamination. Yet the current draft fails to address toxic contamination as part of its WQ goals & outcomes. I strongly encourage the Partnership to reinstate its commitment to addressing this pervasive issue in the final agreement.	Congressman John Sarbanes	3/17/2014
<i>Toxic Contaminants Reduction</i> 24 <i>Outcome</i>	Reduce Toxic Contaminants	The Goals and Outcomes related to Toxic Pollutants, which were included in the 2000 Agreement and also in the September 2013 draft, have been removed. Aside from the reports of intersex fish in the Potomac and Susquehanna, the growing concern about emerging contaminants makes it unconscionable not to address toxics in the new Agreement.	Rupert Rossetti	3/17/2014
<i>Toxic Contaminants Reduction</i> 24 <i>Outcome</i>	Reduce Toxic Contaminants	The issue of toxics should permeate the Bay Cleanup effort. From fish consumption advisories, to endocrine disrupters, to atrazine in drinking water, this issue is of deep concern to me as a father and as a Riverkeeper.	Midshore Riverkeeper Conservancy	3/17/2014
<i>Toxic Contaminants Reduction</i> 23 <i>Outcome</i>	<i>Include outcome</i>	We urge you to put the following back into the Agreement under the Water Quality goal: - Toxic Contaminants Reduction Outcome: By 2015, identify existing practices and propose an implementation schedule for new practices, if necessary, to reduce loadings of PCBs [and other priority contaminants identified by the Partnership] to the Chesapeake Bay and its watershed.	Anacostia Watershed Society	3/17/2014

<i>Toxic Contaminants Reduction</i> 23 <i>Outcome</i>	Reduce Toxic Contaminants	<p>Chemical contaminants are a very important issue that shouldn't be forgotten. The Virginia's tributaries rank the second worst in the nation when measured by the amount of contaminants discharged into them (Sachs, 2013). Although the Bay's main pollution is because of nitrogen, phosphorus and sediment, chemical contamination must be taken into account or else it will turn into a bigger problem in the future. For all the issues listed, specific goals must be included. Fires affect directly the quality of the water, either by increasing runoff or by discharging retardants and foams into the water. This issue has not been addressed in the agreement.</p>	Tatiana Marquez	3/1/714
<i>Toxic Contaminants Reduction</i> 23 <i>Outcome</i>	Reduce Toxic Contaminants	<p>The removal of the Goals and Outcomes related to Toxic Pollutants, which were included in the 2000 Agreement and also in the September 2013 draft.</p> <p>Given the occurrence of intersex fish in the Susquehanna that have been documented by the PA Fish and Boat Commission and reported on your website (Nov. 17, 2010), as well as the growing concern about emerging contaminants, it seems unconscionable not to address toxics in the new Agreement. Aside from the adverse impact of toxic chemicals on the living resources in the Bay and our waterways, our local Comprehensive Plan anticipates our need to withdraw water from the Susquehanna to supply our expected population growth, (Section 6.4.4, p. 6-11) we also have a concern about our terrestrial living resources!</p>	Cecil Land Use Assn	3/15/2014
<i>Toxic Contaminants Reduction</i> 23 <i>Outcome</i>	Reinstate Toxic Contaminants Outcomes	<p>As you revise your agreement, [we] urge the CBP to reinstate your commitment to reduce toxics as an inextricable part of restoring a healthy bay ecosystem. A commitment to address toxics is disproportionately important to human health and quality of life for the bay's largest concentrations of citizens, our urban communities. Targeting toxics will lead to many of the improvements you seek in habitat and fishery abundance, as we have shown with progress on our urban river.</p>	Elizabeth River Project	3/13/2014

Toxic Contaminants Reduction
23 Outcome

Reduce Toxic
Contaminants -
Pesticides

Because of this and the reasons discussed in our comments, Beyond Pesticides recommends that the Draft Agreement should be amended to include specific goals addressing toxic contaminants, especially with regard to pesticides. Universal monitoring and control plans must be set for these dangerous contaminants.

By ignoring not just pesticides but all toxic contaminants, the Chesapeake Bay Program ignores both known and unknown risks threatening the Bay. It undermines the very goals and ambitions set forth within the Draft Agreement and brings into question the small, but significant gains made through the hard and dedicated work of the last five years. No matter how inconvenient, the Program cannot parcel out the issues it deems worthy of attention if it is to be serious about taking the Chesapeake Bay forward.

Beyond
Pesticides

3/17/2014

1) the establishment of RPA (Resource Protection Area) like 'zones' or boundaries where roads either traverse or come close to streams or rivers. Descending slopes would be given wider zones, considering that any ice or snow melt would flow off toward a stream or river more quickly. "Crossing Protection Areas" or Zones.

2) Modified plowing practices either in the full extent of these zones, or, in narrower sub-zones, e.g. across bridges or crossings and to a given extent beyond, in a manner which the plows would first plow snow (and presumably any spread electrolytes) toward the middle of the crossing, and then by some means (plowing) either push/plow said pile to a certain distance or boundary from the crossing, or, given crossing load (weight) restrictions, utilize an inner lane area to store the pile until it can be later removed. Though use of a lane may restrict traffic in certain areas, this may be not as much an issue as it might at first seem, given that during heavy snows at times only one lane is plowed anyway and traffic tends to be light. In addition, restricting plowing & treatment to one lane within such 'Crossing Protection Areas' would mean that electrolyte application could be halved to one lane, at least within said 'CPA', with the other lane being used as storage. In heavy snow events, where it would be difficult to keep up with clearing mixed snow/electrolyte piles from the inner lanes(s) during the snowfall, this work could be done later.

3) Lastly, the available mixes of electrolytes which tend to cause less toxic load on waterways, could be preferentially used within such boundaries, especially if cost is an issue, or, otherwise, if they are less expensive and more available, exclusively.

<p><i>Toxic Contaminants Reduction</i></p> <p>23 Outcome</p>	<p>Toxics - Snow Salts - Solution Suggestions</p>	<p>Marcello DelVecchio</p>	<p>3/17/2014</p>
<p>24 Healthy Watersheds Goal</p>	<div data-bbox="599 1036 854 1383" data-label="Text"> <p>Increased Healthy Watersheds Outcome</p> </div> <div data-bbox="854 1036 2064 1383" data-label="Text"> <p>Healthy Watersheds: Preserving healthy watersheds has merit, but a potential threat to our healthy watersheds is the offsetting of new loads either downstream of the new loads or in completely different watersheds. This can be addressed, and the miles of healthy watersheds possibly increased by adopting an Upstream Reduction Policy. We ask the jurisdictions to include an additional outcome: Increased Healthy Watersheds Outcome: Increase the number of healthy watersheds by implementing an Upstream Reduction Policy for offsetting new loads. This would require that every effort be made to find reductions in pollution upstream of a proposed new load before new pollution sources can be added.</p> </div>	<p>SOLS/LSR</p>	<p>3/7/2014</p>

25 Healthy Watersheds Goal	Protecting Streams/watersheds in good condition	<p>Under the Clean Water Act, the healthiest subwatersheds must be protected. Therefore, the narrow scope by which the current draft commits to protecting exceptional or high value streams limits the potential conservation impact of this goal. This outcome should maintain the health of a broader range of subwatershed categories from good to exceptional. States constitute stream health categories differently than their neighboring jurisdictions and the existing narrow margin for health maintenance would not advance the vision of the Agreement beyond Clean Water Act Requirements. The proposed expansion of this outcome would be directly complimentary to the previously-stated notion that the backsliding of any progress toward a given goal must not contribute to official baseline advancements. By maintaining good to exceptional stream health, the partnership can control or plan for backsliding in the watershed health such that HUCs (Hydrologic Unit Boundaries) ranging from good to excellent may not deteriorate to fair or poor health.</p>	Potomac Conservancy	3/17/2014
27 Healthy Watersheds Goal	Inclusion of Tier 2/3 waters in goal	<p>The Healthy Watersheds section establishes a goal of maintaining 100% of state-identified healthy water and watersheds by 2025. It is unclear if this goal will be based on Tier 2 waters as identified by the states or if it will Tier 3 designated waters. While the EPA has mandated the identification of Outstanding National Resource Waters, Maryland has not yet completed or published a designation list.</p>	Maryland State Builders Association	3/17/2014
27 Healthy Watersheds Goal	Overstepping CWA Regs	<p>... the final draft agreement fails to mention any acceptable minor level of degradation that might be necessary for valid societal reasons and still meet water quality standards. Ironically, then, this agreement is in a sense more stringent than the Clean Water Act and its implementing regulations.</p> <p>The “Healthy Watershed” concept – an EPA regulatory initiative that applies to streams far upstream of the Bay itself – seem too regulatory and too distant geographically to warrant its inclusion in the Bay Agreement.</p>	VAMWA, MAMWA	3/17/2014

27	Healthy Watersheds Goal	Include "Good" Quality	<p>The Healthy Watersheds Goal in the Final Agreement Should Include Waters of “Good” Quality: Sustaining state-identified healthy waters and watersheds “recognized for their exceptional quality and/or high ecological value” apparently leaves out healthy waters and watersheds that may be of “good,” but not “exceptional” quality, since the latter is usually a term of art in state regulations reserved for the best of the best. This would be a significant missed opportunity for watershed states to protect local and tributary waters that are still of good quality from decline into “fair” or even “poor” status, leading to similar declines downstream.</p>	NRDC, Ridgway Hall,	3/17/2014
27	Healthy Watersheds Goal	Non-Signatory Participation	<p>Healthy Watersheds Goal: As noted above with the Stream Health Outcome, COG’s members need to be involved with the designated Goal Implementation Team on any discussions regarding watersheds that have local implications - given the direct role and responsibility our local governments have in addressing local water quality.</p>	MWashCOG	3/17/2014
24	Healthy Watersheds Goal	expand goal	<p>Commit to protecting streams and watersheds in good condition, not just those of exceptional or high value. * The goal of sustaining state-identified healthy waters and watersheds “recognized for their exceptional quality and/or high ecological value” may leave out healthy waters and watersheds that are of “good,” but not “exceptional” quality, since the latter is usually a term of art in state regulations reserved for the best of the best (which must not be degraded under the Clean Water Act anyway).</p>	Chesapeake Bay Foundation	3/17/2014
24	Healthy Watersheds Goal	Balance with Population Growth	<p>This goal has merit however; there must be a common sense approach to meeting this that addresses the growing population, dwindling acres available to produce food and fiber to meet the increasing demand. As the world-wide population is expected to double by 2050, the demand for food and fiber will escalate. We must approach this goal with the intent of balancing the need for healthy watersheds with the need to supply food and fiber to the world. We are the key to the global economy.</p>	PennAg	3/17/2014

25	Healthy Watersheds Outcome	Stream Status	It would be good to have a process for changing the status of a stream segment/watershed that has improved its health . This would allow the efforts to change to less frequent and more cursory monitoring , so that efforts can be shifted to more problematic segments/watersheds that need to show more progress. SW managers need to know that there is a finish line for the major efforts; they will recognize that they can't forget those segments, and allow them to suffer a relapse. De-listing streams that are 303(d) impaired through a formal process would be good, avoiding a future local TMDL - would free up more resources for Bay TMDL efforts	Dave Briglio	3/4/2014
25	Healthy Watersheds Outcome	Define State Characterization; Changing WQ Standards	Pg8- "Sustain state-identified healthy waters..." If a state has not characterized any waters as healthy does that mean they maintain 100% of zero? Again establishing the universe of streams that are considered healthy would need to be accomplished first before anyone could estimate what resources are needed to keep them that way. Also as water quality standards are changed, waters that were not considered impaired under a previous standard can become impaired overnight because of a change in standards. This goal will put states in a catch-22. This possibility should be considered within the definition of the Goal.	Kenn Pattison	3/6/2014
25	Healthy Watersheds Outcome	Revise Deadline	delete " By 2025 " after "Healthy Waters Outcome" and leave the following language: 100% of state-identified currently healthy water and watersheds remain healthy.	SWQAC	3/13/2014
26	Healthy Watersheds Outcome	Healthy Watersheds Outcome	Sustaining the health of only state-designated waters and watersheds "recognized for their exceptional quality and/or high ecological value" will leave many other healthy waters and watersheds in excellent condition vulnerable. Defining healthy waters and watersheds this narrowly will also be a significant missed opportunity for watershed states to prevent the decline of local and tributary waters that are still of good quality from moving to "fair" or even "poor" status. Thus, while the proposed objective is reasonable, the goal and outcomes should be stated in broader terms. We recommend deleting the term " state identified ". Another option might be to include a quantitative outcome for designation of new waters of high quality on state lists.	Alliance for the Chesapeake Bay	3/17/2014
26	Healthy Watersheds Outcome	Change outcome language	Change outcome wording to " One hundred percent of waters and watersheds identified by states as healthy in 2017 will still be considered healthy by the same standards in 2025. "	HRSD	3/17/2014

27	Healthy Watersheds Outcome	Focus on Small Tributaries	By shifting focus to smaller tributaries with more easily managed watersheds particularly healthful region can be preserved. Improvement over large swaths of watershed may be rewarding; offering the satisfaction of large-scale change. But smaller areas with ideal quality can be lost as large areas are restored. The additive, overall contribution of small, healthy watersheds to Bay health deserves attention. In smaller watersheds collaboration between landowners is more likely; water quality might be able to be better managed, improved, and maintained. Pockets of good quality waters with low nutrient or suspended sediment load could be considered as similar to island preserves - high quality water “islands” within the Bay. Zones where quality tributaries intersect with the Bay should be targeted as excellent sites for preservation of stationary wildlife. Planting seed oysters and aquatic grasses in high quality areas could afford greatest health and function for those individuals. As these “islands” of health function they will become source areas contributing to overall Bay function. This model proposes preserving and protecting the islands of high quality then turning to adjacent areas for improvement to maximum benefit for aquatic life.	Ann's Backyard Forest, Ltd.	3/1/714
26	Land Conservation Goal	Sprawl & Growth Goal	Land Conservation, you need to add a goal that addresses land use and development in the urban and suburban areas of the watershed . Conservation will not work if we make poor choices in developing land that is not under conservation. This is golden opportunity for local government to step up, have a voice and get involved . Across the watershed, localities need to review their building codes and land use regulations to find ways to limit or reverse the damage done to the Bay and its waters. Key to the success of this will be coordination between neighboring communities to ensure policies are effective and fair. It is under these kinds of policies where we can mitigate the externalities of our built environment and living habits . Efforts to control residential runoff and air pollution from automobile usage will be vital to our success. We can’t assume technology will save us from this issue. We have to have the fortitude to change how we do things.	Patrick Torborg	3/9/2014
26	Land Conservation Goal	Sprawl & Growth	Further, a full evaluation of the impacts of increased and sprawling human growth and development needs to be addressed along with a strong plan to address their impacts must be addressed	Gregory Moser	2/3/2014
26	Land Conservation Goal	Sprawl & Growth - SAV & Wetlands	Ban further development in the critical area along the shoreline . We have continued to see housing developments going up on the Chester River where seagrass wetlands existed 5 or 10 years ago .	George and Frances Alderson	2/21/2014

