

## Summary of Public Comments on August 23, 2021 Draft DEIJ Strategy Implementation Plan

### Chesapeake Bay Program DEIJ Action Team Response

*The following is a summary, arranged by topic area, of comments received on the August 23, 2021 version of the DEIJ Strategy Implementation Plan and the CBP DEIJ Action Teams's subsequent decisions related to each comment. Only comments that were evaluated as requiring a response are included below. All public comments submitted between August 23 and September 27, 2021 were reviewed and considered by the DEIJ Action Team in the development of the final DEIJ Strategy Implementation Plan. A complete set of comments received during the comment period will be provided upon request. All names of organizations that commented during this period are listed at the end of this document. Names of individuals have been removed to maintain confidentiality.*

Topic	Section	Comment Summary	Decision/Rationale of How Comment Addressed
Capacity	Focus Area 3: Advancing DEIJ through Watershed- related Work	3.3as1 - Re-evaluate the equity of this task process and who determines which decision points.	Will evaluate further.
Capacity	General	Expand responsibilities--too much of the tasks fall on the shoulders of the Diversity Workgroup the intent is good but the outcome will be poor because approximately 50% of the tasks fall on this one workgroup.	Responsibility for actions for which the Diversity Workgroup had been identified as "Lead" or "Support" has been expanded to include a wider range of partnership entities. A DEIJ Coordinator will be retained to coordinate partnership-wide DEIJ activities, contingent on availability of resources.
Capacity	Focus Area 2: Advancing DEIJ Internally	Action 2: Does the diversity workgroup have the resources to gather information and develop partner specific goals and strategies while also aggregate and disseminate best practices for recruitment, hiring and retention....this does not seem to align well with the skills of the diversity workgroup	We have added sequencing to the activities under action 2 to ensure the Diversity WG can accomplish these activities.

<p>Capacity</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.1.c Does the diversity workgroup have the resources to establish and maintain relationships with Historic Black Colleges &amp; Universities (HBCU) to inventory the job market and to leverage formal agreements? These tasks have a low chance of success because of resources and appropriateness of the responsible entity. For instance does the diversity workgroup have the skills and resources to inventory the job market for careers in the environmental field</p>	<p>Eliminated subtask 2 to inventory the jobs market. Subtask 2, "Make introductions to help jurisdictions establish relationships with staff at HBCUs and MSIs..." is part of the Diversity Workgroup Logic and Action Plan and, therefore, should be considered feasible for the Diversity Workgroup to complete.</p>
<p>Capacity</p>	<p>General</p>	<p>4.Capacity: We are concerned that there is not enough existing capacity to complete this work. Most actions are falling on the Diversity Workgroup and we are concerned there is not enough capacity within that group to accomplish such a large and detailed plan. Similarly, there are actions to be taken by GITs and Workgroups, which would fall largely on the Coordinators &amp; Staffers who are already overburdened. We recommend streamlining to the highest priority actions, and limiting those to ones that are SMART, provided the capacity requirements to advance SMART actions are in place. In addition, we recommend that rather than a generic template for DEIJ for the SRS process teams are instead instructed to include a discussion of how DEIJ was considered in the development of workplans</p>	<p>In response to capacity: The DEIJ Action Team has recommended that a DEIJ Coordinator be retained to coordinate partnership-wide DEIJ activities, contingent on availability of resources. In response to streamlining, as we finalize the implementation plan, we are identifying foundational, high-priority items that will help advance the other tasks identified in the plan. These priorities will be conveyed in the Action Team's recommendations to the PSC and the EC as we seek their endorsement of the plan. A more detailed timeline will be developed by the DEIJ Coordinator once they are on board. The SRS Team has taken steps to incorporate DEIJ into SRS guidance/documentation</p>

Capacity	Focus Area 1: Strengthening CBP's Authorizing Environment	Also, this approach puts an incredible amount of pressure and work on the Diversity Workgroup, which is tasked with leading and reviewing many of the components outlined in Action 1.	Two Management Board members have volunteered to be champions for this effort and will provide additional support to the Diversity Workgroup.
Capacity	General	Action 1.2 & Action 1.3: In order to realize authentic and meaningful change at CBP, the tasks and related actions within this plan should be integrated throughout each of the goal implementation teams. Currently, these responsibilities fall heavily on the Diversity Workgroup, which presents an issue of equity.	Actions and subtasks under Objectives 3 and 4 are designed to advance inclusion and diversity at the CBP, including within the Goal Implementation Teams, while also improving DEIJ competency and organizational "readiness".
CBP Diversity, Culture, Decision Making	Focus Area 2: Advancing DEIJ Internally	2.1b - Consider hiring a third party group/consultant to conduct focus groups and serve as neutral and protective liaison for POCS giving honest feedback to prevent retaliation of any form (social isolation/exclusion, relational aggression, promotion denial, etc). Consider the use of anonymous applications to safely track feedback and increase participation.	In resources, tools, notes, column, we had stated that a consultant would develop questions, but added that they should also deliver any focus groups/survey to help enable honest feedback.
CBP Diversity, Culture, Decision Making	Focus Area 2: Advancing DEIJ Internally	2.1c - Establish protocol to ensure classism does not become a barrier by valuing lived and professional experience at an equal or great level as college degrees (as per subtasks 3+4). Facilitate equity by establishing paid internships/fellowships for students while granting equal opportunity access to non-traditional students.	Changed 2.1.c subtask 6 to read, "Attend job fairs and other career events in diverse venues to promote internship and employment opportunities for people of all backgrounds." Subtask 4 focuses on relationships with HBCUs, but subtask 6 focuses on how we recruit and is a more appropriate place to respond to this comment.

<p>CBP Diversity, Culture, Decision Making</p>	<p>General</p>	<p>3.Decision-Making Process: Decision-making should be more inclusive of the diverse perspectives we are trying to draw into the partnership, which means going beyond the current Management Board and PSC structure and recognizing the many barriers to involvement that currently exist in the CBP. How will the Community Advisory Board be brought into decision making and what is their role in the DEIJ Implementation Plan?</p>	<p>The DEIJ Action Team presented options for establishing a stand-alone Community Advisory Board composed of individuals from underrepresented groups and EJ experts to the PSC in March 2021, and it was determined that the Action Team and partnership should instead identify options for increasing representation within existing advisory committees and across the partnership organization. Actions for establishing a community advisory board were removed from the plan. Recognizing that leadership must be engaged and accountable for ensuring diversity-related issues are given proper attention, the Accountability Framework calls for the partnership to identify Management Board "DEIJ Champions" to provide oversight and direction for implementation.</p>
<p>CBP Diversity, Culture, Decision Making</p>	<p>General</p>	<p>5.Workforce Development: We recommend the inclusion of a strategy to reach youth from underrepresented groups to build more diversity into the field. Start early with exposures through hands-on inquiry-based programs and career exploration programs for people who are underrepresented in STEM, policy, and other Chesapeake Bay fields of work. Continue this through the intern and early career programs that feed the CBP (e.g. C-StREAM, Chesapeake Conservation Corps, CRC staff program).</p>	<p>Added subtask 2 to 2.1.c: "Continue to support hands-on inquiry-based programs and career exploration programs for people who are underrepresented in STEM, policy, and other Chesapeake Bay fields of work through the intern and early career programs that feed the CBP (e.g. C-StREAM, Chesapeake Conservation Corps, Chesapeake Research Consortium staff program). Identify strategies to bolster and/or expand these programs or similar programs that recruit, advise, and mentor youth from underrepresented groups."</p>
<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>1. Section 2.1: Recommend government agencies look to Direct Hire Authorities for underrepresented groups.</p>	<p>Added this as an example of a "best practice" that should be explored in 2.1.as3</p>