26	Land Conservation Goal	Sprawl & Growth	Why not get to the root of the problem - population growth / human impacts . The subject is addressed somewhat but ineffectively. I would suggest the document recommend a REGULATORY LIMIT of one (1) child per watershed family. That is a simple and certainly effective goal. The Maryland legislature should approve it easily.	"Jim"	2/14/2014
26	Land Conservation Goal	Sprawl & Growth	Many of the most difficult topics were either only lightly brushed or avoided all together. There is no discussion of reducing transportation emission pollution...	Patrick Torborg	3/9/2014
26	Land Conservation Goal	Land use Options Implementation Outcome	Land Conservation: We support the research and evaluation provided for in the Land Conservation goal, however after the 2017 evaluation of policy options, potential incentives, resources and other tools that could assist local governments, the outcomes do not follow through with a commitment to making every effort at following the evaluation with action. We support adding a final outcome of: Land Use Options Implementation Outcome: By 2019, make every effort to implement policy options and potential incentive programs to support minimizing new impervious surfaces.	SOLS/LSR	3/7/2014
26	Land Conservation Goal	Sprawl & Growth - groundwater recharge	Why doesn't this document address groundwater withdrawals in the Southern Bay, which is responsible for at least 50% of the collective impact of sea level rise? While the issue of climate change may be responsible for some of the perceived rise and is still being debated, it is a fact that unchecked development and increased impervious surfaces that prevent groundwater recharge can be specifically addressed	Joe Davis	1/30/2014

MD is a raging corporate state that will not allow lost corporate profits for justice... That is the problem and yet, no environmental group campaigns against these neo-liberals!

One has to ask... the **three top concerns for the Bay involving MD policy are the dredging of the Port of Baltimore** with the goal of creating an international port that will absolutely fill the bay with invasive species that will kill all of what is in the environmental agreement so far, the **push for the natural gas** terminal that all know will pollute, and the **global corporations that are meat Perdue and Global Agriculture on the Eastern Shore which have chicken waste leeching** not only phosphates and nitrogen, but hormones and anti-biotics. Global Ag owns much of the farm land and uses fertilizer with a heavy hand. I won't even list the Harbor East building on toxic waste. These are the drivers of Chesapeake Bay health and if you notice... **all involve global corporations wreaking havoc on our public policy**. You will not hear O'Malley/MD Assembly say a peep about that because that would not be 'business friendly'.

The solution is easy peasy and I don't know anyone that doesn't agree... GET RID OF GLOBAL CORPORATIONS IN MD—PERIOD. Yet, all of O'Malley's and Baltimore Development involves global/national corporations that simply overuse an area to send product overseas for profit... You know, like Chinese environment destroyed by US corporate industrial pollution.

26	Land Conservation Goal	Growth - Corporate Industry		Cindy Walsh	1/30/2014
26	Land Conservation Goal	Growth - Corporate Industry	The Chesapeake Bay Program should separate itself from the E.P.A and Dept. of Agriculture who has turned a blind eye, and will continue to protect big industry, and corporations , not the 17 million people...I cannot trust these agencies and will not agree to a watershed agreement, if these agencies are any part of the project, as they have failed in the past...	Richard Slagle	2/19/2014
26	Land Conservation Goal	Growth - Corporate Industry	Maryland must take the lead to not only save our Bay, but to set an example for the rest of the country and the world. They must stop kissing corporate ass and regulate industrial and farm polluters .	Severn Savage	2/13/2014
26	Land Conservation Goal	Growth - Corporate Industry	As a waterfront property owner I am discouraged by the difficult time I had when I needed to put up a storage building but corporations are polluting the Bay on a regular basis causing major problems for the fishes and wildlife depending on the Bay for their existence.	Phillip Anderson	2.25.2014

		I've laid on the beaches that connect the bay to the Patuxent river and watch large cruise ships, navy boats, and other industry boats and wonder what all they are carrying on the boat under the sea level. We have a great deal of amazing wildlife that is known up and down the Eastern Shore and I would hate to see it all evolve due to our negligence and how companies could influence it as well. It would be tragic to see this portion be dropped and the Old Dominion company get the go ahead and build their liquidation plant to create jobs in Calvert County but to also effect the immediate area of the bay and subsequently the neighboring waterways , drinking water, and the wildlife that calls the watershed their home.			
26	Land Conservation Goal	Growth - Corporate Industry		Courtney	1/30/2014
		These outcomes completely ignore the population growth that is likely to drown improvements in Bay health. An should be added that explicitly addresses the mitigation of population growth			
26	Land Conservation Goal	Sprawl & Growth		Bernice O'Brien	3/14/2014
		Being that 85% of the Bay's shoreline is privately owned, certain restrictions should be imposed on those who live closest to the Bay's waters. Their development, especially shoreline hardening in inappropriate locations, has a direct impact on water quality and the surrounding environment. Zoning regulations and permits should be implemented to control what form of development is allowable. Living shorelines and other dynamic systems need to be utilized to benefit water quality issues and to respond to the encroaching sea level.			
26	Land Conservation Goal	Homeowner Restrictions		Chad	3/17/2014
27	Land Conservation Goal	Climate change	The Land Conservation section should direct land use planning to adapt to climate change impacts related to sea level rise.	Conservation Pennsylvania	3/17/2014

29 Land Conservation Goal	Land conservation goal	<p>The final Agreement should incorporate an increased goal for land conservation beyond the Protected Acres Goal of 2010. In 2010, the Chesapeake Bay Executive Order set a goal to preserve 2.5 million acres of land within the watershed. Under this 2014 recommitment to a Chesapeake Bay Agreement, the partners must be willing to stand behind a more robust land conservation strategy in order to tap the value of our existing natural filtration potential. The cost of restoring the Chesapeake Bay in light of increasing population demands can be significantly reduced if the partnership implements a concerted effort to prioritize preserved natural acreage. In conjunction with our partners at the Chesapeake Bay Foundation, the Conservancy supports a 2014 Agreement goal of reducing the average farm and forest land conversion rate to 40% by 2025. We maintain that the preservation of forest land and farm land is superior and far more cost-effective to having to retrofit increased impervious surface from subdivision and other forms of development in the future.</p>	Potomac Conservancy	3/17/2014
29 Land Conservation Goal	Smart growth	<p>Clean water and a clean, healthy environment overall are critical to attracting people and jobs to any region, including our own. Well-designed, compact and walkable communities linked by transit – key components of smart growth – will meet the growing market demand for this type of development, while reducing traffic-congestion, reducing infrastructure costs and the local tax burden for public services, and providing the basis for healthy and stable local economies. Combining smart growth with much improved stormwater management will help our region become more sustainable, competitive and attractive even as we add millions of people over the coming decades.</p> <p>Achieving goals to save forests and watersheds is not possible without implementation of smarter growth that consumes less land and reduces vehicle miles traveled and highway construction. Protecting our remaining healthy watersheds is not possible unless we direct the region's growth to areas of existing impervious surface...The Metropolitan Washington Council of Governments Region Forward plan and signed Compact commits to transit and transit-oriented development, to address climate change, air and water pollution through more sustainable patterns of growth. The Bay agreement should track with these COG goals.</p>	Stormwater Workgroup of the Choose Clean Water Coalition	2/1/2014
29 Land Conservation Goal	Smarter Growth Implementation		Coalition for Smarter Growth	3/17/2014

29 Land Conservation Goal	Polluted Runoff	<p><u>The Final Agreement Should Address Polluted Runoff:</u> The draft Agreement fails to mention polluted runoff, let alone set outcomes for reducing it. An outcome related to reducing polluted runoff would fit either within the “Water Quality” or “Land Conservation” goals. (double post - see Water Quality Goal)</p> <p>Land conservation. We note that the draft Agreement’s acreage outcome of two million acres by 2025 is considered to be a business-as-usual goal. The Chesapeake 2000 land conservation goal was more aspirational, and inspired a strong focus on land conservation among the states. Given projections for population growth in the coming decades, we suggest a higher outcome is needed to ensure the protection of our critical landscapes. Additionally, we recommend an evaluation of threat of conversion to select priority lands to be protected.</p>	Cons Pa, Va League of Cons Voters, Potomac Cons, Va Cons Network, Potomac Riverkeeper, PennFuture, Rock Creek Cons, Md Cons Council, James River Assn, Nat'l Parks Cons Assn, Friends of the Rappahannock, NRCD, NWF, Ridgway Hall, SELC, Sierra Club Pa Ch., VASWCD, 70+ Individuals	3/17/2014, 3/13/2014, 3/17/2014, 3/17/2014, 3/17/2014, 3/17/14
29 Land Conservation Goal	Higher Outcome, Evaluation of Conversion Threat		The Nature Conservancy	3/17/2014

29 Land Conservation Goal	Working Lands Conservation outcome	<p>Although sector-based water quality outcomes are not currently contained in the agreement, we still believe the partners should consider the role of the USDA as a critical partner in the success of water quality and land conservation goals. A working lands conservation outcome, previously offered by USDA, if adopted, would help recognize USDA support for efforts to support, track, and verify conservation practices on farm and forest lands. As previously suggested, such an outcome could read: “Work with private landowners to apply new and effective conservation practices on 4 million acres of working lands in high priority watersheds by 2025 to improve water quality in the Chesapeake Bay and its tributaries.”</p>	Alliance for the Chesapeake Bay	3/17/2014
29 Land Conservation Goal	Partner-Specific Goals	<p>The Final Agreement Should Target Signatory-Specific Land Conservation Goals Throughout the Watershed: this section simply gives outcomes to track the loss of this land whether from conversion of forests and farms or to impervious surface coverage. A 2nd outcome would evaluate policy options and incentives that "when possible" would reduce consumption or conversion rates of these high-priority lands. Such an approach fails to acknowledge the land conservation community's distinguished record of accomplishment throughout the watershed. Rather than setting up a tracking system to document the loss of the CB's critical landscapes, the Agreement should establish strong & quantifiable goals for land protection for each Program Partner.</p>	Nat'l Parks Cons Assn	3/17/2014
29 Land Conservation Goal	Robust Management Strategies	<p>Land Conservation Goal: Land use issues are addressed differently by states and localities, but in the end land use is a very local issue. Therefore, any Management Strategies for this goal will need clear and robust processes defined for how local governments will be involved in the development and review of the methods and metrics being developed and assessed.</p>	MWashCOG	3/17/2014
29 Land Conservation Goal	Define Terms	<p>It is unclear as to what metric is used to define when the "protect" objective has been met for the protected lands outcome of an additional two million acres of land. Therefore the Partners will not know what efforts they are committing to in this part of the Agreement.</p>	HRSD	3/17/2014
26 Land Conservation Goal	expand goal	<p>Increase the goal for protected acres to 2.5 million from 2010. Commit to reducing the average farm and forestland conversion rate by 40% by 2025. *The 2 million acre goal was in the Executive Order Strategy and we should be able to exceed this goal with strong multi-state commitments to land conservation.</p>	Chesapeake Bay Foundation	3/17/2014

26 Land Conservation Goal	Land Use	Strengthen the [land conservation] goal to enhance water quality, as opposed to simply “maintaining” it!	David Cadell	3/17/2014
29 Land Conservation Goal	Smart growth	..we want to stress the importance of addressing the larger overarching problems of...land use. Smart growth practices that focus development where infrastructure already exists and that protects forests, agricultural lands and wetlands is vitally important for the Bay and warrants much more coordinated and rigorous implementation.	Anacostia Watershed Society	3/17/2014
29 Land Conservation Goal	Balance with Population Growth	Again, this goal has merit but there is a need to balance it with growth. We must balance the need for human nourishment with the need for sound environmental stewardship. This can be achieved by all sectors continuing to have open dialogue and being willing to accept that there is no one right answer. That instead, an “al la carte” approach will most likely be needed to achieve the major goal of Chesapeake Bay Restoration. For example: advances are being made in animal feed and nutrition of animal diets – this will evolve over the coming years, we will need to balance advancements in all the sectors against demand for land and open space. In the 2000 Agreement different essential issues are tackled as how to control development in order to prevent sprawl, LID developments, land use planning, tax incentives for sustainable developments, rehabilitation of brownfields, urban storm water retrofits, transportation and clean vehicle technologies. None of these are in the present agreements. They should be included with a specific outcome. What happened with this tool (was mentioned in the 2000 Agreement): "develop analytical tools that will allow local governments and communities to conduct watershed-based assessment of the impacts of growth, development and transportation decisions?" If it was developed it should be used in the present agreement as a way to establish new outcomes for the future years.	PennAg	3/17/2014
29 Land Conservation Goal	Sprawl & Growth	The issue of soil management is underrepresented in the draft agreement. Reducing fertilizer, pesticide use and maintaining healthy soils with appropriate structure is imperative for Bay health. An important component of success will be the effective, informal education of the (sub)urban homeowner. Largely misunderstood, causes and effects of soil compression are lost on large segments of residents within the Bay watershed.	Tatiana Marquez	3/1/714
29 Land Conservation Goal	Soil Conservation		Ann's Backyard Forest, Ltd.	3/17/2014

27	Protected Lands Outcome	Hunting	I love duck and goose hunting in your state but don't anymore because you jam all the out of state people into a few small areas. I know if you know someone from Maryland you're good to go but I don't. You expect everyone north to help clean the bay and don't let them use it. Take a look at how NJ does it.	Jeff Minnick	2/18/2014
27	Protected Lands Outcome	Fund Matching Program	Under the Protected Lands Outcome, there is a goal to protect 695,000 acres of forest land, another admirable goal. Again, using Adams County and Pennsylvania as an example, I must point out that forest land preservation efforts are hampered by the lack of a viable state level forest land preservation funding program. Pennsylvania has a nationally acclaimed agricultural lands preservation program that provides matching funds to counties that invest in the preservation of working farms, however, no similar state program exists for working forest lands that does not contain a requirement for public access. Just to note, that the preservation program for working farms does not include a public access provision. If a non-public access working forest land matching fund program could be established through Pennsylvania's Department of Conservation and Natural Resources there is already an existing model in USDA's Forest Legacy Program that could be adapted for such a state funded program. This could be looked at by all the Partners as a model and perhaps USDA could target block grants for each state	Bicky Redman	3/13/2014
27	Protected Lands Outcome	Base Acres on Measures of Ecosystem Services	While two million seems sufficiently ambitious, we urge that the final determination be based on scientific attempts to measure the amount of eco system services that the region's population actually requires (to include adaptability to climate change) and what amount of different land types will be required to provide them. This should include the need to offset nutrient and sediment loads from new population and economic growth.	Jim Baird, American Farmland Trust	3/14/2014
27	Protected Lands Outcome	Add Working Farm Acreage	The two million acre goal paragraph does not mention either farmland or working forest land. If acre goals are not currently projected for these working lands, we strongly request that they be set as part of the final draft of the agreement. We suggest that the current state goals be used as the basis for this number. If there is no acre metric specified for farmland at present, we would request that one be set prior to any finalization of the agreement. Failing to do so would greatly weaken the authors' stated goal to sustain working farms.	Jim Baird, American Farmland Trust	3/14/2014

27 Protected Lands Outcome	Potential Wetland goal overlap	The Protected Lands Outcome goal includes the conservation of 225,000 acres of wetlands and 695,000 acres of forest land by 2025. Although the FY 2012 Action Plan Land Conservation goal includes the forest land conservation goal, there is no mention of a wetlands conservation goal. It is unclear if the conservation of 225,000 acres of wetlands articulated in this goal is encompassed in the wetlands preservation goals outlined in the Vital Habitats section of the Agreement.	Maryland State Builders Association	3/17/2014
27 Protected Lands Outcome	Increase Acreage	Protected Lands Outcome: We recommend setting the goal at an additional 2.5 million acres from 2010 . The 2 million acre goal was in the Executive Order Strategy and we should be able to exceed this goal with strong multi-state commitments to land conservation.	NRDC	3/17/2014
27 Protected Lands Outcome	Define Terms	In the Protected Lands Outcome, what exactly does protecting an additional 2 million acres mean? That is about 5% of the entire watershed; what is the ultimate goal, and will it be sufficient to restore the health of the Bay and its inland watersheds?	Rupert Rossetti	3/17/2014
27 Protected Lands Outcome	Define Terms	Need to define "forest land of highest value" for the Partners to know what efforts they are committing to in the Agreement.	HRSD	3/17/2014
27 Protected Lands Outcome		Two million acres of conserved lands seems quite laudable, but we should make sure that the conservation is targeted . Goals for 225,000 acres of wetlands and 695,000 acres of forest land are respectable, but location is important . We request clarification on to what degree farmland is included in the two million goal and whether working forest land is included as well . As for funding the preservation, it would be helpful to be specific and to call for all individual jurisdictions to develop or strengthen their dedicated funding streams for land preservation.	Eastern Shore Land Conservancy	3/17/2014
27 Protected Lands Outcome	Local Tools & Resources	Historic land development had consumed vital habitats and ecosystems that once provided ecological services that contributed to the health of the bay. In order to improve the health of the watershed, sound and proactive land use planning should be implemented on the local level to protect the remaining open space and habitats from development. Obviously, land protection has to happen at the local level, but any clarification as to the tools or resources available may be beneficial to Bay Agreement signatories.	Eastern Shore Land Conservancy	3/17/2014

27	Protected Lands Outcome	Revise outcome	Rephrase: "Protected Lands Outcome: By 2025, protect an additional two million acres of lands throughout the watershed currently identified as high-conservation priorities at the federal, state or local level, including 225,000 acres of wetlands and 695,000 acres of forest land most effectively for enhancing water quality."	David Cadell	3/17/2014
27	Protected Lands Outcome	Potential land use goal/outcome	Urge that the Chesapeake Bay watershed agreement be broadened to include a land use section, which would examine land uses beyond conservation and to more effectively identify and address the detrimental effects of high population and high density development.	David Cadell	3/17/2014
27	Protected Lands Outcome	Affordable, Local Initiatives	Decades ago the city created an Annapolis Conservancy . It is or was a public urban land trust, the only one in the Nation. It's goal is to conserve land by gift in development areas and it offered an opportunity to a builder to take an IRS benefit for the land so gifted . Over the years within the 7 square mile area, the city has acquired 200 acres of small open space natural habitat parcels that has saved marshes and trees. It didn't cost anything to do except for a brochure to describe it. Volunteers supervise it. A simple program that if magnified by the number of towns along the Bay could retain valuable natural habitat.	Ellen Moyer, Former Mayor of Annapolis	3/1/714
28	Land Use Methods and Metrics Development Outcome	Add Location	AFT applauds the goal to develop the capacity to measure the rate (and, we would add the location) of land conversion. Indeed without such capacity, the rational for setting a protection goal comes into question.	Jim Baird, American Farmland Trust	3/14/2014
28	Land Use Methods and Metrics Development Outcome	Building Not Always Negative	While the goal statement certainly contains agreeable goals this section also seems to imply that land conversion is generally a negative to be avoided. Obviously economic growth and the construction of housing, schools, hospitals and other buildings that the public needs and desires are positive. In thinking about the Bay Program's need to enhance its public support to succeed we raise this perspective for your consideration as you finalize the agreement.	VAMWA	3/17/2014
28	Land Use Methods and Metrics Development Outcome	Impacts on Habitat & Wetlands	Up to the present, shoreline development has taken its toll on tidal wetlands. As well, development and land conversion adjacent to non-tidal wetlands have been the greatest threat to those ecosystems. This proposed draft agreement is largely silent on the impacts of development on habitat and other restoration goals. It is silent on the need for sound land use practices. These omissions reverse decades of clear policy statements on this issue in previous Chesapeake Bay Program agreements and studies.	Wetlands Watch	3/11/2014

28	Land Use Methods and Metrics Development Outcome	Reducing Conversion Rate Outcome	<p>Land Use Change: Coming up with a metric by which to measure land use change, by 2015, is probably acceptable, given the “processing” time for internal Bay Program actions. But to state that, by 2017, there will be an evaluation of “policy options and incentives, resources and tools” to assist local governments better manage, and where possible, reduce the consumption of agricultural and forest lands is to virtually ignore some twenty years of rigorous research and reporting by EPA, nongovernmental organizations, and academics around the country on the economic and environmental advantages of smart, sustainable growth patterns, and the ways to achieve them. Now is the time to make such change happen. We strongly recommend that there be an outcome related to reducing the average annual farm- and forestland conversion rate by 40 percent by 2025, through state and local policies, incentives, and disincentives.</p>	NRDC	3/17/2014
28	Land Use Methods and Metrics Development Outcome	Add Reduction of Land Loss	<p>The Land Use Methods and Metrics outcome is a real disappointment. We seem to be putting in place a system to measure the continued loss of agricultural and forest lands, rather than establishing a goal to stop or reverse the loss. This may not be the case, but it is certainly how the statement comes across. If we are happy to lose more of our natural and cultivated lands, has the tipping point been established, and if so, what is it? If not, how long will we continue to measure the extent and rate of loss before taking action?</p>	Rupert Rossetti	3/17/2014
28	Land Use Methods and Metrics Development Outcome	supprt green infrastructure; re-draft	<p>Land Use Methods and Metrics Development and Land Use Options Evaluation are both woefully inadequate outcomes but could serve as a first step toward addressing activities on land that are critical to achieving clean-up of the Bay watershed. these outcomes do nothing to ensure current innovation and endorsed technologies, such as green infrastructure, are widely implemented through policy improvements. Both outcomes should be redrafted to ensure states and localities get beyond the first step in addressing the role of land protection and restoration for clean water and a healthy Bay.</p>	American Rivers	3/17/2014
28	Land Use Methods and Metrics Development Outcome	Expand Outcome	<p>Land Conservation outcomes must do more than address the rate of conversion of porous landscapes to imperviousness. The outcomes must work to increase the rate of restoring impervious land or replacing natural function of existing impervious surfaces through restoration of impervious or disturbed land cover and retrofitting land uses that impact water quality.</p>	American Rivers	3/17/2014

28	Land Use Methods and Metrics	Expand Outcome	the Land Conservation outcomes and Healthy Watersheds outcome are insufficient. Two of the three Land Conservation outcomes provide tools without proactively pointing those tools directly at conservation . Measuring natural land that is lost or disturbed and assessing local policy options may be helpful but is insufficient and ignores the innovative and effective practices already known to reduce sprawl, preserve farmland and prevent forest fragmentation . Land conservation must go hand-in-hand with restoration of landscapes or retrofitting land uses that impact water quality, notably land cover that is impervious or where runoff is disturbed.	Pennsylvania Campaign for Clean Water Stromwater Workgroup	3/16/2014
	Development Outcome				
28	Land Use Methods and Metrics	Modeling Shift to Pavement	Research to establish changes in permeable surface area with shifts in land use are exciting to consider. While easily accomplished with satellite imagery and computer image processing, a priori goals need to be fully developed. Use of such research could be of far-reaching benefit for planners and researchers. Planners could use a good modeling program to estimate the impact of land use in conjunction with precipitation ranges to consider community water needs. Researchers could use to model ecological effect as land use shifts. Particularly gifted researchers could use the model to estimate runoff and pollutant loads scaled by topography and plant coverage and type. An outline of land use types, important to ecologists and planners, is necessary. Categories of use with subcategories of ranges are a first step. Consider developing a complete, interactive model along the lines of the National Tree Benefits Calculator.	Ann's Backyard Forest, Ltd.	3/17/2014
	Development Outcome				
29	Land Use Options Evaluation	Revised Outcome	AFT finds the Land Use Options Evaluation Outcome to be inadequate and unsatisfactory. While the search for better tools, incentives, etc. that can assist jurisdictions is laudable and important, this goal leaves the region managing the rate of conversion forever, only reducing the rate of conversion “when possible.” We strongly recommend that this goal be revised. At a minimum it should read “strategically manage and reduce” the rate of conversion.	Jim Baird, American Farmland Trust	3/14/2014
	Outcome				
29	Land Use Options Evaluation	Define Terms	The Land Use Options Evaluation Outcome does not provide for the ability to measure if the policy option evaluation has been realized. The meaning of "evaluate" is unknown . The language could be changed to " By 2017 identify policy options, potential incentives... " to better define the outcome.	HRSD	3/17/2014
29	Outcome				

29	Land Use Options Evaluation Outcome	Protect Remaining Undeveloped Land	Bay watershed states should target funds for fee simple or easement purchase of sensitive lands, especially those bordering the Bay and its tributaries. Under the Land Use Options Evaluation Outcome, should we “manage” the rate of conversion for lands? ESLC believes that the language in this outcome should be written stronger to provide adequate protection for the remaining undeveloped land. Instead of being written to say “ assist local governments in their efforts to better manage and, when possible, reduce the rate of consumption... ” it should say “ in their efforts to better strategically manage and reduce the rate of consumption. ”	Eastern Shore Land Conservancy	3/17/2014
30	Public Access Goal	Connect Public Access to Infrastructure Investment & Open Space Acquisition	I ask the Bay states and the Commission to initiate and support executive and legislative actions that require public access consideration be given in ALL cases of local, state and federal public infrastructure investment. NOT just park acquisition and development, but roads, ports, dredging projects, defense development and de-authorization, and any other investment opportunity where bricks and mortar are involved... With reduced public budgets, this is often years and sometimes decades away. I ask that you make a direct connection between increased land conservation and open space acquisition and public access , even for lands that are in an undeveloped state. As paddlers, we seek out the wilder places, so dealing with an undeveloped access point is less of a challenge than an opportunity for our community...	Ralph Heimlich	2/19/2014
30	Public Access Goal	Access Connections to Land Conservation	This point is related to the one above. Often the planned developments of public access points seem like they are designed more to support the local construction industry than water access. I urge you to support more natural shoreline access and less over-engineered constructed access points. This would serve to spread the limited public access budgets over more successful access opportunities , and for a large part of the water-using community, would be more congenial than bulkheads, concrete and pavement. Our paddlers only really need a small amount of parking and a lot of beach...With regard to Bay lands, the Bay states and the Commission are in a perfect position to exercise a bit of regulatory judo by leveraging approval for development by seeking exactions that require developers to provide public access sites as a condition of development. I urge you to harness the energy and wealth of the private sector to the extent possible in seeking increased opportunities for public access to the Bay.	Ralph Heimlich	2/19/2014

The heart of the Bay Agreement is the spirit of cooperation. But when it comes to federal funding sources for public access and land acquisition, parties to the Agreement sometimes revert to a spirit of competition for those limited funds. While understandable, I believe **the Bay would benefit from a consistently cooperative approach to seeking more funds for public access acquisition and development to expand the pool of resources available in the Bay region, rather than competition for available resources.**

30	Public Access Goal	Financing		Ralph Heimlich	2/19/2014
30	Public Access Goal	Limit Access to Limit Human Impact	Pg 3 – There is an inherent conflict between cleaning up the Bay and providing more access to the water. The most significant issue with the Bay is the ever expanding human population and the impacts humans have on the watershed and estuary. If the actual goal is restoration then limiting access and human impacts needs to be considered as an objective rather than arbitrarily setting a goal to increase access and thereby increasing the ability for humans to pollute the Bay.	Kenn Pattison	3/6/2014
30	Public Access Goal	Education & Outreach Crucial	There seems to be a contradiction between increasing human access to the waterways, where the cause of the pollution is from humans. On page 4, there are principles that are outlined addressing access. But the principles don't fully envelop the education and outreach component that is crucial to the success of the efforts that are being made.	Nic H	3/16/2014
30	Public Access Goal	Uncoordinated Access Systems	The access to recreational opportunities, particularly in Maryland, is Completely Balkanized into tiny jurisdictions of state, county and town authorities and even divisions within state government. This results in a system of totally uncoordinated fees, rules, hours, signage, internet resources that leaves even local users frustrated and bewildered. To attempt to attract casual users and visitors from out of the region to utilize these opportunities without fixing this issue is doomed to a poor response	Hank McComas	3/17/2014

30 Public Access Goal

Link Conservation to
Public Access

I ask that the Agreement simultaneously **preserve land and expand public access by tightly linking public funding and public access**. Land that is protected from development through the use of public funds is far too often then closed to public recreational use.