<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>2. Section 2.1.a.3: Recommend starting with understanding partners' needs for help with recruitment, hiring, and retention, and define the tracking methods, to ensure partners use the resources provided.</p>	<p>Added "gathering information about partner needs" in 2.1.as1. Tracking methods will be further defined in the Accountability Framework.</p>
<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>3. Section 2.3: Consider doing another cultural humility training. Due to a now revoked Executive Order some federal agencies were unable to attend the previous series.</p>	<p>Modified 2.3.1s1 to state that additional cultural humility trainings should be held.</p>
<p>CBP Diversity, Culture, Decision Making</p>	<p>General</p>	<p>Action 1.2 &amp; Action 1.3: Principles of DEIJ should be adopted throughout CBP and the Partnership. These actions go beyond adopting a DEIJ action statement. CBP should invest and dedicate time to develop a shared language about DEIJ so that it becomes an integral part of CBP's organizational culture. The Alliance for the Chesapeake Bay developed a DEIJ Terminology Communications Guide as a resource for organizations to build their awareness of DEIJ concepts and terminology. Through workshops, trainings, and discussions, CBP staff and leadership should actively participate and dedicate time to embody and carry out DEIJ concepts and principles. These experiences will foster personal and professional growth among staff.</p>	<p>Agreed. Actions and subtasks under Objectives 3 and 4 are designed to advance inclusion and diversity at the CBP, including within the Goal Implementation Teams, while also improving DEIJ competency and organizational "readiness".</p>

<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Also, while it is important to promote diverse representation from BIPOC people into leadership positions, retaining BIPOC staff is half the challenge.</p>	<p>Agreed. This is why the measure is not 25% of the CBP- we do not want all the people of color to be entry-level. We recognize that there is a need to continuously assess our ability to retain and promote people from underrepresented populations.</p>
<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>The Bay Program must be accountable for their organizational and cultural practices that suppress staff with marginalized identities. For example, the Coalition is particularly concerned about the high turnover rate in the Diversity Workgroup staffer and coordinator positions. Leadership for many of the tasks and goals laid out in this plan require a high level of trained DEIJ knowledge and expertise and, due to the nature of these positions, can take a toll on an employee's mental and physical health. We recommend CBP consider the skill set and experience required for these positions before hiring and create multiple feedback mechanisms for staff, especially BIPOC employees and those in "diversity" positions, to express grievances and concerns to leadership.</p>	<p>Great points. The tasks identified in Action 2.1.b were designed to provide confidential feedback mechanisms for all staff, including BIPOC employees and those in diversity positions. Multiple tasks in Action 2.1 were also designed to improve recruitment, hiring, promotion and retention within CBP and among partner organizations.</p>

<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>CBP should consider ways in which the current infrastructure and systems limit diversity and how that can be addressed through structural and governance changes. For instance, given the political nature of certain positions within the Program, CBP should not rely on state and federal agencies diversifying their staff as the only way to meet the goals of the Partnership, and should review the current structure of the Program to identify opportunities to rectify inequities. For instance, seats could be added to decision making bodies, like the Management Board, Principals' Staff Committee and Executive Council, to include marginalized communities.</p>	<p>We agree that systemic changes are needed to meet the DEIJ goals of the partnership and recognize that more can be done to intentionally advance diversity through structural and governance changes. We believe the DEIJ Strategy, this implementation plan, and the Accountability Framework provide an initial roadmap to advance the internal, structural, cultural, and policy changes needed to create a more DEIJ-ready organization. The Action Team will present additional recommendations under the Accountability Framework to the PSC and EC as we seek their endorsement for the plan.</p>
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<p>CBP Diversity, Culture, Decision Making</p>	<p>General</p>	<p>It seems counterintuitive to create a new entity rather than incorporate those leaders into the three existing advisory committees, the Citizens Advisory Committee, Local Government Advisory Committee, and Scientific and Technical Advisory Committee.</p>	<p>The DEIJ Action Team presented options for establishing a stand-alone Community Advisory Board composed of individuals from underrepresented groups and EJ experts to the PSC in March 2021, and it was determined that the Action Team and partnership should instead identify options for increasing representation within existing advisory committees and across the partnership organization. Actions for establishing a community advisory board were removed from the plan. Actions and subtasks under Objectives 3 and 4 are designed to advance inclusion and diversity at the CBP, including within the Goal Implementation Teams and advisory committees, while also improving DEIJ competency and organizational "readiness". Added note to Action 1.3s3: "Where appropriate, include term limits for volunteers and appointees to allow space for new voices. Consider providing seats within each advisory committees for individuals from underrepresented communities. Review the process by which members are elected to advisory committees."</p>
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<p>CBP Diversity, Culture, Decision Making</p>	<p>General</p>	<p>CBP should also specifically review the current structure of the Citizens Advisory Committee (CAC) and consider renaming the committee to better reflect the population that works, lives and recreates in the watershed. Before considering a new name for CAC, we recommend also reviewing the purpose of the committee, which is to “advise the leadership of CBP by representing the residents and stakeholders of the Chesapeake Bay Watershed.” If CBP sees CAC as a forum for public input on the restoration effort, then the Partnership should reconsider the current makeup of the committee or change the name to reflect its true intent.</p>	<p>The CAC will take these suggestions into advisement as it evaluates options for increasing the diversity of its membership and the inclusivity and effectiveness of its current purpose and structure.</p>
<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEI Internally</p>	<p>Action 2.1.a: All CBP partners are required to conduct a survey of staff and leaders to determine benchmark levels of diversity within their organizations.</p> <ul style="list-style-type: none"> <li>○ All partners share their short and long term goals for both increasing the number and retention of these leaders in their organization as part of the participation in this group.</li> <li>○ Provide more professional development opportunities specifically for young professionals of marginalized identities.</li> <li>○ Revisit these goals collectively every six months and partners that are successful can serve as examples and mentors to other organizations.</li> </ul>	<p>CBP does not have the authority to require partners to conduct a survey of staff within their organizations. Certain partners, such as state and federal agencies, are directed by labor laws and procedures and may not have the authority to conduct such a survey. Actions under 2.1a are framed as recommendations to reflect the autonomy of partners and complexities associated with state and federal labor laws. Actions under 2.1.c are geared towards providing professional development opportunities for young professionals of marginalized communities.</p>