The Draft Agreement sets an **inadequate goal of 300 new public access sites** in 15 years for the entire Chesapeake Bay and assigns no responsibility for accomplishing even that small goal. The Agreement should raise that goal and institute responsibility through a **rigorous public access requirement for all land funded by public money**. The Agreement must strongly tie public funding of land preservation to public recreational access to that land.

The Agreement should also **require an annual report of hours that land funded with public money is open to the general public and of any fees charged** to the public for use of that publicly funded land.

Lisa Arrasmith 3/17/2014

Cons Pa, Wa
League of Cons
Voters, Potomac
Cons, Va Cons
Network,
Potomac
Riverkeeper,
Allegheny
Highlands
Alliance, Rock
Creek Cons, Md
Cons Council,

James River Assn, 3/17/2014,
Nat'l Parks Cons 3/13/2014,
Assn, NRDC, 3/17/2014,
NWF, Ridgway 3/17/2014,
Hall, SELC, 70+ 3/17/2014,
Individuals 3/12/14

31 Public Access Goal

Public access

The Final Agreement Should Reflect that Park Agencies Need Partners to Meet the Goal to Expand Public Access: Expanding public access should not be limited to those efforts advanced by local, state, and federal park agencies; rather, the draft Agreement should recognize and encourage partnerships that include the private sector, other institutions, as well as other governmental agencies.

33 Public Access Goal	Change outcome language	We suggest consideration of the following language: Public Access Outcome: Expand public access to the Bay and its tributaries through existing and new local, state and federal parks, refuges, reserves, trails and partner sites and by 2025, add 300 new public-access sites, with a strong emphasis on providing opportunities for boating, swimming and fishing, where feasible. (2010 baseline year)	Alliance for the Chesapeake Bay	3/17/2014
33 Public Access Goal	New outcome needed	This section needs an additional outcome....an additional outcome that focuses on a wider array of community activities that are water dependent or enriched by water including riparian recreation, manufacturing, transportation etc lead to communities in which the waterway is a core focal point of historical, economic and cultural programs.	American Rivers	3/17/2014
33 Public Access Goal	Pa Should Opt Out	This is an admirable goal however; it would be one that we would support the Commonwealth of Pennsylvania “opting out of”. Pennsylvania does not physically touch the Bay. We do not have the ability to improve public access.	Pennag	3/17/2014
33 Public Access Goal	Outreach	There should be an outcome related to developing partnerships that stimulates volunteer involvement in the resource restoration and conservation The draft agreement is missing the; who, where, which, when, why, and how of public access. Simply having access to a resource does not mean value for the resources will be ensured. Willingness to place a high value on Bay resources does not imply users will be appropriate custodians of the resources. Further, the proportion of residents within the watershed having access to Bay resources may not be sufficient to alter behavior of the majority. A solution would be to tie access to education and appreciation. Current educational efforts targeting the K-12 residents have a limit to their effectiveness. Children are a great long-term investment but are not the short-term, immediate solution for Bay restoration. Their parents and grandparents vote, act, destroy and save right now. Link access to Bay resources with minimal caretaking education; permission to use Bay resources should be associated with basic knowledge of habitat protection.	Tatiana Marquez	3/17/14
33 Public Access Goal	Tie Access to Education		Ann's Backyard Forest, Ltd.	3/17/2014

31	Public Access Site Development	Replace Existing Access Areas with Protected Landscape Design	<p>Pg5 – Last paragraph “Increased public access to the Chesapeake ...” This may inspire some persons to care for the landscapes and estuary but it will also increase the likelihood of increased impacts from those and other less informed persons on the watershed and estuary. New access areas invariably increase impervious/compacted areas with addition of access roads, parking areas, boat launch areas, etc and the potential for an increase in pollutants to water. This seems counter-productive to the goal of restoring the Bay back to a period of time when there were millions fewer persons in the watershed impacting the watershed and estuary.</p> <p>Properly designed alternate or new access areas that replace existing “problem” access areas or are designed to protect critical landscapes would be beneficial.</p> <p>However, setting an arbitrary numerical goal for new access areas seems to ignore the above arguments.</p>	Kenn Pattison	3/6/2014
	Outcome				
31	Public Access Site Development	Limit Access to Limit Human Impact	<p>Including the tributaries within the goal to expand public access to the Bay represents a new expansion of the Bay Program into those states not bordering on the Bay. Why should Pennsylvania expand existing parks and create new parks, refuges, reserves, and trails as a Bay Program initiative? As nearly all park rangers or Fish and Boat Commission rangers would say, whenever new or expanded facilities are created, more pollution and the cost to control it is an inevitable consequence. It is counterintuitive to think otherwise. I suspect that the concept of increasing public access is an attempt to get more people appreciative of the Bay and thus more interested in restoring the Bay. I can envision that there could be local concern for paying for Bay restoration when there is no direct access to the Bay. Hence the desire to have additional access areas. This approach would have very limited acceptance in Pennsylvania</p>	Kenn Pattison	3/6/2014
	Outcome				
31	Public Access Site Development	Landowner Conservation Easements	<p>I believe Virginia should contribute its fair share. A great strategy for accomplishing this goal would be to create incentives for landowners who establish conservation easements to grant public access for the lifetime of the easement. We already have a “recreational use statute” that protects landowners from liability and it’s simply a matter of making the option attractive</p>	Tom Benzing	3/11/2014
	Outcome				

As a resident who lives close to the bay, I enjoy the benefits of our beautiful bay. I can also readily understand why people would want to have that same access, and I encourage it. Such access, however, must come with responsible management. That means properly balancing the rights of the residents with those of the guests. I think this distinction (residents versus guests) is an important one. As residents, we have an obligation to be hospitable. As guests, the public has an obligation to be respectful of those who live in the area they are visiting. **It is the job of the county to balance and enforce the rights of both.**

The work done at Triton Beach has been a good example of that effort. Proper facilities and parking have been mapped out and put into place and on the whole it has worked to everyone's benefit. When there has been a problem, the county has been quick to address it. Such progress takes time and resources—resources the county has in limited supply. Therefore, I support the plan that proposed 300 access points by 2025, and also the comments that **encourage full engagement of the local populace to ensure that opening access is appropriate and ensures to the benefit of all—not at the expense of one group over another.**

31	Public Access Site Development Outcome	Landowner/Visitor Balance	WR Kraus	3/14/2014
31	Public Access Site Development Outcome	Add Boat Ramps	D Doyle	3/14/2014

I would like to urge the Watershed Agreement to reflect on the very real need for more public access to the Chesapeake. It is a shameful condition when the biggest hindrance to enjoying the Bay is public access to Bay waters - everything is either private or owned by the state and off-limits. The number of public ramps is especially shameful, particularly in Anne Arundel County when there is not yet one operation boat ramp operated by the county - and the county is 400 years old. Does that make sense? Open up the Chesapeake - and soon

31	Public Access Site Development Outcome	Not Ambitious Enough	<p>Anne Arundel County like most of the Bay has very limited public access. It is a county with over 550 miles of shoreline and only one public beach (which frequently fills by mid-morning on summer weekends) and two public boat ramps. Our County government doesn't provide any public ramps or beaches!</p> <p>We are eager to support the Agreement's goal of increasing public access. However, we find it painfully weak on details. It simply restates the National Park Service goal of 300 new access points by 2025.</p> <p>We recommend the following improvements:</p> <ul style="list-style-type: none">• Re examine the 300 goal target. Based on a current inventory of almost 1200 sites, an increase of 300 over a 15 year period (a 25% increase) doesn't seem particularly ambitious.• Establish specific individual partner goals and implementation plans.• Actively engage local governments. They often own/control substantial inventories of potential access points.• Require recipients of State & Federal aid to submit robust access plans with aid applications. <p>Actively monitor & publicly report on progress.</p> <ul style="list-style-type: none">• Actively engage local user groups (like the Anne Arundel Public Water Access Committee) in the process.• An effective plan has timetables, identifies & commits resources, designates responsible parties, establishes performance measures, & institutes a transparent reporting process <p>Just recently, I was astounded and disappointed to learn that most of the extensive public lands purchased and maintained by Anne Arundel County taxpayers are NOT available to recreational kayakers, even though our environmental impact and launch needs are minimal. That makes no sense and is poor policy since the land is supposed to benefit the taxpaying PUBLIC. Enhancing low-cost and low-impact outdoor recreational opportunities should be a big part of that goal. We need governments, non-profit groups, and business officials to make public access to the Bay a top priority. Kent County has done a great job of establishing a system of public boat ramps and car top launch sites for recreation. That should serve as a model for other counties and state agencies charged with enhancing the Bay.</p>	Mike Lofton, Anne Arundel Public Water Access Committee	3/14/2014
	Public Access Site Development Outcome	Public Access to Benefit Taxpayers		Jack Chesson	3/17/2014

31	Public Access Site Development Outcome	Access for Swimming	Concentrate public access to rivers and tributaries where it benefits the swimming community. The triathlon and open water swimming communities host a large number of events every year in the bay states. Organizations that host these events choose locations based on ease of access, safety, scenery, and logistics. Following the event, feedback is provided by athletes and if successful, there is the potential to host events at the same locations year after year, therefore providing economic benefit to the area.	Meredith Dash, Open Water Triathlete	3/17/2014
31	Public Access Site Development Outcome	Intent of Access	The outcome does not sufficiently link public access and the intent of access. The language could be changed to " ..public-access sites to the watershed that provide opportunities for boating, swimming and fishing. ". The Partners will not know if the goal meets their respective citizen needs with the current wording.	HRSD	3/17/2014
31	Public Access Site Development Outcome	Angling Access	Public Access Site Development Outcome: Providing the public with expanded opportunities to access the Bay and its tributaries is a laudable goal. The U.S. Fish & Wildlife Service estimates that in 2011, recreational fishing in Maryland and Virginia contributed nearly \$1.7 billion to the economy. Increasing angling access will only boost these figures. CCA Maryland recommends targeting these opportunities—when feasible—to underserved communities and areas of highest need.	Coastal Conservation Association Md	3/17/2014
32	Stewardship Outcome	New Outcome	We suggest consideration of the following language: Stewardship Outcome: By 2015, work with Chesapeake Bay Program partners and other academic, local government and citizen organizations to develop a metric for evaluating progress in citizen stewardship.	Alliance for the Chesapeake Bay	3/17/2014

32 Stewardship Outcome	Stewardship & Engagement Goal and Outcome	<p>We recommend the Bay Program adopt the following goal: Promote and support initiatives that increase the number and diversity of local stewards who support and carry out the conservation and restoration activities necessary to achieve the goals and commitments of the agreement.</p> <p>The outcome for this goal would be the following: Within the first year, develop a behavior change index to be used to measure changes in the number of individuals engaged in stewardship behaviors at a regional scale. The index would allow for comparison among counties or regions and provide public research data to policy makers to set priorities and inform the design of regional and local programs.</p>	Chesapeake Bay Trust	3/17/2014
32 Environmental Literacy Goal	Assumptions of Environmental Literacy	<p>On page 5, there is an assertive claim that “Environmentally literate citizens are stewards of the Bay’s healthy watersheds.” This sentence does not really fit in context with the last paragraph on page 5 and, worse, it is not necessarily true. It is possible for an “environmentally literate” person to choose to do something some other observer may see as detrimental to the Bay. I suggest deleting the sentence altogether</p>	Allan Straughan	2/13/2014
32 Environmental Literacy Goal	Assumptions of Environmental Literacy	<p>Pg6- “Environmentally literate citizens are stewards of the Bay’s Healthy watersheds” This statement assumes that environmentally literate citizens always make the right decisions. The comments listed for page 4 indicate that this is not always true in a world where politics can over-rule logical/literate decisions.</p>	Kenn Pattison	3/6/2014
32 Environmental Literacy Goal	Expand Education Targets	<p>This is a sound plan, but I think it would be a great idea to educate more than just students on the importance of the Bay. It may be a great idea to put an ad up using Cox about the Bay. I know we have a small 15 second one with cleaning up after your pets and making sure not to pollute. It would work well if we focused on it like an election campaign. Talking but not attacking the importance of taking care of a big interest in our community. The Bay is very important to not just Virginia.</p>	Laura	3/4/2014

32	Environmental Literacy Goal	<p>... The focus to increase the number of students participating in meaningful outdoor watershed experiences is also a welcomed. However, the Chesapeake Bay Agreement must go further on this issue.</p> <p>Goal: The Chesapeake Bay Agreement must go further to encourage environmental education that prepares students for Science, Technology, Engineering, and Math careers. There should be policy and funding to help coordinate grade schools and Colleges and Universities with the intent to provide increased access to environmental programs and scholarships. This policy and funding behavior is especially prudent for communities where employment, career development, and job training is most elusive and where women and other minorities are in high demand for STEM careers.</p> <p>Funding Outcome: By the year 2017, 50% of colleges and universities providing environmental programs within the Chesapeake Bay will have funding to engage high school students. Such programs should be designed to increase access to Science, Technology, Engineering, Math careers for all. However, they must also have specific and adequate funding to increase access for women and other minorities. Entrance and success in these programs will provide an additional metric for measuring the efficacy of environmental literacy in grade schools</p>	Leslie Wilcox, Jeffrey Dawson, Sacoby Wilson, WE ACT, Irv Sheffey, Timothy Bodison	3/11/2014, 3/17/14
32	Environmental Literacy Goal	<p>Sustainable schools are of vital importance not only to the health of the Bay but also to the health of students and school staff. While mentioning “models of sustainable schools” in the School and School System Model Development Outcome is a step in the right direction, a greater emphasis should be placed on sustainable schools and their impact on environmental and human health by incorporating sustainable school language into the overall Environmental Literacy goal and creating a separate Sustainable Schools Outcome distinctive of the environmental education-related outcomes. Incorporation of a clear, distinct sustainable schools outcome would better align with the Mid-Atlantic Elementary and Secondary Environmental Literacy Strategy. Modeling language used in Goal 3, Outcome 3.1 of the Mid-Atlantic Environmental Literacy Strategy, a Sustainable Schools Outcome may read: “Support and highlight models of sustainable school buildings, grounds, and operations, making continual progress toward net-zero environmental impacts and improved human health</p>	Environmental Finance Center, UMD	3/17/2014

33 Environmental Literacy Goal	Outcome Instead of Goal	We suggest consideration of the following language: Environmental Literacy Outcome: Enable students in the region to graduate with the knowledge to use scientific evidence and citizenship skills to act responsibly to protect and restore their local watershed.	Alliance for the Chesapeake Bay	3/17/2014
34 Environmental Literacy Goal	More Specific Goal and Outcomes	The revised commitment does not provide an actual goal, only to say that the number of students participating in this program will be increased, but it does not say by how much. At minimum, the prior "1 MWEE per student" goal should be reinstated.	James River Assn	3/17/2014
35 Environmental Literacy Goal	Heritage & Recreation Program	An adult education should be developed ... unless it is followed up by continued engagements for adults, the benefits (of grade school education) may not result in meaningful long-term progress in understanding the challenges facing our rivers & Bay ... We propose the following ...: Develop educaiton programs to promote the unique heritage and numerous recreation opportunities of the Chesapeake Bay & its tributaries. Support the development & cultivation of historic landmarks and recreational amendities along our rivers and bay and provide identifying & interpretive signage. Support and enhance new connections to the Captain John Smith Chesapeake National Historic Trai, Star Spangled Banner National Historic Trail, and other water trails in the Chesapeake Bay watershed. ... We urge the Bay Agreement to include goals and outcomes to develop public environmental literacy with all citizens in the Bay, highlighting our great heritage and recreational resources	James River Assn	3/17/2014
36 Environmental Literacy Goal	Expand Education	Expand environmental education further. As a former classroom teacher, I know there are countless ways to frame a lesson. In the Bay states, we should use our watershed knowledge and reframe our curriculum so teachers may present other subjects from a clean water framework. One meaningful watershed experience is not enough. Technology should be worked into this framework until cross-communication between schools and clean water experts becomes effortless.	Meredith Dash, former teacher	3/17/2014

37 Environmental Literacy Goal	State Standards	Though we do not call for specific environmental literacy standards, ESLC believes that it would be advantageous for all of the watershed states to enact strong environmental literacy standards in order to improve their students understanding about their local environment and the environmental challenges of the entire watershed.	Eastern Shore Land Conservancy	3/17/2014
32 Environmental Literacy Goal	New Goal	<p>State and local school systems should take a systemic approach to environmental education to ensure programs and opportunities ultimately reach every student and teacher in the watershed. We believe they need to be specific, measurable, and bold to have true and lasting impact. Further, we believe that state and local school systems should take a systemic approach to environmental education to ensure programs and opportunities ultimately reach every student and teacher in the watershed.</p> <p>We propose the following Goal:</p> <p>All students in the region graduate with the knowledge to use scientific evidence and citizenship skills to act responsibly to protect and restore their local watershed.</p>	Chesapeake Bay Foundation	3/17/2014
32 Environmental Literacy Goal	New Outcomes	<p>We are troubled that the proposed new outcomes are less measurable than those articulated in the 2000 Agreement. We propose the following new Outcomes:</p> <ul style="list-style-type: none">• Outcome: Provide all students in the region with teacher-supported meaningful watershed education experiences in elementary, middle, and high school.• Outcome: All schools in the region will maintain their buildings, grounds, and operations using best practices to support environmental and human health.• Outcome: All local education agencies will implement system wide approaches for environmental education that include meaningful watershed educational experiences by 2020.• Outcome: By 2015, develop a process for measuring and communicating progress towards the outcomes related to student participation in teacher-supported meaningful watershed educational experiences and related activities.	Chesapeake Bay Foundation	3/17/2014
32 Environmental Literacy Goal	Toxics Goal and Outcome in Enviro Literacy	We also recommend that the Partnership include goals and outcomes under the Environmental Literacy section to educate students about these issues and how harmful they can be to our environment and human health.	Anacostia Watershed Society	3/17/2014

32	Environmental Literacy Goal	Adult Education	We recommend that the Partnership add an adult education component much like the Environmental Literacy goals and outcomes listed on page 10 of the Agreement.	Anacostia Watershed Society	3/17/2014
32	Environmental Literacy Goal	Allow Goal to be State-Specific	<p>We support the intent of this goal and again feel that the individual state is best suited to address how this should be achieved. In Pennsylvania, we have the Mobile Ag Lab affiliated with the PA Farm Bureau. The lab (6 in total) travel from school to school spending a week at each location educating 4th graders. This is just one approach that could be expanded to further meet this goal for Pennsylvania.</p> <p>The draft agreement is missing the; who, where, which, when, why, and how of public access. Simply having access to a resource does not mean value for the resources will be ensured. Willingness to place a high value on Bay resources does not imply users will be appropriate custodians of the resources. Further, the proportion of residents within the watershed having access to Bay resources may not be sufficient to alter behavior of the majority. A solution would be to tie access to education and appreciation. Current educational efforts targeting the K-12 residents have a limit to their effectiveness. Children are a great long-term investment but are not the short-term, immediate solution for Bay restoration. Their parents and grandparents vote, act, destroy and save right now. Link access to Bay resources with minimal caretaking education; permission to use Bay resources should be associated with basic knowledge of habitat protection.</p> <p>For the K-12 educational efforts this agreement does not indicated how successful school models and outcomes are to be found, supported, or highlighted. The draft agreement should include support for central, online clearinghouse(s) for bragging and sharing of successful educational programs.</p>	PennAg	3/17/2014
32	Environmental Literacy Goal	Tie Access to Education		Ann's Backyard Forest, Ltd.	3/17/2014
34	Meaningful Watershed Educational Experience Outcome	Revise Outcome	We suggest consideration of the following language: Meaningful Watershed Educational Experience Outcome: Increase the number of students participating in teacher-supported meaningful watershed educational experiences in elementary, middle and high school and develop metrics for measuring progress.	Alliance for the Chesapeake Bay	3/17/2014

33	Meaning Watershed Educational Experience Outcome	Education Starts with Positive Feelings	the goals listed are great but incomplete. While it is important to increase educational efforts, don't overlook the obvious and 'easier' ways to get people involved in Bay restoration. Positive outdoor experiences don't start with a lesson plan or learning objectives; they start with having a fun out in nature! This is especially true for younger children. Young children are certainly capable of learning about ecosystems and wildlife, but getting them hooked on the outdoors depends more on the number of laughs and smiles they have than the number of eureka moments. Get them to fall in love with the Bay first and they will be much more likely to seek out on their own the educational aspects you are currently emphasizing.	Patrick Torborg	3/9/2014
33	Meaning Watershed Educational Experience Outcome	Define MWEE	The agreement's emphasis on K-12 education is laudable, but should define the vague term "meaningful watershed educational experience"	Bernice O'Brien	3/14/2014
33	Meaning Watershed Educational Experience Outcome	Define Terms, Measure of Increase	The word "meaningful" is used in the outcomes but it is difficult to know what this means. The Partners will not know what efforts they are committing to in the Agreement if this term is used without further explanation. The word should be defined in this section. The Watershed Educational Experience Outcome does not indicate the degree to which the number of students participating should increase or the deadline for this increase.	HRSD	3/17/2014
33	Meaning Watershed Educational Experience Outcome	Expand Outcome	Continue with the idea that was in the 2000 Agreement that mandates that every high school student had to experience a meaningful outdoor experience	Tatiana Marquez	3/17/2014
33	Meaning Watershed Educational Experience Outcome	Soil & Water Conservation Districts	Focusing on increasing the number of students participating in teachers-supported meaningful watershed educational experiences throughout their school years will strengthen environmental literacy and foster environmental stewardship in the next generation. Soil and Water Conservation Districts are critical in helping meet these environmental literacy goals and providing Meaningful Watershed Educational Experiences to students and adults across the state.	VASWCD	3/17/2014

33	Meaning Watershed Educational Experience Outcome	Revised Goal and Outcome	<p>We recommend the Bay Program adopt the following goal: Every student in the region graduates with environmental literacy, having participated in teacher-supported meaningful watershed educational experiences in elementary, middle and high school. The outcome for this goal would be the following: Within the first year, develop baseline indicators and metrics to be used to measure subsequent increases in the number of students exposed to high quality environmental education experiences (MWEE's), number of teachers receiving sustained professional development in relevant content and environmental education pedagogy, number of certified green or sustainable schools and number of local education agencies implementing system wide environmental literacy programs.</p>	Chesapeake Bay Trust	3/17/2014
34	School and School Systems Model Development Outcome	Revise Outcome	<p>after "Support and highlight models of sustainable schools and local education agencies that use system-wide approaches for environmental education," insert: "and curricula development."</p>	SWQAC	3/13/2014
35	School and School Systems Model Development Outcome	Place Under Stewardship Goal	<p>We suggest consideration of the following language: School and School System Model Development Outcome: Support and highlight models of sustainable schools and local education agencies that use system-wide approaches for environmental education.</p>	Alliance for the Chesapeake Bay	3/17/2014
36	School and School Systems Model Development Outcome	Define Terms	<p>The School and School System Model Development Outcome does not define the measure for determining when "support" and "highlight" of school models has occurred and the Outcome does not define the deadline for this to be realized.</p>	HRSD	3/17/2014
35	Environmental Literacy Metrics Outcome	Align With Existing	<p>In addition to developing Environmental Literacy Metrics, the agreement should produce a set of common Environmental Literacy Standards that are aligned with state assessments and the Next Generation Science Standards.</p>	Bernice O'Brien	3/14/2014
36	Local Government Leadership Goal	Local Government Goals and Outcome	<p><i>The Partnership should better utilize its existing connections to local governments to help them develop the technical and financial capacity to succeed. In addition, the new Bay Agreement should contain explicit goals and outcomes regarding local government involvement and assistance.</i></p>	CBF	12/6/13

36	Local Government Leadership Goal	Local Level	My state NRCS (WV) and local conservation district fall within the watershed and are currently pursuing projects that seem to go against the goals of the Chesapeake Bay Watershed Agreement. They are currently pursuing an earth filled dam along Lost River, West Virginia in an area that's not prone to flooding. The dam will destroy natural wetlands and close off a tributary stream that is a natural habitat for native brook trout. There are already many of these dams in the region that are in need of repair and will probably be non-functional in the not so distant future. These projects seem to go against the watershed's goal and are not publicly supported. However, the Potomac Valley Conservation district from West Virginia's Eastern Panhandle sponsors such projects. Are there any checks and balances within the Chesapeake Bay watershed that keep these local districts from doing more harm than good? The local conservation district doesn't appear to be open to public opinion and I'm not sure they understand the goals of the watershed.	Wesley Foltz	3/18/2014
		Disconnect	the USC strongly feels that for ultimate success in the Upper Susquehanna River Basin it is critical that planning and implementation efforts address local community needs. One way to do this would be to develop management strategies that take into account the vast differences between the headwaters of the bay and those tributaries much closer to the bay itself. We suggest that if the		
36	Local Government Leadership Goal	Headwater Vs Other States' Needs in Management Strategies	Bay Program is sincere in getting local community acceptance about sustainably managing their watershed, then it must address local problems with local solutions . In NY that means the bay program needs to recognize the importance of other issues like local flooding and the resource concerns that result.	Upper Susquehanna Coalition	3/17/2014
			We suggest consideration of the following language: Goal: Promote implementation strategies and support initiatives that increase the number and diversity of local citizen stewards, including local governments, and help find common ground that will mobilize citizens to support and carry out the conservation and restoration activities that achieve healthy local streams and a vibrant Chesapeake Bay. Local Leadership Outcome: Engage, empower, and facilitate leadership by local governments through training, technical assistance, improved communications with states and removing barriers to implementation. Local Leadership Outcome: Identify and promote innovative financing solutions and increase the number of local governments that have developed and implemented local financing strategies to meet agreement goals. (2010 Baseline year)	Alliance for the Chesapeake Bay	3/17/14
37	Local Government Leadership Goal	Citizen stewardship language			

38	Local Government Leadership Goal	Elevate Local Governments	We urge the CBP to enhance the few mentions of local governments, in the current draft, into language that commits the partnership to meaningful action and identifies the ways to increase the capacity of local government - through technical assistance, financial resources, policy improvements, etc - to help fulfill each outcome. The agreement should commit to improve the capacity of local governments to broadly adopt cost effective and innovative green infrastructure solutions that are already widely endorsed by resource agencies, state governments, the scientific community and growing 'green' business sector.	Susquehanna Greenway	3/17/14
38	Local Tools and Resources Outcome	Support Local Resources	<i>We appreciate and support the concept of additional resources and tools being available to localities in their exercise of their prerogatives in local use. Localities have always been recognized as the most appropriate level of government at which to address local land use and development issues through zoning and other appropriate authorities. The Partnership must continue to support and not seek to supplant localities in this respect.</i>	VAMWA	3/17/2014
38	Local Tools and Resources Outcome	Provide Technical Assistance & Outreach	<i>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.</i>	Midshore Riverkeeper Conservancy	3/17/2014
38	Local Tools and Resources Outcome	Outreach to Engage & Encourage Affordable BMPs	<i>Despite the efforts by many to engage citizens, in well controlled, special environmental programs , over 30 years we have failed to engage an army of volunteers in doing small and affordable things to Save the Bay. We do have an energized core...a regiment size maybe, but not an army. If we had , we would not have a battle over storm water utility fees. We would have a loud and vocal majority demanding it. There are many creative ways to move forward on the little things that don't cost an arm and a leg. As an elected leader I was invited to join with 50 other Mayors active on environmental issues in Sundance, Utah. Believe me there are exciting model examples of community citizen environmental involvement programs around this nation that can be adopted in our watershed.</i>	Ellen Moyer, Former Mayor of Annapolis	3/17/2014