<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.1.c: The creation of official guidelines and/or an internal review process to ensure that job postings for positions incorporate DEIJ best practices.</p>	<p>Added to Action 2.1.c.s2: "Develop and distribute guidelines for incorporating DEIJ best practices into job postings. "</p>
<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.1.b: The staffer and coordinator of equity positions be adequately compensated, especially when they are leaders of color in an extremely white environment. There should be a review of recent high turnover rates in both positions</p>	<p>Compensation is determined and negotiated by the hiring organizations.</p>
<p>CBP Diversity, Culture, Decision Making</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.2.b: We recommend that a minimum number of 4 seats be made available to community members in all advisory committees (Citizens Advisory Committee, Local Government Advisory Committee, and Scientific and Technical Advisory Committee).          o Examine the process by which members make it onto an advisory committee and term limits on the committee.          o Track participation by former members and determine whether they still engage with the program after their term ends.</p>	<p>Added note to Action 1.3s3: "Where appropriate, include term limits for volunteers and appointees to allow space for new voices. Consider providing seats within each advisory committees for individuals from underrepresented communities. Review the process by which members are elected to advisory committees."</p>
<p>CBP Diversity, Culture, Decision Making, DEIJ Goals and Plan Framework</p>	<p>Focus Area 1: Strengthening CBP's Authorizing Environment</p>	<p>Action 1.2: The Program reviews the composition of CBP entities (ex: Goal Implementation Teams, Governance Action Team, Strategy Review System Team) using data collected through the 2021 Diversity Survey.</p>	<p>The bi-annual diversity survey is set to go out in 2022, and a more comprehensive study should be scheduled within a reasonable timeframe after the implementation plan is approved and begins work. We would like to improve the diversity survey to reflect a more inclusive definition of "underrepresented" the next time it goes out.</p>

<p>CBP Diversity, Culture, Decision Making, DEIJ Goals and Plan Framework</p>	<p>Focus Area 1: Strengthening CBP's Authorizing Environment</p>	<p>Action 1.2 &amp; Action 1.3: Address any lack of diversity and/or DEIJ competency first before attempting to make changes to the governance and management strategies.</p>	<p>As we finalize the implementation plan, we are identifying foundational, high-priority items that will help advance the other tasks identified in the plan. These priorities will be conveyed in the Action Team's recommendations to the PSC and the EC as we seek their endorsement of the plan. A more detailed timeline will be developed by the DEIJ Coordinator once they are on board.</p>
<p>CBP Diversity, Culture, Decision Making;</p>	<p>Focus Area 1: Strengthening CBP's Authorizing Environment</p>	<p>The next steps, according to the DEIJ Strategy Implementation Plan, involve updating governance and management strategies to fully incorporate this new commitment into CBP's operations. The undersigned members of the Coalition are concerned about the homogenous nature of the groups listed as leads for these subtasks, including but not limited to the Goal Implementation Teams and Governance Action Team. In order to ensure diverse perspectives, it is critical that CBP ensures these groups represent a broad cross-section of the population of the watershed</p>	<p>We recognize that the groups listed as leads for these subtasks (including GITs and Governance Action Teams) are more homogenous than the population of the watershed and we seek to improve the diversity of these groups through activities in 2.2. In addition, in Section 3.3, all groups are asked to identify where they can incorporate diverse voices into decision making and implementation activities.</p>

<p>CBP Diversity, Culture, Decision Making; DEI Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>Diversity Statement that “just as natural ecosystems depend on biodiversity to thrive, the long-term success of the Chesapeake Bay restoration effort depends on the equitable, just and inclusive engagement of all communities living throughout the watershed. This means to include a wide range of people of all races, ethnicities, income levels, faiths, genders, ages, sexual orientations and disabilities, along with other diverse groups, as well as promoting equal employment opportunities and expanding the diversity of the workforce and participants in restoration and conservation activities”. While this statement is very broad in scope and definition of diversity, the plan before us seems to focus on racial and ethnic diversity.</p>	<p>Substituted "people of color and other underrepresented communities" with "underrepresented communities" throughout plan, as this is a more inclusive definition of diversity. Where action is specifically directed to a smaller subset of "underrepresented" people, specific term (e.g., People of Color, BIPOC, Tribe) is used. The bi-annual diversity survey is set to go out in 2022, and a more comprehensive study should be scheduled within a reasonable timeframe after the implementation plan is approved and begins work. We would like to improve the diversity survey to reflect a more inclusive definition of "underrepresented" the next time it goes out.</p>
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<p>CBP Diversity, Culture, Decision Making; DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>DEIJ leaders in the field have found more success with their DEIJ goals if they lay a solid foundation of internal organizational DEIJ work first. Additionally, successful DEIJ outcomes depend on embracing both the administrative changes to policies and metrics, along with cultural changes within the organization to embrace DEIJ as a valuable component of the organizational mission. With this in mind, it is imperative that CBP takes meaningful action to identify internal DEIJ issues within the organization before rushing into external projects...The undersigned members of the Coalition recommend CBP focus strongly to identify organizational challenges and barriers, framework focus Actions 1 and 2, in the DEIJ Strategy Implementation Plan that address creating a diverse, inclusive and equitable space, while implementing Actions 3 and 4.</p>	<p>Yes, CBP is taking meaningful action to identify internal DEIJ issues within the organization after engaging SKEO to do an assessment, and this implementation plan follows up on the recommendations from that assessment. Additional work to understand organizational challenges and barriers is occurring under the Diversity Workgroup's current GIT funding project, "Scope 11," and continuous internal assessment and improvement is integrated into the plan while implementing actions 3 and 4. EO 14035 "Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce" will seek to address some of the larger systemic issues with hiring practices and these are outside the scope of the CBP implementation plan.</p>
<p>CBP Scope</p>	<p>General</p>	<p>Weaknesses: The plan seems to assume that the CBP is an independent corporation with the ability to drive human resources (HR) goals (for instance) of itself and of States and partner organizations</p>	<p>The plan does not intend to set or create priorities for partner organizations. The plan uses the terms "encourage" and "promote" to suggest an action or strategy that an organization could take to advance DEIJ within their own organizations and, therefore, at the CBP.</p>
<p>CBP Scope</p>	<p>Focus Area 1: Strengthening CBP's Authorizing Environment</p>	<p>Action 1.2 Subtask 2--recommend outcome specific language should be reviewed and approved by PSC (this for the purpose of achievability/legal sufficiency...)</p>	<p>The PSC does not usually get involved with reviewing Management Strategies. However, workgroups, GITs, and the Management Board will review the language.</p>

<p>CBP Scope</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2: Partners, ie state agencies cannot always dictate or control specific hiring promotion and tenure rules--they can request and recommend. These tasks should be changed to recommendations that are tuned to consider labor law and labor union impact on the various states and federal partners</p>	<p>Added that partner efforts to advance DEIJ in hiring, promotion and tenure should be consistent with state labor laws.</p>
<p>CBP Scope</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2: Recommend: these actions be changed to a recommendation that States and partners pursue improved internal diversity and equity in accordance with state law and procedures. These actions should be tuned to the authority vested in each partner agency</p>	<p>In 2.1.as2, modified language such that goals and strategies could be presented as recommendations in accordance with state laws and procedures.</p>
<p>CBP Scope</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.1.b: These need to be reviewed by the partners to ensure that labor laws and that agency leads can agree to the goals (for instance conduct confidential surveys and track over time staff sense of belonging). The intent is excellent, the outcome of these results may be poor.</p>	<p>Partners have had multiple opportunities to review the DEIJ implementation plan. To help support better outcomes, the Plan clarifies that CBP will work with consultants to plan and implement data collection efforts to ensure honest feedback can be given. Based on this comment, we added that the consultant should ensure questions are consistent with federal labor laws.</p>
<p>CBP Scope</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.1.c. These actions need to be reconsidered in light of the specific work of CBP partners. States rarely work directly with communities, instead they work through local governments and with non-profits. Tuning these tasks to reflect the nature of the relationship between CBP partners and implementing entities is needed</p>	<p>In 2.1.cs1, added local government partners to the list of groups to be engaged. In 2.1.cs5, clarified "CBP organizations" should be "CBP partner organizations".</p>