38	Local Tools and Resources Outcome	Outreach to Engage & Encourage Affordable BMPs	<p>However in the temper of the times, more regulation will push the public kicking and screaming over every initiative. With the opt out provisions of the current proposal, collaboration essential to bay clean up will fail. The next thirty years will be the same as the first. As long as community organization and personal outreach is shelved there will be minimum improvements.</p> <p>So I suggest to you that an active outreach program that touches the many with achievable low cost programs that excites and energizes an army of volunteers is essential to achieving clean water and clean air goals. It should become a written way of work in the proposed plan throughout the Bay Watershed.</p>	Ellen Moyer, Former Mayor of Annapolis	3/17/2014
			<p>I am all for maintaining the health of our beautiful Chesapeake Bay and it's tributaries. I own a cottage with 80 feet on the Potomac River. While boating you can't help but notice the erosion of shoreline all along the river. My question is why is this allowed to happen? My husband and I this year spent thousands of dollars on a new stone revetment to save our shoreline! Why, why do we not get a tax break for protecting the shoreline!! Maybe tax incentives for homeowners would help owners to protect their shorelines.</p>		
39	Economic Incentives Outcome	Homeowner Tax Credits	<p>I am in favor of any agreement that helps the Bay recover, but I hope the Watershed Agreement will be strengthened. We have to realize that upstream pollution robs downstream users of a precious resource. Nobody should have the right to pollute rivers and streams. Upstream users have gained wealth by dumping pollution into rivers, making downstream users pay to clean it up or suffer the loss of resources. It's time for all up streamers to become responsible citizens and ante up. I'm tried of hearing that developers, farmers and municipalities claim that it is too expensive to prevent pollution. It's not. In the long run it is too expensive NOT to prevent pollution.</p>	Carolyn Kulesza	2/6/2014
39	Economic Incentives Outcome	Hold Upstream Developers Accountable		John Mathwin	2/21/2014
			<p>We need to be good stewards of the land God has granted us. We also need to protect our rights and freedoms our forefathers won for us. Property rights must not be infringed upon, and government regulations should be a last resort.</p> <p>As someone mentioned in another comment, the cities and towns that have the highest population centers need to complete their repairs to stop discharging waste into the rivers and streams. In agricultural areas, riparian buffers should be installed on a voluntary basis and reasonable incentives should be offered to farmers to install them</p>		
39	Economic Incentives Outcome	Incentives to Local Farmers		Chris Walker	3/5/2014

40 Financing Strategies Outcome	Finance Advisory Committee	Create a Finance Advisory Committee , loosely modeled on the Scientific and Technical Advisory Committee. One strength of the Partnership is in providing a forum for the exchange of ideas,lessons learned, and facilitating innovation. Providing a venue for the development and transfer of creative stormwater financing mechanisms would be an ideal role for the Partnership. CBF supports the creation of a Finance Advisory Committee that would serve as an expert resource for local governments, as well as assist in developing financing strategies to achieve broader conservation goals, magnifying the expertise that the region already has in the Environmental Finance Cente r.	CBF	12/6/2014
40 Financing Strategies Outcome	Create New Revenue Streams	Maryland has increase its budget and taxes by 33% in only 8 years and has failed to be EPA compliant regardless of constant promises and new taxes for environmental purposes like the rain tax. It is time	James Blair	1/31/2014
40 Financing Strategies Outcome	Reduce Taxes	We have three (3) taxes for the bay (flush, bay restoration, and rain tax). I am so sick of the “Tree Hugger” taxes that I’m going to put as muchertilizer on my lawn as possible and not worry how much goes down the storm drain. Auto antifreeze, oops. After this farce the democratic socialists will come up with other taxes. I used to care about the bay but not anymore!!!	"Del"	2/19/2014
40 Financing Strategies Outcome	Advisory Committee	Finance Advisory Committee. While perhaps not to be addressed directly in the draft Agreement, we believe that the creation of a Finance Advisory Committee is something the Program should focus on immediately. Local governments throughout the watershed have expressed concerns about the costs of restoring and protecting Chesapeake Bay. The CBP could make a significant contribution toward addressing this concern by providing a forum where broadly applicable financing strategies could be developed and tested.	The Nature Conservancy	3/17/2014
40 Financing Strategies Outcome		the draft agreement must address critical funding needs for implementation to ensure the success of the goals and outcomes it outlines.		

40	Financing Strategies Outcome	Funding & Financing	Lastly, the Bay agreement should address the need for commitment to conservation funding mechanisms, coordination of best management practices (BMPs), & the potential distribution of funds for BMPs. Cleaning the Bay is costly, but piece by piece, local and state governments need to set aside the monies to pay for the efforts that will clean and preserve the watershed. In order to keep the costs down, effective coordination and communication of science based BMPs will have to be an essential part of local solutions.	Eastern Shore Land Conservancy	3/17/2014
41	Management Strategy Development and Implementation	Discretionary Language	Re-word current “opt in or out” for signatories to gain accountability and clearer commitment to the goals and outcomes stated	John B Reeves	3/6/2014
41	Management Strategy Development and Implementation	Discretionary Language	Do not allow for jurisdictions to “opt in or out” of the various goals and outcomes in the new Bay Agreement. The Agreement should specify roles and responsibilities of state and federal partners. On page 5 Goals & Outcomes, the entire third paragraph needs to be deleted. There can be no language that allows optional participation . The cost and burden of cleaning up the Bay and then maintaining a clean Bay must be shared among all that call the watershed home. In 2004, it was estimated that the Bay provides annual economic benefits ranging from \$33 to \$60 billion. It is irresponsible to expect some states and their residents to do the work necessary to make these benefits possible, all members should fully participate. If nothing else, work to limit and control the externalities that come from the business and development in our home states.	CBF	12/6/2013
41	Management Strategy Development and Implementation	Discretionary Language		Patrick Torborg	3/9/2014

“Discretion to participate” is not a commitment. This lack of commitment causes a conflict with potential funding of jurisdictions. Section 117(e) of the Clean Water Act directs the Environmental Protection Agency to issue grant money to the Agreement signatories to implement programs in the Agreement, but only “if a signatory has approved and committed to implement all or substantially all aspects of the Chesapeake Bay Agreement.” As the draft Agreement stands, upon signing the Agreement, none of the signatories would approve and commit to implement all or substantially all of the Agreement. This can easily be remedied.

There are some obvious goals and outcomes that do not pertain to all jurisdictions, such as NY, PA, and WV having no appropriate potential habitat areas for oysters or crabs in the Chesapeake Bay, and thus they will not be involved in oyster and crab restoration. **If a particular goal and its outcomes do not pertain to a jurisdiction, this can be stated in the specific Goal and Outcomes section. Other than providing for relief under these conditions, there should be no “discretion to participate”.** These “discretions to participate” should be clearly stated before the signing of the Agreement. If the current mechanism remains, this is not an agreement, and the appropriateness of any federal funding could be in question.

41	Management Strategy Development and Implementation	Discretionary Language		SOLS/LSR	3/7/2014
			DEVELOPMENT AND IMPLEMENTATION: We find this section acceptable as written, but ask that you include one more step that would help ensure the success of the Agreement. We believe that independent evaluation and verification would help improve the transparency of implementation. Mechanisms for independent evaluation and verification should be included in the Management Strategies.		
41	Management Strategy Development and Implementation	Independent Evaluator		SOLS/LSR	3/7/2014
			My greatest concern about this draft agreement is the lack of accountability through an opt-out provision . “[Each] signatory may exercise its discretion to participate in the development and implementation of individual outcomes’ management strategies depending upon relevance, resources, priorities, or other factors” must be deleted or reworded unless the agreement is to become meaningless. The Bay and its citizens need real action and accountability. This cannot be achieved by simply agreeing to broad goals or outcomes, while leaving loopholes for the real action—management strategies. These management strategies should be created in collaboration with states to minimize resistance to implementation.		
41	Management Strategy Development and Implementation	Discretionary Language		Bernice O'Brien	3/14/2014

Management Strategy		Management strategies must also be accessible, transparent, emphasize resilience, and consider future generations to limit inaction in the name of shortsighted cost-benefit analysis or election year politics.	Bernice O'Brien	3/14/2014
41 Development and Implementation	Transparency	Accountability is the number one requirement when planning and implementing a joint effort on the scale of this Bay Agreement. This Draft Agreement does address the accountability, but provides leniency that could ultimately result in subpar outcomes. By allowing various players of the agreement to decide what they chose to opt in and opt out of is catastrophic. This creates an inconsistency of the implantation, and when assessments are conducted the results will be skewed. The revision of page 5 is needed, to establish requirements while still allowing autonomy that will work with various conditions inflicted upon states.		
Management Strategy	Discretionary			
41 Development and Implementation	Language	the language must allow for flexibility of the term ‘implementation.’ As such, the Chair of the Chesapeake Bay Commission and the Administrator of the Environmental Protection Agency should be provided the latitude to appropriately define their means of implementation on a given outcome/management strategy with respect to their not being directly in charge of jurisdictional implementation. States should be held to consistent standards if they sign on to commit to management strategies on a given outcome. However, the Chesapeake Bay Commission should be able to sign on to an outcome without jargon-based obstacles due to the management strategy’s jurisdictional focus. The Commission could commit to alternative means of implementation like future legislative action to promote management strategies. This flexibility, however, must be defined in a sense that it cannot scapegoat signatories out of their implementation responsibilities under management strategies.	Nic H	3/16/2014
Management Strategy	Implementation			
42 Development and Implementation	language		Potomac Conservancy	3/17/2014

		<p>In addition to the development and implementation strategies outlined in this section, the Goal Implementation Teams should be tasked to work on identifying and coordinating implementation goals with revenue availability and prioritize actions based on adequate revenue; and an increased emphasis on land areas owned by and improved by state and federal authorities. The concern we have is that there are potentially significant polluters who have been excluded from the clean-up effort.</p>			
Management Strategy 45 Development and Implementation	Considering revenue and increased emphasis on state/federal land areas			Maryland State Builders Association	3/17/2014
Management Strategy 45 Development and Implementation	Unforeseen Consequences for Localities of Undeveloped Management Strategies	<p>Our comments are not directly related to the language of the agreement, but rather our concern about the implications of signing it. NY would be agreeing to potential management strategies that have not yet been developed and may not align with NY's needs. These management strategies would have the potential to affect our agricultural communities, municipalities and economic development across the region. New York's intent and interpretation of signing this agreement and committing to collectively advance the goals, and the interpretation and expectation of the other signatories may be vastly different. Without the details of the management strategies, the ambiguity of this document leaves interpretation of its intent up to the reader. Local farmers and municipalities</p> <p>Accountability. The provision allowing signatories to “exercise discretion to participate in the development and implementation of individual outcomes’ management strategies” depending upon relevance, resources, priorities and other factors” and “adjust their level of participation in the implementation of strategies as circumstances warrant” weakens the document considerably in comparison to past Agreements. One of the key features that has made the Chesapeake Bay Program a model for the nation is the existence of Agreements that constituted mutual commitments among the signatories. This Agreement should continue CBP’s leadership for the nation’s largest estuary and its watershed.</p>		Upper Susquehanna Coalition	3/17/14
Management Strategy 45 Development and Implementation	Discretionary Language			The Nature Conservancy	3/17/2014

Management Strategy 45 Development and Implementation	Discretionary Language	<p>there is a general concern among our members that the statement, "Signatories may decide to adjust their level of participation in the implementaion of strategies as circumstances warrant" will be perceived to weaken and undermine the Agreement. ... a joint and sustained effort by all the Agreement parties will be required to achieve the stated 2025 goals. We suggest that you revise or delete this sentence</p> <p>We strongly advise that the process by which they are developed be fully transparent in terms of partner actions and commitments. We strongly suggest that the CBP partnership actively seek broad input from stakeholders to ensure that management strategies result in an opportunity for debate and discussion, encourage meaningful commitments from signatories, and capture new ideas and build momentum for collaborative actions and public support. This must be active outreach rather than simply communications.</p> <p>The language of the "Management Strategies" section is also very "top-down". It talks about "empowering local governments" in the first paragraph but not local communities. We suggest that the language used here and the guidance provided to Goal Implementation Teams emphasize the need for processes in which citizen and community input/needs/concerns help drive the strategy and engage a broad base in the solution.</p>	SWQAC	3/13/2014
Management Strategy 45 Development and Implementation	Transparency, Outreach	<p>Executive Council should review and assess how the strategies are progressing during its annual meeting. We further suggest that because management strategies are of paramount importance in driving the accountability for Goals and outcomes, that this agreement be viewed with a limited time frame, such as 5 years, with the provision to evaluate the goals and outcomes, consider the adoption of new goals and outcomes, and rededicate the partners to the goals at this time.</p>	Alliance for the Chesapeake Bay	3/17/2014
Management Strategy 45 Development and Implementation	Reviewing Progress		Alliance for the Chesapeake Bay	3/17/2014
Management Strategy 45 Development and Implementation	Discretionary Language	<p>we suggest that no signatory should have the ability to completely “opt out” of participation. Rather than opting out, commitment to the outcomes should mean that the signatory will also participate in the development and implementation of all management strategies. Participation should simply be clearly defined by signatories. Participation may vary by state and by time and available resources. Essentially, each signatory should identify clearly what they will contribute and should revisit those commitments on a regular basis. We suggest that participation in strategies be defined in this way.</p>	Alliance for the Chesapeake Bay	3/17/2014

				Cons Pa, CCWC, Va League of Cons Voters, Potomac Cons, Va Cons Network, Potomac
			<u>The Final Agreement Must Provide Accountability for States’ Participation in Management Strategies:</u>	Riverkeeper,
			This “ opt in, opt out ” design robs the Agreement of any accountability and relieves signatories of the responsibility of actually committing to do any of the work, let alone their fair share. Not only does this mean that a signatory could potentially opt out of all of the goals and outcomes, but this creates the potential for “orphaned” goals or outcomes—those for which no jurisdiction elects to implement the management strategy. ... As the draft Agreement stands, upon signing the Agreement, none of the signatories approve and commit to implement all or substantially all of the Agreement. ...	PennFuture, Allegheny Highlands Alliance, Rock Creek Cons, Md Cons Council,
			Two options to addressing this problem include:	James River Assn, Nat'l Parks Cons
			1. For each outcome, each signatory will indicate, prior to signing the Agreement, whether it intends to implement management strategies related to the outcome. For example, the Tree Canopy Outcome may read: “Expand urban tree canopy by 2,400 acres by 2025. (Virginia, Maryland, Pennsylvania, New York, Delaware, West Virginia, Washington, D.C.)”	Assn, Friends of 3/17/2014, the 3/13/2014, Rappahannock, 3/13/2014,
			2. Draft the management strategies prior to jurisdictions signing the Agreement, and then have each jurisdiction indicate during that process which management strategies it intends to implement.	NRDC, NWF, 3/17/2014, Ridgway Hall, 3/17/14, SELC, Sierra Club 3/17/2014,
Management Strategy 45 Development and Implementation	Discretionary Language		With either solution, it requires jurisdictions commit to one another and the public as to how they intend to contribute to the collective efforts to advance restoration and protection ...	Pa Ch., VASWCD, 3/17/2014, 70+ Individuals 3/12/14
Management Strategy 45 Development and Implementation	Non-Signatory Participation		We would appreciate more information on how non-signatory partners can become engaged in the development and implementation of management strategies. The SGP and other locally-focused organizations throughout the watershed that are involved in management strategies related to healthy watersheds, public access, environmental literacy, could have a tremendous impact on our collective progress.	Susquehanna Greenway 3/17/2014

<div>Management Strategy</div> <div>45 Development and Implementation</div>	<div>Discretionary</div> <div>Language</div>	<p>One phrase in the preamble particularly resonated with me: “measurable results coupled with firm accountability yield the most significant results.” Unfortunately the Goals and Outcomes do not honor that declared fact. Page 5, para 3 enables a lack of accountability of the individual signatories, each of which can exercise its discretion whether to develop and implement the management strategies required to achieve the goals and outcomes. Please find some way to rectify this “opt out” clause.</p>	Rupert Rossetti	3/17/2014
<div>Management Strategy</div> <div>45 Development and Implementation</div>	<div>Language Edits to</div> <div>Current Intro</div> <div>Statements</div>	<p>Within one year of the Agreement, Goal Implementation Teams will develop..... Where appropriate, management strategies should describe how local governments, nonprofit and private partners will be engaged; and identify where actions, tools, financial assistance or technical support are needed to empower and support local governments, utilities and others to do their part; and, what steps will be taken to facilitate greater local participation in achieving the outcomes.</p> <p>Management strategies should take a holistic approach to meeting goals, consider multiple-benefits, feasibility and cost-effectiveness, and may address multiple outcomes if deemed appropriate. Goal Implementation Teams will reevaluate biennially and update strategies as necessary, with attention to changing environmental and economic conditions.</p> <p>The Management Strategies will have be developed through a defined process and schedule for providing that provides adequate stakeholder input will be incorporated into the development, review and reevaluation of each of the strategies. The Management Board will approve these strategies.</p> <p>If the Management Board determines that any strategy or plan developed prior to the signing of this Agreement meets the requirements of a management strategy as defined above, no new strategy needs to be developed. This includes, but is not limited to, the Watershed Implementation Plan strategies and plans for implementing the Chesapeake Bay TMDL.</p>	MWashCOG	3/17/2014
<div>Management Strategy</div> <div>41 Development and Implementation</div>	<div>Discretionary</div> <div>Language</div>	<p>We suggest adding the following language in the first paragraph on p. 11 under management strategies: “Where appropriate, management strategies should describe... consider the effects of climate change on the achievement of the outcome and identify adaptation strategies to account for these potential impacts.”</p>	Chesapeake Bay Foundation	3/17/2014

41	Management Strategy Development and Implementation	Increase EPA oversight	While this Agreement holds Bay states accountable to the TMDL, states were already required to adhere to the plan under the federal Clean Water Act—a requirement that a federal judge in Pennsylvania confirmed last October. The final Agreement should acknowledge EPA’s critical role in restoring the Bay and invite furtheroversight. This is the first time that an agreement opens the possibility to the State to choose to participate in the outcomes of the agreement by affirming “Except for those outcomes required by law and related to the implementation of the Chesapeake Bay Total Maximum Daily Load (TMDL) under the water quality goal, each signatory may exercise its discretion to participate in the development and implementation of individual outcomes’ management strategies depending upon relevance, resources, priorities, or	Center for Progressive Reform	3/17/2014
41	Management Strategy Development and Implementation	Discretionary Language		Tatiana Marquez	3/17/2014
41	Management Strategy Development and Implementation	Discretionary Language	The lack of accountability of the individual signatories, each of which can exercise its discretion whether to develop and implement the management strategies required to achieve the goals and outcomes. (Page 5, para 3).	Cecil Land Use Assn	3/15/2014
41	Management Strategy Development and Implementation	Discretionary Language, Interim Reviews	we are disappointed by the lack of accountability included in the agreement. Under the draft agreement, signatories may choose whether to participate in each goal and outcome, with the exception of the water quality goals. This opt in-/out strategy directly undermines the purpose of the agreement ... Participation by the states should be mandatory, as it has been in past Chesapeake Bay watershed agreements. In addition, we think interim benchmarks should be created for each goal and outcome to ensure that there is some accountability and regular review to track progress.	Chesapeake Conservancy	3/14/2014
42	Effective Date				

We believe the revision to the Chesapeake Bay Agreement is unnecessary. The Chesapeake Bay states are still working on achieving the goals of the 2000 agreement which are included in Chesapeake Bay Watershed Implementation plans in each state as they consider appropriate. The Clean Water Act section 117 does not require the Chesapeake Bay states to adopt a new agreement or update the existing agreement to remain eligible for funding under that section. We remain concerned that Chesapeake Bay states will not have the resources to meet the goals of the existing agreement there is no need for a new agreement. Especially since each state is currently implementing TMDL driven watershed implementation plans.

We believe the revision to the Chesapeake Bay Agreement is likely to disrupt ongoing activities. ... We believe that any goals established in a Chesapeake Bay Agreement must be achievable and affordable.

The draft agreement contains numerous new goals, some of which are expressed in numeric form. We would **encourage the states not to establish numeric goals in this agreement without determining that the goals are achievable and economically feasible** for persons who live and work in the Chesapeake Bay watershed, including the agricultural community, the development community, and municipalities. There is no explanation for how these numbers were chosen, whether they are scientifically defensible and what specific goal they are set to achieve. Moreover, there is no explanation for the legal authority under which the states would achieve the expanded numeric goals and how that legal authority relates to the existing Bay TMDL.

Wilmer
Stoneman on
behalf of Virginia
Farm Bureau
Federation

3/14/2014

43	Affirmation and Signatures	No New Agreement	<p>we question the need for a new Bay Agreement given the work that is still ongoing to meet the 2000 Agreement and each of the states’ individual Chesapeake Bay TMDL Watershed Implementation Plans. Efforts and attention, including local, state, and federal resources and funding, should be focused on meeting the Bay TMDL and associated Watershed Implementation Plans. Adding additional goals and measures not directly related to the Bay TMDL, such as toxins, could redirect necessary resources away from current efforts.</p> <p>In addition, we encourage the states to consider not signing a Bay Agreement that establishes numeric goals as outlined in this agreement without also determining that the goals are achievable and economically feasible for persons who live and work in the Chesapeake Bay watershed, including the agribusiness industry. Of concern, there is no explanation for the legal authority under which the states would achieve the expanded numeric goals and how that legal authority relates to the existing Bay TMDL.</p> <p>Further, states could be unintentionally opening themselves to further legal action and may be reducing their ability to manage their actions in an adaptive manner to prioritize action to restore the Bay. Instead, states may be ceding their authority to EPA and providing EPA with leverage that could allow them to dictate to the states how they must manage nutrient and sediment pollution issues.</p>	Virginia Agribusiness Council	3/17/2014
43	Affirmation and Signatures	No New Agreement	<p>We believe the proposed Agreement is unnecessary, counterproductive, and seeks to impose costly unfunded mandages throughout the Watershed. Few of the Goals and Outcomes listed in the proposed Agreement will produce any direct benefit within "headwater states" such as New York. The federal governement...has established a sufficient framework for the states and federal agencies to work cooperatively under as partners in the restoration of the Chesapeake Bay Watershed. The proposed Agreement is devoid of any mention of funding sources or resources to accomplish its proposed Goals and Outcomes. Accordingly, our ratepayers should not be forced to contribute to, nor should extremely financial resources be diverted from, meeting the requirements established under the New York State WIP-II and the TMDL.</p>	Binghamton-Johnson City Joint Sewage Board	3/14/2014
43	Affirmation and Signatures	Allow CBP to be State-Driven	<p>While PFB does not believe changes are necessary to the existing Bay Agreement, in the event that changes occur, a process prompted and driven by the Bay states themselves, rather than by EPA or other federal officials, should be substituted for the one utilized to craft the draft final document.</p>	Pa Farm Bureau	3/17/2014

The following topics do not clearly fall under any section that is currently in the agreement

<u>Row #</u>	<u>Agreement Section Tag</u>	<u>Theme</u>	<u>Comment</u>	<u>Source</u>	<u>Date</u>
		?	I am sorry to say this is another politically correct boondoggle. We have had enough of this shoved down our throats and are tired of paying the price for more BS. The Chesapeake has been and will always be an important resource, but fooling with Mother Nature and the farming community, ie. crops and poultry, is not the way to go. Just be sensible and leave the earth alone.	Marc Miller	2/18/2014
Agriculture					
		Agriculture	Agriculture, mostly in Maryland, have been subjected to an onslaught of regulation that has had a significant negative impact on the ag industry, while organizations such as NRCS, MDA, Soil Conservation have NOT been open minded or flexible in using all available technology to help farmers control their pollution.	Samuel Owings	2/10/2014
Agriculture		Technology Improvements			
		Goal to Advise & Monitor NMPs	There should be specific goals to provide more technical assistance (NCRS) to advise farmers , and on-ground monitoring of farm nutrient management plans	Stuart Stainman	3/4/2014
Agriculture					
		Manure Disposal Methods	A big factor that contributes to the nutrient pollution is the manure of animals raised on a farm that is not disposed of properly . Farmers should be held more responsible for the manure that the animals they own produce. A potential solution is for the farmers to burn the excess manure, to rid of it so that it cannot enter the water. Another plausible solution is for the manure to be recycled at processing plants and turned into fuels that the farmers can use to power their equipment and machinery. Factory farms shouldn't combine an abundant amount of animals on one farm because this creates an excess amount of manure. Animals should be spread onto different properties	Claire Sargo	3/4/2014
Agriculture					

Agriculture	Nutrient Laws Hurt Small Farmers	<p>The water quality of the Bay is very important to me since I like kayaking, swimming and boating. I am also a small organic farmer within the Critical Bay area who cannot sell any of my high quality produce because of the excessively zealous Nutrient Management law.</p> <p>The foundation of organic farming is high humus and organic matter of the soil. Such soil will hold water and nutrients many times better than conventional, synthetic chemical based agricultural soils. Yet the fees associated with tissue sampling, manure analysis and soil analysis can take up to 10% annually out of gross sales of a small farmer.</p> <p>According to the law, if I sell more than 2500\$ worth of produce, then every time I spread my horse manure under my 5 different types of fruit trees, I need an analysis of the manure and the 5 different types of trees. At the same time the big farmer down the street is mono cropping, spreading Roundup etc that kills soil microbes, depletes organic matter, causes erosion and chelates trace minerals while drawing government subsidies is only required to take one or two soil samples which is a miniscule percentage of his income. First and foremost you need to address the damage that synthetic chemical based agriculture is doing to our watershed, our air and our health before you go after the small guys. Be realistic, be fair. **DOUBLE POST see Toxics section</p>	Outi Denny	2/19/2014
Agriculture	Consider SmallFarm Viability	<p>The draft final Chesapeake Bay Watershed Agreement appears to be intended, in large part, as a vehicle to transfer additional authority over land use and other decisions to the federal government—authority that the Clean Water Act properly and pointedly reserves for state and local governments.</p>	Pa Farm Bureau	3/17/2014
Agriculture	Consider SmallFarm Viability	<p>While the draft document gives substantial attention to the goals of promoting maritime commerce, preserving wildlife habitats and expanding recreational opportunities in the Bay watershed, we continue to be concerned about its lack of insight into its intended future effects on agriculture.</p>	Pa Farm Bureau	3/17/2014
Agriculture	Consider SmallFarm Viability	<p>Any changes to the Chesapeake Bay Agreement must protect and enhance the future viability of agricultural operations in Pennsylvania, and take into consideration the significant environmental improvements that agricultural conservation practices have already provided for the Bay watershed—many of which predate the imposition of the Chesapeake Bay TMDL.</p>	Pa Farm Bureau	3/17/2014

Agriculture	Equally Accountable Across States	<p>To restore this vital economic and recreational engine, it is only fair that each sector takes responsibility for its share of pollution. The failure to hold agriculture accountable for its share of the pollution unfairly shifts the burden to taxpayers and other polluting sectors. The Bay states have made some important strides toward cleaning up the Bay. To finish the job, it cannot ignore the source of half the estuary’s pollution. The final Bay Agreement should hold agriculture equally accountable across state lines.</p> <p>MESSAGE DEVELOPMENT</p> <p>Messages intended to gain citizen support are rooted in ecological principles. Unfortunately, scientists are, generally speaking, unable to grab the attention of the general public. Scientists alternate between re-stating generalities without investing them with any sense of weight and overstating scientific findings such that audiences lose interest. Media representatives familiar truths such as: ‘trees are good for the environment’ are not provided with powerful or shocking evidence making the statement especially interesting for them to distribute.</p>	Center for Progressive Reform	3/17/2014
Communications	Message Development		Ann's Backyard Forest, Ltd.	3/17/2014
Dam Sediment Loadings	Conowingo Dam - Sediment Flow	<p>Dredge the sediment on the Penn. side of the Conowingo Dam so when the locks are opened during heavy rains, the sediment on that side does not flow over the dam and into the Chesapeake Bay, thus silting our Bay and smoothing our oyster bars. Then open the oyster bars in the upper Bay to powerdredging so the oyster bars can be cleared of the sediment and become productive oyster bars, filtering the Bay and creating oyster bars for watermen to work for years to come **DOUBLE POST see Oyster section</p>	Bubbly Powley	2/28/2014
Dam Sediment Loadings	Mitigate Sediment Pollution with Maintenance	<p>The clean up effort has been going on for some 30-40 years and no organization except the Clean Chesapeake Collation has made any mention or effort to address the Susquehanna River and the system of dams and reservoirs that according to the USGS, are for the most part completely silted in and are no longer capturing sediment and pollution like it has for the last 80-100 years when these dams were constructed. A larger focus should be given to these reservoirs in regard to maintenance that would increase their sediment trapping capabilities.</p>	Samuel Owings	2/10/2014