<p>CBP Scope</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.3.c. The lead on this action is the Diversity Workgroup and Management Board. Do these entities have the authority to direct funds? The answer is included in the notes column, the EPA cannot direct the partners about how they should use resources Recommendation: Rework this section to determine where the funds are sourced (a grant or state agency budgets?). Set realistic goals for the diversity workgroup and identify the outcomes that training would yield. For instance training diversity training at the leadership level results in minimum 3 new requirements to support implementing partners with better engagement with EJ communities</p>	<p>Reworked this action to set responsibility upon individual partnership organizations (i.e., signatories, NGO partners, etc.) to identify funding within own budgets to send Chesapeake Bay Program staff representatives to conferences, events, etc.. Diversity Workgroup role limited to first subtask, which focuses on gathering information about training and networking events.</p>
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<p>CBP Scope</p>	<p>Focus Area 3: Advancing DEIJ through Watershed- related Work</p>	<p>Action 3.2.a-c As stated earlier, most often the CBP and partners work with local governments rather than directly with communities. For example, stormwater goals are administered by the Maryland Department of the Environment through permits to the counties. These tasks should be tuned to reflect the role of EPA and partners vs. the implementers of Best Management Practices. Action c also seems like a task for a university or NGO focused in the EJ realm and the role of the communications team would be to highlight their work at some defined frequency to encourage partners to find ways to replicate success stories</p>	<p>The CBP partnership is composed of a wide range of organizations, including federal and state agencies, local governments, non-profit organizations and academic institutions. The Citizens Advisory Committee, for example, has a broad-based membership with representatives from agricultural and homebuilding industries, business, conservation, environmental foundations, law and civic groups.</p>
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<p>CBP Scope</p>	<p>General</p>	<p>2.Partner Organizations: The CBP can “support,” “encourage,” or “resource” the DEIJ work of partners in their respective organizations, but should not make statements that seem to create priorities for partner organizations. Related, the document should define “partners” and use the term consistently. The Strategy defines “partners” as “all members of the Chesapeake Bay Program partnership (members of the Executive Council, Principals’ Staff Committee, Management Board, Goal Implementation Teams, workgroups and advisory committees) as well as partners who make up the larger Chesapeake Bay watershed community.” This definition creates huge discrepancies in the amount of influence/control the CBP has over various types of partners so we suggest identifying sub-categories of partners to avoid confusion.</p>	<p>The plan does not intend to set or create priorities for partner organizations. The plan uses the terms "encourage" and "promote" to suggest an action or strategy that an organization could take to advance DEIJ within their own organizations and, therefore, at the CBP.</p>
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<p>CBP Scope</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Section 2.1: References “Internally” but then includes outcomes related to “partner entities”, which by definition is not internal. Recommend 2.1.a be limited to some smaller category of internal partners (e.g. EPA, or feds, or some other defined group with a smaller sphere of influence). Recommend that items addressing broader partners be moved to Section.</p>	<p>The Action Team expanded the scope of the original Action Plans of the DEIJ Strategy to reflect a broader definition of "internal" to include organizations and agencies that participate in the partnership, including the signatories of the Chesapeake Bay Agreement. The Executive Council Statement in support of diversity, equity, inclusion, and justice was signed by signatory representatives, as was the complementary PSC statement. Therefore, the Action Team thought it appropriate that the scope of the plan reflect a broader range of partners, particularly partners that signed the DEIJ statements. The plan uses the terms "encourage" and "promote" to reflect this more inclusive definition.</p>
<p>CBP Scope</p>	<p>Focus Area 3: Advancing DEIJ through Watershed-related Work</p>	<p>6. Section 3: The <i>Adarand Constructors v. Pena</i> Supreme Court decision precludes federal agencies from using racial and ethnic criteria as a basis for decision-making, including in grants. Suggest considering how this decision affects elements of this plan.</p>	<p>Added "The Adarand Constructors v. Pena Supreme Court decision precludes federal agencies from using racial and ethnic criteria as a basis for decision-making, including in grants." to action description.</p>
<p>CBP Scope</p>	<p>Focus Area 4: Advancing DEIJ Performance of Partners</p>	<p>Section 4: This area needs more thought to move beyond sharing the resources that we develop. We should consider what partners need to better support their DEIJ priorities and how we can best serve them. This starts with understanding and helping them to address their value proposition for engaging in the CBP</p>	<p>Added text to Action 4.1, s3 to gauge partner needs related to developing DEIJ strategies. This area will be evaluated and updated as more information about partner DEIJ efforts and needs is obtained and the CBP strategy and plan are implemented.</p>

<p>CBP Scope, Funding</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.4.a-b: These recommendations seem more appropriate to a NGO and/or university? It should not be the role of CBP to “develop a reference list of current best practices”. A better action would be to facilitate minimum 3 meetings annually with experts on DEIJ best practices and provide recommendations to management staff where and when appropriate. Subtasks 1-2 should ask EPA to identify existing funding and/or recommend new funding for CBP partners to achieve DEIJ goals. The role of the Diversity workgroup could be to highlight to partners where applicants were most successful at winning grants or applying funding resources</p>	<p>Modified 2.4.a.s1 to qualify that the reference list should be developed with input from DEIJ experts. To 2.4.bs2 modified the first sentence to read: "Identify existing funding and recommend new funding and resource gathering strategies and opportunities for partners to achieve DEIJ goals" and added: "Compile success stories to share with partners where applicants were successful at acquiring grants or using funding resources for DEIJ work. "</p>
<p>CBP Scope, Funding</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.4.b.This action does not seem achievable at the Diversity Workgroup level....at best this can be a recommendation to EPA leadership and Partner agency leadership to use diversity goals in performance measures</p>	<p>This is correct and the task was not assigned to the Diversity Workgroup. The DWG will support these efforts, but the subtasks were assigned to the Management Board, Signatories, Partnership Organizations, and Staffing Organizations. Added CBPO Director as "Lead".</p>
<p>CBP Scope, Funding</p>	<p>Focus Area 3: Advancing DEIJ through Watershed-related Work</p>	<p>Action 3.3 Some comments above apply. Resource availability/tracking responsibilities/direct engagement with communities</p>	<p>See other responses.</p>

<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>Systems of accountability could be made clearer, particularly as it relates to partnerships and the shared responsibility for goal attainment.</p>	<p>Indicators of Success added to the implementation plan table. Accountability will also be addressed in the Performance Tracking and Accountability Framework.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>Establish sequential deadlines for all tasks that directly impact progression of other tasks, particularly tasks in the short term which sets the start for later progress.</p>	<p>As the partnership finalizes the implementation plan, we are identifying foundational, high-priority items that will help advance the other tasks identified in the plan. These priorities will be conveyed in the Action Team's recommendations to the PSC and the EC as we seek their endorsement of the plan. A more detailed timeline will be developed by the DEIJ Coordinator once they are on board.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>Introduction, Goals, Objectives, Focus Areas</p>	<p>Purpose: It is unclear why the diversity increase goal is 25% overall but only 15% for leadership. Consider providing some form of justification for this differential or consider making the leadership goal 25% as well. When referencing "diversity goals" it is unclear if that entails environmental justice goals as well, if so, consider replacing use of diversity to DEIJ.</p>	<p>The partnership established the goal to increase the diversity of the overall partnership by 25% and leadership by 15% following receipt of the results of the 2016 Diversity Survey, which indicated that 13.7% of respondents identified as people of color (Native American or Alaskan Native, Asian/Asian American, Black/African American, Hispanic/Latino/Latina, Other or Multi-racial/multi-ethnic) and 9.1% as holding a leadership position. The results of the Diversity Survey are used to track progress towards the Diversity Outcome of the Chesapeake Bay Watershed Agreement. The use of the term "diversity goals" refers to the overall partnership and leadership diversity goals, as well as the diversity goals that may be established by each group under the Governance and Management Framework.</p>