Dam Sediment Loadings	Sediment Goal and Outcome	<p>Goal- Dam Sediments: The build-up of sediment behind dams artificially alters sediment and nutrient loading, and embeds wildlife habitats. Scouring of these materials during storm events causes increased loads to downstream habitats, potentially impacting recruitment. By requiring sediment plans these impacts may be minimized.</p> <p>Dam Sediment Planning Outcome: Jurisdictions will require plans for addressing sediment that has built up or will build up behind dams in excess of ten feet high. These plans will be in place for all existing dams by 2020, and will be required of new dams that wish to be constructed.</p>	SOLS/SRK	3/7/2014
Dam Sediment Loadings	Conowingo Dam Outcome	<p>An outcome in the agreement provides an opportunity to show the public that the Bay Program is serious about fully engaging Maryland, Pennsylvania, the federal government, and private partners in solutions for increasing sediment storage capacity and reducing sediment deposition behind the dam while reducing storm scour events. An appropriate outcome would identify a process and timeline for development of a plan and its implementation.</p> <p>Accordingly, the following Partnership principle is recommended:</p>	Alliance for the Chesapeake Bay Clean	3/17/2014
Dam Sediment Loadings	Conowingo Principle	"Advocate for the dredging and maintenance of the Conowingo Pond through the FERC relicensing process or otherwise."	Chesapeake Coalition	3/17/2014
Environmental Justice	Add Goal	<p>Goal: The Chesapeake Bay Agreement does an honorable job at laying the ground work for restoring the natural environment in the region. However, it is silent on the conditions of the built and urban environment. Urban blight is a physical and environmental condition often linked to environmental justice issues in urban communities like Baltimore, Philadelphia, Prince George’s County, and Washington D.C. It should not be left out of any regional environmental policy. More specifically, the Chesapeake Bay Agreement does not include actions to address illegal dumping, abandoned housing, food deserts, or toxic pollution. The absence of such language is poised to inadvertently help sustain such issues.</p>	Leslie Wilcox, Jeffrey Dawson, Sacoby Wilson, WE ACT, Irv Sheffey, Timothy Bodison	3/11/2014, 3/17/14

56 Environmental Justice

Add Outcomes

Community Engagement Outcome: Expand the Chesapeake Bay Programs’ message beyond the conservation and protection of the natural environment to include the funding of more diverse program areas. Work with EPA Region 3 to increase appropriations to agencies, or programs that deal with environmental justice, toxics, and urban blight. In FY 2013-2014 there was no funding for these issues, including toxics; even though, a significant amount of comments on toxic chemicals were received. Increase outreach and funding for existing urban environmental programs, or to establish new programs that address urban food deserts, abandoned housing, illegal dumping, and community engagement with civic and community leaders. Fund and support these programs through grants with special attention given to minority owned businesses, non-profits, local jurisdictions serving urban communities as well as non-minority groups working on the above issues.

Decision-making Body Outcome: Expand efforts to recruit qualified minority owned non-profits and businesses, and local civic leaders for decision making agencies and boards. These partners should have a stake in environmental justice, food access, and eliminating toxic pollution in urban communities. Have a minimum 10% representation for these communities in agency staff and 20% representation on related boards. To be completed by 2020.

Leslie Wilcox,
Jeffrey Dawson,
Sacoby Wilson,
WE ACT, Irv
Sheffey
3/11/2014,
3/17/14

communities appears to be growing in some portions of government, the decision making involved in environmental policy and pollution-source-siting decisions continues to lack substantive input from these communities. Significant voluntary improvements in these communities are difficult to realize when these populations are not engaged.

Community Engagement Outcome: Increase outreach and funding for education programs in under-represented communities. Fund directly, or support through grants for non-profits, an engagement coordinator focused specifically on engaging and educating low-income and minority populations. Fund and engage at minimum one engagement coordinator per county by 2019.

Community
Engagement
Outcome; Decision-
making Body
Representation
Outcome

Decision-making Body Representation Outcome: Expand efforts to recruit qualified minority and low-income community representatives for decision-making agencies and boards. Have at minimum a 10% representation of these communities in agency staff and a 20% representation on related boards. To be completed by 2020.

SOLS/LSR
3/7/2014

Environmental Justice

56 Environmental Justice	Diversify Engagement	Many of the most difficult topics were either only lightly brushed or avoided all together. ...only cursory discussion of improving community engagement . The environmental literacy goals and outcomes slightly address engagement, but only with school children. There needs to be a concerted effort to get adults and people from all races, economic status, and backgrounds working on the Bay restoration . A policy that depends on educating the next generation does nothing to correct the negative behaviors of current adults. We can't afford to wait until the natural cycle of death and birth replaces the bad behavior.	Patrick Torborg	3/9/2014
56 Environmental Justice	Minorities Subjected More to Toxic Contaminants	I object to the fact that the Maryland March 4 "open house" to collect comments on the Draft Agreement is being held in Annapolis, rather than in Baltimore—the area of the state that has the most to lose if the Agreement turns a blind eye to toxic contaminants. This raises serious concerns about environmental justice . Are MDE/DNR/EPA really willing to let people living in poor, racially diverse neighborhoods live, swim, and fish along toxin-laden waterways like Curtis Creek, Bear Creek, and Back River, while at the same time going the extra mile to keep nutrients out of the rivers that are home to more affluent, predominantly white communities ? It is a sad day when the Chesapeake Bay Watershed Agreement is used as a tool to deprive poor people and their children of the clean, toxic-free waterways they and every other American deserve	Rebecca Kolberg	3/4/2014
56 Environmental Justice	New Outcomes	Fair, Effective, and Diverse Representation: The agreement's principles speak to diversity of representation and participation. However, specific outcomes should be provided that use the language of environmental justice to ensure diverse participation from chronically underrepresented minority and low socio-economic groups. Another group that is absent from this draft is that of future generations. The inclusion of 'sustainable' implies a future oriented vision. An individual should be appointed on each Chesapeake Bay Program workgroup or committee to advocate for future generations and prevent shortsighted decisions or intragenerational discounting in cost-benefit analysis.	Bernice O'Brien	3/14/2014

56 Environmental Justice	Human Health, Diversify Engagement	<p>The current agreement should remove the divide between ecological and human health and focus on revitalizing healthy Bay communities with a focus on both the natural and man-made environment. We also hope that you and your team will engage members of our DMV Metro EJ Coalition and the University of Maryland School of Public Health in future discussions to help shape the implementation of the proposed elements of the Chesapeake Bay Agreement in a way that will address the concerns of low income, communities of color that are impacted by the Bay.</p> <p>Environmental Justice and Environmental Health Disparities is a conversation and consideration that needs to be made at the forefront of any efforts – not an afterthought.</p> <p>We recognize the emerging interest in Environmental Justice. There is merit for this topic to be a component of the Chesapeake Bay Agreement. Within Pennsylvania’s Chesapeake Bay Drainage Area, we have diverse topography and diverse communities. To ensure that all citizens within the Commonwealth’s Bay Drainage Area have access to information on their role in improving water quality is needed.</p>	Sacoby Wilson, WE ACT	3/17/2014
56 Environmental Justice	Access to Information	<p>TARGET AUDIENCE</p> <p>Outreach to new audiences with principles of Bay management and protection should focus on introducing current environmental values to new audiences. Mature homeowners may not have had the opportunity to master the ecological principles the current generation of students now learns in elementary school. Certainly immigrants cannot to be expected to have a strong level of Bay science awareness.</p> <p>There are a number of assets in the battle to improve Bay health but all have their limits. Waiting for children to grow up takes too long; K-12 education cannot be the main focus for educational messaging. Self-selected adult volunteers may be willing to act as message carriers but are limited in the extent of their distribution. Reaching those who do not have the vaguest idea that their choices have consequences elsewhere will be a challenge but highly likely to turn the tide of citizen contribution to Bay health. Recruiting new participants to join the fight will ensure improved upstream care of the entire Bay watershed.</p>	PennAg	3/17/2014
56 Environmental Justice	Expand Audience & Outreach		Ann's Backyard Forest, Ltd.	3/17/2014

Goal, Impact
Analysis Outcome,
Impact Offset Policy
Outcome

Goal- Shale Gas Hydrofracturing: The most direct effect of this rapidly spreading effort to extract energy resources is the land use changes that accompany it. Forests, meadows, wetlands, and farmlands are being altered to uses that have less beneficial impacts on water quality. The change of these uses to well-pads, dirt roads, and pipeline right-of-ways increases sedimentation to our waterways and increases stormwater volumes, increasing erosion of our waterways.

Impact Analyses Outcome: Each jurisdiction will conduct comprehensive environmental impact analyses for this industry, including well-pads, dirt roads, and pipeline impacts. These studies will also include projections of how the impacts will increase based on projected growth of the industry. These studies will be completed by 2017.

Impact Offset Policy Outcome: A policy for offsetting the impacts of land use change associated with the shale gas industry shall be put in place by the executives of each jurisdiction. A model ordinance shall contain a ratio of 2 acres of abandoned minelands or similarly impacted industrial sites restored for every new acre of degraded land use.

SOLS/SRK

3/7/2014

41 Fracking	New Outcome	<p><u>The Final Agreement Should Address Hydraulic Fracturing:</u> The Chesapeake Bay watershed is home to rapid natural gas development through the use of hydraulic fracturing. Not addressing this growing source of nutrient and sediment pollution in the watershed is a glaring omission. A hydraulic fracturing outcome might read as follows:</p> <p>Hydraulic Fracturing Assessment Outcome: By 2017, assess the cumulative impact of hydraulic fracturing and related activity, including pipelines, roads and drill pads related to any increase in erosion and stormwater runoff of nutrients and sediment from drilling operations. Based on the assessment, develop guidance to ensure relevant states scientifically address options to reduce loadings and comply with obligations under the Chesapeake Bay TMDL.</p>	<p>Cons Pa, Va League of Cons Voters, Va Cons Network, Potomac Riverkeeper, PennFuture, Allegheny Highlands Alliance, Md Cons Council, Nat'l Parks Cons Assn, Friends of the Rappahannock, NRCD, NWF, Ridgway Hall, SELC, Sierra Club Pa Ch., 70+ Individuals</p> <p>3/17/2014, 3/13/2014, 3/17/2014, 3/17/2014, 3/17/14, 3/12/14</p>
41 Fracking	Stormwater Runoff at Pads	<p>Erosion and stormwater runoff at disturbed [fracking] sites and fragmented landscapes should be an urgent concern addressed in the Agreement. States must devote resources to address the cumulative impacts from site to production facility and market.</p>	<p>Pennsylvania Campaign for Clean Water Stromwater Workgroup</p> <p>3/16/2014</p>

		<p><i>The Principles are also well thought out and expressed. One addition that we would like to see is an addition to “Seek consensus when making decisions.” Consensus is only a good principle if the decision-making is done based on good science and sustainable use of our resources. At some point the jurisdictions must recognize that the desires of all special interests cannot be balanced and there are limits that nature itself sets. The strength of lobbying groups cannot and must not halt our ability to promote policies or enact legislation that will protect our local waterways and the Chesapeake Bay. We would suggest the Principle be altered to say, “We recognize the benefits of bringing consensus to decision-making, but realize that our local waterways’ and the Chesapeake Bay’s abilities to accept our pollution will ultimately dictate the level of action that we must take.”</i></p>		
42 Governance	Decision-Making		SOLS/LSR	3/7/14
42 Governance	EC Approves All Changes	Any changes to the agreement should be managed by the Executive Council. The decision-making process for the council must be transparent.	Joseph Valentine	3/10/2014
42 Governance	EC Approves New/Revised Goals	Designate the “Executive Council” as the body that is empowered to make changes to goals and outcomes	John B Reeves	3/6/2014
		<p><i>Revision of Agreement: Although not included in the Agreement, we understand that the Bay Program has added a new revision process allowing the Agreement to be modified by the Principals’ Staff Committee (state secretaries/EPA Reg. Administrator) rather than the Executive Council (governors/EPA Administrator) whose members are signing the Agreement.</i></p> <p><i>All previous agreements were signed by the Executive Council and could only be changed by their signature. We understand that Management Strategies may be altered by the Principals’ Staff Committee, but this should not apply to the Goals and Outcomes of the Chesapeake Bay Watershed Agreement.</i></p>		
42 Governance	EC Approves New/Revised Goals and Outcomes	EPA needs to provide strong and consistent oversight of municipal stormwater permit development by the states .	SOLS/LSR	3/7/2014
42 Governance	EPA Oversight - Stormwater Permits		CBF	12/6/2013
42 Governance	State Permit Accountability; Financial/Technical Assistance	At the same time, the states must create permits with clear standards and full accountability, benchmarks and deadlines , and implementation plans directly connected to achieving TMDL Waste Load Allocations. Further, the states must commit to assisting their local partners with financial and technical support while also expediting – and not further delaying -- completion of regulatory mandates.	CBF	12/6/2013

43 Governance	PSC changing outcomes without EC approval	The Conservancy does not support the current draft language that allows for changes by the Principals Staff Committee (PSC) to the outcomes without endorsement from the Executive Council. Previous Chesapeake Bay Agreements have not allowed the PSC to make changes to outcomes without approval by the Executive Council and it is unclear what this change is solving for. For the sake of transparency and public input, the language should be amended to guarantee that the Principals Staff Committee may not fundamentally change the outcomes without availing information to stakeholders and providing for adequate public comment.	Potomac Conservancy	3/17/2014
48 Governance	New Financing Committee	MSBA urges the Chesapeake Bay Program to establish a Financing Committee tasked with assessing specific costs associated with Watershed Implementation Plan actions and creating a prioritization of actions based on the most efficient use of limited revenue resources. The costs associated with TMDL compliance is staggering and not uniform across the different sectors and land uses. In addition, the Financing Committee should commission a thorough economic assessment of the costs and benefits associated with a clean Chesapeake Bay.	Maryland State Bu	3/17/2014
48 Governance	EC Approves Outcomes	Although the strategies may change over time, the goals and outcomes of the agreement represent the commitments of the Executive Council (EC); and so outcomes that are a part of this agreement should only be changed, removed or added by approval of the EC.	Alliance for the Chesapeake Bay	3/17/2014