DEIJ Goals, Accountability, Metrics, Tracking Progress	Focus Area 1: Strengthening CBP's Authorizing Environment	1.1s3 - Establish a distinct date or progress report period for all annually updated on-going tasks	Annually in Q4
DEIJ Goals, Accountability, Metrics, Tracking Progress	Focus Area 1: Strengthening CBP's Authorizing Environment	1.3 - Clarify which internal entity holds the Diversity Workgroup accountable for meeting deadlines and quality of work.	Added the Management Board in to oversee and ensure the DWG updates language in governance documents. Accountability will also be addressed in the accountability framework document.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Focus Area 2: Advancing DEIJ Internally	2.1a - Establish accountability measures for partners. Establish check in time or progress report periods for ongoing tasks.	Clarified that this information will be gathered regularly in 2.1as1. Also added in a related action to determine the appropriate reporting timeline.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Focus Area 2: Advancing DEIJ Internally	2.2a - There are no established timeframes for subtasks 2 and 3.	Added short term for subtask 2 and mid-term for subtask 3.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Focus Area 2: Advancing DEIJ Internally	2.3b - Establish sequential deadlines for all tasks that directly impact progression of other tasks.	As the partnership finalizes the implementation plan, we are identifying foundational, high-priority items that will help advance the other tasks identified in the plan. These priorities will be conveyed in the Action Team's recommendations to the PSC and the EC as we seek their endorsement of the plan. A more detailed timeline will be developed by the DEIJ Coordinator once they are on board.

<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>Focus Area 3: Advancing DEIJ through Watershed-related Work</p>	<p>3.3as2 - There is no established timeframe.</p>	<p>Made short-term priority task as this is foundational to other tasks.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>Strengths: The plan communicates the commitment of CBP leadership to bring meaningful change in the regular business of the CBP. It seeks to build a stronger foundation of current and future leaders who achieve the mission of the CBP. These goals combine to ensure that all communities achieve better access to a vibrant Chesapeake watershed</p>	<p>This is a note of support. No additional action is necessary.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>Strengths: The plan identifies the responsible entity and a general timeframe for the completion of each action item as well as a status update for each task.</p>	<p>This is a note of support. No additional action is necessary.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>Strengths: The plan is a valuable tracking tool to hold the CBP accountable to its intention of effecting meaningful change</p>	<p>This is a note of support. No additional action is necessary.</p>

<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>Weaknesses: The plan includes approximately 80 tasks, which is both a strength and a weakness. With so many specific outcomes outlined it would be useful to add a column to the tables that communicates difficulty to provide a clear view to leadership about expectations for success</p>	<p>As we finalize the implementation plan, we are identifying foundational, high-priority items that will help advance the other tasks identified in the plan. By setting priorities and identifying timeframes for actions, we hope to communicate the difficulty of implementation and set expectations for the timing of what is to be accomplished. These priorities will be conveyed in the Action Team's recommendations to the PSC and the EC as we seek their endorsement of the plan. A more detailed timeline will be developed by the DEIJ Coordinator once they are on board.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>Weaknesses: The Plan contains only general timeframes (short-term, long term, ongoing) for most of the 80 tasks and most of them are assigned to the Diversity Workgroup--which is not an actual organizational unit with clear authority and budget to accomplish these tasks</p>	<p>In recognition of the need for additional capacity to support implementation, the Action Team has recommended that the partnership retain a DEIJ Coordinator to help lead implementation, collaborating with the Diversity Workgroup when appropriate. Timeframes are defined in Appendix B. We chose to use timeframes rather than specific due dates to provide flexibility for action leads to respond to new information or changing circumstances.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>Streamline the plan to address only the areas where the CBP has direct control and focus on those areas to measure success</p>	<p>The implementation plan was developed by the DEIJ Action Team, a 45 member body composed of high-level representatives from partnership organizations. Action Team members identified actions and subtasks that they believe could reasonably be implemented by the partnership and their own organizations.</p>

DEIJ Goals, Accountability, Metrics, Tracking Progress	Introduction, Goals, Objectives, Focus Areas	Tie in the Purpose and Framework with the Plan Table	Actions in the plan table are organized by Focus Area and Objective. The Implementation Table utilizes the structure of DEIJ Assessment Framework, upon which a baseline readiness assessment has been completed.
DEIJ Goals, Accountability, Metrics, Tracking Progress	General	Use the Purpose statements to form a dashboard for leadership so that each meeting can start with a discussion about progress and challenges associated with implementing the DEIJ Plan	We are exploring options for the development of an online application and/or dashboard to display the contents of the plan and demonstrate progress.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Introduction, Goals, Objectives, Focus Areas	Use and infographic to highlight the 4 DEIJ Strategies	Plan introduction has been revised to more clearly display the plan elements.
DEIJ Goals, Accountability, Metrics, Tracking Progress	General	Incorporate more specific timeline for each action.	Timeframes are defined in Appendix B. We chose to use timeframes rather than specific due dates to provide flexibility for the partnership and action leads to respond to new information or changing circumstances.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Introduction, Goals, Objectives, Focus Areas	Consider a short background that places this work in the broader context of the CBP's DEIJ work	Additional context has been provided in the executive summary.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Introduction, Goals, Objectives, Focus Areas	Introduction: It would be useful to see an infographic of these four actions [Focus Areas]	The Introduction has been reformatted and expanded to be more reader-friendly and comprehensive.



DEIJ Goals, Accountability, Metrics, Tracking Progress	Introduction, Goals, Objectives, Focus Areas	Given the Strategies above and the implementation Plan there is an opportunity to better connect the purpose and focus areas to the plan	Plan introduction has been revised to more clearly display the plan elements.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Introduction, Goals, Objectives, Focus Areas	Purpose statements are disjointed because they have both specific measurable goals (ie ethnic diversity increase from 13 to 25%) and vague (ie help partners develop DEIJ leaders who understand	The goals identified in the plan were set by the partnership at the outset of the DEIJ Strategy development process. The goals will be assessed iteratively and revised to reflect new information, priorities, and partnership/community feedback.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Introduction, Goals, Objectives, Focus Areas	Recommendation: Adjust these statements to have measurable outcomes like the first statement and then use it as a dashboard for the PSC to assess progress.	The goals identified in the plan were set by the partnership at the outset of the DEIJ Strategy development process. The goals will be assessed iteratively and revised to reflect new information, priorities, and partnership/community feedback.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Introduction, Goals, Objectives, Focus Areas	Focus areas--redundant to the strategies suggest combining	The DEIJ Strategy recommendations are organized by Focus Areas. Each strategy falls under a Focus Area.
DEIJ Goals, Accountability, Metrics, Tracking Progress	Focus Area 1: Strengthening CBP's Authorizing Environment	Action 1: Subtask 3 need to add a specific timeline for updating statement--consider "no less than every 5 years the PSC will review and updated DEIJ statements	Subtask three indicates that the statements will be reviewed annually and updated as needed based on lessons learned and feedback.

<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>Focus Area 3: Advancing DEIJ through Watershed-related Work</p>	<p>Action 3.1.b. Recommendation: The responsibility for this tracking should be designated to the EPA and should be tuned to reflect resources. The Diversity workgroup could make recommendations to the EPA to track specific actions/outcomes. The diversity workgroup could partner with EPA staff to present tracking data annually to the PSC</p>	<p>Action lead for 3.1.b s1, s2, s3 has been set to CBPO Grants Team, CBPO Director, and DEIJ Coordinator. Subtask 3 has been updated to "Present tracking data to the partnership on an annual basis"</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>Introduction, Goals, Objectives, Focus Areas</p>	<p>1.Document Tone: The opening of the backgrounder should set a tone that recognizes that there is still considerable work to be done. Despite having included DEIJ for many years, there has been minimal progress, which should be recognized explicitly.</p>	<p>This point is addressed in the DEIJ Strategy document (pg. 12), however, explicit language relating the significant work to be done to advance DEIJ, despite a multi-year focus, has been incorporated into the introduction.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>Introduction, Goals, Objectives, Focus Areas</p>	<p>One of the first steps in creating a DEIJ plan is to define what you are trying to do and what success looks like.</p>	<p>Indicators of Success have been added to the implementation plan. Additional quantifiable impact metrics will be developed as the program roles out best practices, tools, and resources and develops methodologies for measurement and data collection. Performance tracking methods will be defined in the <u>Accountability Framework</u>.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>In order to fully address racial and any other equity issues, it is important to approach DEIJ with this holistic view. The CBP should use additional metrics, as outlined in the Diversity Statement, as indicators of achieving diversity goals in order to ensure full implementation of DEIJ principles.</p>	<p>The bi-annual diversity survey is set to go out in 2022, and a more comprehensive study should be scheduled within a reasonable timeframe after the implementation plan is approved and begins work. We would like to improve the diversity survey to reflect a more inclusive definition of "underrepresented" the next time it goes out.</p>

<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>In order to accurately measure and assess any staffing changes and to provide a benchmark for continued progress moving forward, CBP should conduct another comprehensive diversity survey. This knowledge is critical to many of the components outlined in the DEIJ Strategy Implementation Plan and is connected to many recommendations included in this letter.</p>	<p>The bi-annual diversity survey is set to go out in 2022, and a more comprehensive study should be scheduled within a reasonable timeframe after the implementation plan is approved and begins work. We would like to improve the diversity survey to reflect a more inclusive definition of "underrepresented" the next time it goes out.</p>
<p>DEIJ Goals, Accountability, Metrics, Tracking Progress</p>	<p>General</p>	<p>It is difficult for the undersigned to fully comment on the DEIJ Strategy Implementation Plan given the absence of related actions, metrics and firm timelines for each subtask. Without them, the document only contains goals with no way to execute them or track their progress. While the timeframe for each action is presented in broad terms, for many actions, especially those listed as ongoing, more explicit bounds are necessary to fully ensure accountability on implementing these actions.</p>	<p>Related actions have been indicated for each action and subtask. Indicators of Success have been added to the implementation plan for each of the eight objectives. Performance tracking methods, including a plan for identifying additional quantifiable metrics, and a plan to ensure ownership and accountability for implementation will be defined further in the Accountability Framework. Timeframes were established to communicate priorities, sequencing of activities, and desired completion dates. Timeframes were selected over specific due dates to provide flexibility and to account for uncertainty. Definitions for timeframes are provided under Appendix B. As we finalize the implementation plan, we are identifying foundational, high-priority items that will help advance the other tasks identified in the plan. These priorities will be conveyed in the Action Team's recommendations to the PSC and the EC as we seek their endorsement of the plan. A more detailed timeline and sequencing of activities will be developed by the DEIJ Coordinator once they are on board.</p>

Funding	Focus Area 3: Advancing DEIJ through Watershed- related Work	3.1bs1 - Establish a system for tracking funding allocations in the short term.	Added language to emphasize the development of a tracking system and adding the timeframe as short-term.
Funding	General	Weaknesses: The plan does not capture the control of resources both funding and staffing for CBP and between states and partners. Some of the tasks require time and resources of volunteer entities and/or the redirection of	Edits have been made to actions related to funding to capture more closely the flow of resources and scope of funding decisions.
Funding	Focus Area 2: Advancing DEIJ Internally	4. Section 2.4b: There are significant financial resources available. Should not tie the ability to meet the goals of this implementation plan to additional resources.	Modified Action 2.4 to read "Identify existing funding and seek additional funding <i>as needed</i> for implementing action priorities of the DEIJ Strategy"
Funding	Focus Area 2: Advancing DEIJ Internally	We appreciate that Action 2.4.b Subtask 1 is targeted at establishing a list of funding priorities and outcomes for each entity within the CBP related to DEIJ, and Action 2.4.b Subtask 2 which will identify funding and resource gathering strategies and opportunities and advocate for funding priorities in upcoming FY budget. We emphasize the importance of this, and express priority emphasis here to ensure this task is completed expeditiously	Timeframe updated to reflect annual action, starting in the current FY.
Funding	Focus Area 2: Advancing DEIJ Internally	funding could be leveraged (this is not an exhaustive list): All work completed by the Diversity Workgroup, of which many participants are not compensated for their time contributed, but play an outsized role in the implementation of this strategy.	Action 2.1.b: Since this focus group and feedback gathering would be targeted to staff members, clarified that these individuals should be allocated time to provide feedback "on the clock". Action 2.2.b- Added statements to both subtasks to ensure that individuals who are appointed or who provide feedback are adequately compensated for their time.

Funding	Focus Area 2: Advancing DEIJ Internally	Action 2.1.b Subtask 1 description: ‘...hold a focus group to gather feedback ... ensure that this process elevates voices of those traditionally underrepresented groups’. Focus group members should be compensated for their time and knowledge.	Action 2.1.b: Since this focus group and feedback gathering would be targeted to staff members, clarified that these individuals should be allocated time to provide feedback "on the clock". Action 2.2.b- Added statements to both subtasks to ensure that individuals who are appointed or who provide feedback are adequately compensated for their time.
Funding	Focus Area 2: Advancing DEIJ Internally	Action 2.1.b Subtask 2 note: ‘maintain continuous feedback process to hear and act on voices of staff of color around the issue of inclusion and diversity’. Those providing feedback and sharing their experience as staff of color on issues of inclusion and diversity should be compensated for their time and knowledge.	Action 2.1.b: Since this focus group and feedback gathering would be targeted to staff members, clarified that these individuals should be allocated time to provide feedback "on the clock". Action 2.2.b- Added statements to both subtasks to ensure that individuals who are appointed or who provide feedback are adequately compensated for their time.
Funding	Focus Area 3: Advancing DEIJ through Watershed-related Work	We also support CBP’s plan to review grant making procedures and to adjust the current cooperative agreement guidance to include DEIJ language and considerations.	This is a note of support. No additional action is necessary.
Funding	Focus Area 3: Advancing DEIJ through Watershed-related Work	Action 3.4.a-c: Allow and/or encourage expanded grant time frames. To move the needle on equity, one year of funding is performative rather than powerful.	Added language to the grants section to state that the guidelines should take these factors into consideration

<p>Funding</p>	<p>Focus Area 3: Advancing DEIJ through Watershed- related Work</p>	<p>Action 3.4.a-c: Require grant administrators to request equity information of grantees and sub-awardees. Examples include an organization’s diversity statement, the makeup of their board/steering committee, what percentage of an annual budget is dedicated to equity measures, or a comparative chart of how leaders of color are paid as compared to white leaders.</p>	<p>Added language to the grants section to state that the guidelines should take these factors into consideration</p>
<p>Funding</p>	<p>Focus Area 3: Advancing DEIJ through Watershed- related Work</p>	<p>Action 3.4.a-c: Reporting requirements and supplemental documentation should not be excessive or place an undue burden on recipients, especially for grants related to DEIJ work.</p>	<p>Added language to the grants section to state that the guidelines should take these factors into consideration</p>
<p>Funding</p>	<p>Focus Area 3: Advancing DEIJ through Watershed- related Work</p>	<p>Action 3.4.a-c: Review non-federal match requirements, especially those that require a one-to-one match. Marginalized populations are often located in low income communities that lack discretionary funds and cannot afford the required non-federal match. The Bay Program needs to offer distribution of funds and resources more equitably by taking into account a communities’ capacity to provide non-federal match including local cash contributions and unpaid in-kind labor.</p>	<p>Added language to the grants section to state that the guidelines should take these factors into consideration</p>
<p>General</p>	<p>Definitions</p>	<p>Definitions: Overall, having a definitions section is quite useful. There are typos “underresneted” and “overburdened” that must be corrected. Moreover, CBP should consider adding a short description of the D5 Coalition.</p>	<p>Typos have been corrected. A link to the D5 Coalition website, where additional information about the group can be obtained, is provided in the plan.</p>

General	Appendix	Appendix A: Include CBP since it is a very commonly used abbreviation throughout. Define semi-annual.	Added definition for "CBP" to Appendix A. "Semi-annual" is defined under Appendix B.
General	Definitions	Review for missing frequently used terms and abbreviations in the plan such as GITs and PSC	The implementation plan has been reviewed for frequently used terms. Definitions for terms and abbreviations that occur frequently are located in Appendix A.
General	Focus Area 2: Advancing DEIJ Internally	Recommendation: eliminate subtask 2-6	We eliminated subtask 2 but retained the other subtasks as they were unique tasks to be completed.
General	Focus Area 4: Advancing DEIJ Performance of Partners	Action 4: These are generally good actions but should be evaluated for redundancy with others	The scope of these actions focuses on supporting the efforts of partner organizations to advance DEIJ within their organizations rather than within specifically the CBP partnership organization (e.g., GITs and workgroups)
Inclusion, Outreach, and Engagement	General	Establish and/or clearly outline the parameters/criteria for meaningful relationships with community organizations to ensure that leaders of organizations run by and primarily serving communities of color are not undermined or exploited.	Added Action 3.3.a subtask 2, "Establish and/or clearly outline the carteria for meaningful relationships with community organizations to ensure that leaders of organizations run by and primarily serving underrepresented communities are not undermined or exploited." Where outreach/engagement with underrepresented communities is explicitly noted as an action or could occur as a result of an action, a note has been added to use criteria that has been established for meaningful relationships with community organizations, and the Jemez Principles have been added as a resource.
Inclusion, Outreach, and Engagement	Focus Area 1: Strengthening CBP's Authorizing Environment	1.3s1 - Establish and/or clearly outline the parameters/criteria for meaningful relationships with community organizations.	Added as a related action for 1.3s1

Inclusion, Outreach, and Engagement	Focus Area 2: Advancing DEIJ Internally	2.2as2 - Establish protocol for community feedback on the list of organizations and groups and community engagement resources.	Added further context to ensure these materials are regularly updated with input from partners and community organizations
Inclusion, Outreach, and Engagement	Focus Area 2: Advancing DEIJ Internally	2.2as3 - Ensure outreach materials developed are accessible for those with relevant disabilities.	Added this to 2.2as3
Inclusion, Outreach, and Engagement	Focus Area 2: Advancing DEIJ Internally	2.3c - Consider hosting community events while hiring community experts in ej related topics.	Hosting community events may be difficult at the CBP-level, but partners could be encouraged to do this. "Develop and regularly update a living reference list of DEIJ-related conferences, events and community experts in DEIJ, gathering information from across CBP. Disseminate list and encourage partners to use it and add to it."
Inclusion, Outreach, and Engagement	Focus Area 3: Advancing DEIJ through Watershed-related Work	3.1 - Consider choosing one term for the target communities.	Substituted "people of color and other underrepresented communities" with "underrepresented communities" throughout plan, as this is a more inclusive definition of diversity. Where action is specifically directed to a smaller subset of "underrepresented" people, specific term (e.g., People of Color, BIPOC, Tribe) is used.
Inclusion, Outreach, and Engagement	Focus Area 3: Advancing DEIJ through Watershed-related Work	3.2bs2 - Consider choosing one term for the target communities.	Substituted "people of color and other underrepresented communities" with "underrepresented communities" throughout plan, as this is a more inclusive definition of diversity. Where action is specifically directed to a smaller subset of "underrepresented" people, specific term (e.g., People of Color, BIPOC, Tribe) is used.



Inclusion, Outreach, and Engagement	Focus Area 3: Advancing DEIJ through Watershed-related Work	3.4cs3 - Establish standards and/or thresholds for minimal outreach and response.	Added language to subtask that "minimum thresholds for outreach and response must be met for recommendations to move forward".
Inclusion, Outreach, and Engagement	Focus Area 3: Advancing DEIJ through Watershed-related Work	3.4d - Hire community leaders and experts for these events.	Added note to tasks to "consider hiring community leaders and experts to help organize and run these events."
Inclusion, Outreach, and Engagement	Focus Area 3: Advancing DEIJ through Watershed-related Work	3.5as2 - Include braille and audio options online to ensure that inclusive = accessible.	Included text in subtask to include "braille and audio as possible".
Inclusion, Outreach, and Engagement	Focus Area 2: Advancing DEIJ Internally	Recommendation: Tune these tasks to recommend that partner agencies determine how implementation partners are engaging with EJ communities and support effective evaluation of these engagement efforts.	In 2.1.a.s2 clarified that these efforts could extend both to partner agencies and to implementation partners.
Inclusion, Outreach, and Engagement	Focus Area 3: Advancing DEIJ through Watershed-related Work	Action 3.5.b. It is not clear who the audience is for these tools--presumably it is the implementing partners or specifically the EJ communities?	Added "for CBP partners" to the action description.

Inclusion, Outreach, and Engagement	General	Communications Support: Ensure that teams work with the CBP Communications Workgroup and Communications Office at the start of projects so communications products are well-defined and developed appropriately to achieve our DEIJ objectives, including being translated whenever necessary	Added note to Action 3.3.a subtask 3: "Ensure that partnership bodies work with DEIJ Coordinator, CBP Communications Workgroup and Communications Team at the start of efforts so that communications products are well-defined and developed appropriately to achieve DEIJ goals. "
Inclusion, Outreach, and Engagement	Focus Area 2: Advancing DEIJ Internally	2. Section 2.1.b: Recommend limiting to the term "underrepresented groups" without calling out people of color specifically as they are included within the definition. Sets up a hierarchy of the "underrepresented" which could create its own set of problems like being seen as in opposition to the "inclusive" environment we are trying to establish.	Removed reference to people of color specifically and left "historically underrepresented groups" in this section.
Inclusion, Outreach, and Engagement	Focus Area 3: Advancing DEIJ through Watershed-related Work	5. Section 3.2: Illustrates the point about the dangers of including one group over another. Now we have added "low income" and "tribes" (in parentheses which makes it seem like an afterthought).	Substituted "people of color and other underrepresented communities" with "underrepresented communities" throughout plan, as this is a more inclusive definition of diversity. Where action is specifically directed to a smaller subset of "underrepresented" people, specific term (e.g., People of Color, BIPOC, Tribe) is used.
Inclusion, Outreach, and Engagement	Focus Area 3: Advancing DEIJ through Watershed-related Work	7. Section 3.5: Recommend including translation services (as appropriate)--both for meetings and in print--to ensure that we meaningfully reach non-native speakers.	Added note to subtask indicating recommendation to include translation services, as appropriate

<p>Inclusion, Outreach, and Engagement</p>	<p>General</p>	<p>And I just saw your advertisement that your initiative to for diversity and inclusion with a Chesapeake Bay Mission and I just thought that any Outreach you can do to. What some of the social programs they have is like for. Drug abuse and maybe just even Mental Health. So units they have just maybe do some kind of a maybe Outreach to some of those people who may need just a different view of getting outside and actually like they they'll helping with a task. Not just going to view the Beautiful the beauty of being outside in Chesapeake Bay Area, but along the whole theory about actually having a task to do but the mental health and also drug abuse any of those young people come to please try to reach them give them a purpose and something to focus in on that's my suggestion. Thank you</p>	<p>We appreciate receiving this comment. It is an important reminder of the many levels of impact Chesapeake Bay restoration work can have on a community and of the partnership's central goal to support healthy, thriving Chesapeake Bay communities. A note has been added to Action 3.3b.s2: "Consider the intersectionality of CBP implementation work with other community efforts and the potential benefits provided to communities, such as through job growth and training, improved public health, and youth empowerment."</p>
<p>Inclusion, Outreach, and Engagement</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>It was noted that the EPA/DSU L.E.A.P. partnership can be included as an existing partnership between the CBP/EPA and a historically black college/university (HBCU). Details on this agreement are attached to this email</p>	<p>Added Delaware State University to the Note on 2.1.cs6</p>

<p>Inclusion, Outreach, and Engagement</p>	<p>General</p>	<p>Throughout the implementation plan, there are multiple subtasks that advise gathering input and feedback from individuals and communities that have been historically underrepresented. Before CBP takes this leap, it is imperative that the Partnership makes an investment to understand its own history working with environmental justice communities and any harm that has occurred within these relationships. When seeking the personal knowledge, experience, expertise, time, and attention of individuals, the CBP should also consider options for compensation for this information.</p>	<p>Added action 3.3.s2 to "Establish and/or clearly outline the criteria and best practices for meaningful relationships with community organizations to ensure that leaders of organizations run by and primarily serving underrepresented communities are not undermined or exploited." Where outreach/engagement with underrepresented communities is explicitly noted as an action or could occur as a result of an action, a note has been added to refer to the Jemez Principles. Where appropriate, added statements to actions to ensure that individuals who are appointed or who provide feedback are adequately compensated for their time.</p>
<p>Inclusion, Outreach, and Engagement</p>	<p>Focus Area 2: Advancing DEIJ Internally</p>	<p>Action 2.2.a: Subtask 2 status indicates that the Diversity Workgroup has compiled a current list of organizations and groups led by and/or serving underrepresented communities as well as a set of community engagement resources. We ask that this list is consistently updated with more accurate information, and expanded as connections deepen in communities and you become aware of more organizations operating in this space that you may not have been aware of prior. Also consider speaking with community leaders to ensure this list is comprehensive, if that has not already been done.</p>	<p>Added a note to ensure these materials are regularly updated with input from partners and community organizations.</p>

<p>Inclusion, Outreach, and Engagement</p>	<p>General</p>	<p>It is important to move at the speed of trust when engaging new communities and those that have been marginalized. CPB should refer to the Jemez Principles when building authentic relationships and developing shared goals that result in mutual benefit with those most impacted by environmental harm.</p>	<p>Added action 3.3.s2 to "Establish and/or clearly outline the criteria and best practices for meaningful relationships with community organizations to ensure that leaders of organizations run by and primarily serving underrepresented communities are not undermined or exploited." Where outreach/engagement with underrepresented communities is explicitly noted as an action or could occur as a result of an action, a note has been added to refer to the Jemez Principles. Where appropriate, added statements to actions to ensure that individuals who are appointed or who provide feedback are adequately compensated for their time.</p>
<p>Inclusion, Outreach, and Engagement</p>	<p>General</p>	<p>Engagement should also not be a one off experience. In order to create meaningful change, CBP should continue working with community members to identify community needs and mutual interest and benefits, rather than imposing outside goals regarding outreach in the DEIJ Strategy Implementation Plan. When working with communities to develop shared goals, the CPB should allow space for community collaboration, and room for debate and negotiation. As stated above, CBP should also consider options for compensation when utilizing information and expertise from marginalized communities.</p>	<p>Created action 3.3.s2 to "Establish and/or clearly outline the criteria and best practices for meaningful relationships with community organizations to ensure that leaders of organizations run by and primarily serving underrepresented communities are not undermined or exploited." Where outreach/engagement with underrepresented communities is explicitly noted as an action or could occur as a result of an action, a note has been added to refer to the Jemez Principles. Where appropriate, added statements to actions to ensure that individuals who are appointed or who provide feedback are adequately compensated for their time.</p>

<p>Inclusion, Outreach, and Engagement</p>	<p>Focus Area 3: Advancing DEIJ through Watershed-related Work</p>	<p>Action 3.2.b: Use the Chesapeake Bay Environmental Justice and Equity Dashboard as a tool to identify, prioritize, and promote under-resourced and under-engaged communities around the watershed in order to identify priority funding opportunities.</p>	<p>Added note under Action 3.5b. subtask 2 to promote to funding programs the use of Chesapeake Bay Environmental Justice and Equity Dashboard as a tool to identify, prioritize, and promote under-resourced and under-engaged communities around the watershed in order to identify priority funding opportunities.</p>
<p>Inclusion, Outreach, and Engagement</p>	<p>Focus Area 3: Advancing DEIJ through Watershed-related Work</p>	<p>Action 3.2.c: When producing content that tells the stories of organizations doing EJ work, funding for knowledge sharing should be considered.</p>	<p>Added note to subtask that "When producing content that tells the stories of organizations doing EJ work, funding for knowledge sharing should be considered".</p>
<p>Inclusion, Outreach, and Engagement, Funding</p>	<p>Focus Area 3: Advancing DEIJ through Watershed-related Work</p>	<p>Action 3.4.a-c: Allow and/or encourage investment in outreach. Grantmakers often do not fund outreach positions, something that is critical to equity work.</p>	<p>Added language to the grants section to state that the guidelines should take these factors into consideration.</p>

This summary reflects comments from:

Choose Clean Water Coalition

State of Maryland

NOAA Chesapeake Bay Office

Center for Community Engagement, Environmental Justice and Health

Delaware Department of Natural Resources and Environmental Control

Residents (2)