



Citizens Advisory Committee

TO THE CHESAPEAKE EXECUTIVE COUNCIL

CHAIR
Matthew Ehrhart
Pennsylvania

VICE CHAIR
Julie Lawson
Washington, DC

Meg Bradshaw
Washington, DC

Chante' Coleman
Maryland

John Dawes
Pennsylvania

Andrew Der
Maryland

Bill Dickinson
Virginia

William Fink
Pennsylvania

Dale Gardner
Virginia

Verna Harrison
Maryland

Charles Herrick
Washington, DC

Ann Jurczyk
Virginia

Patricia Levin
Pennsylvania

David Lillard
West Virginia

Mike Lovegreen
New York

Joseph Maroon
Virginia

Bill Matuszeski
Washington, DC

Jorge Ribas
Maryland

Charlie Stek
Maryland

Kendall Tyree
Virginia

October 25, 2019

Transmitted Via Email

Dear Dinorah Dalmasy and James Davis-Martin,
Water Quality Goal Implementation Team, Co-Chairs

Diane McNally, Region 3 EPA, Milestones Workgroup Chair,

Dear Dinorah, James and Diane,

As a follow-up to the discussion from the October 17, 2019 Management Board meeting and on behalf of the Citizens Advisory Committee please accept this letter as documentation of our concern and comments on the implications of eliminating the numeric commitments from the two year milestones. We believe numeric commitments support (1) intermittent ability for adaptive management and political accountability for each source sector, and (2) more transparency and stakeholder understanding on short term progress so the public can encourage financial/legislative support for accelerated action.

We also believe continuing numeric commitments aligns with the original intent of the two year milestones as stated in the November 4 2009 *EPA Letter to PSC Outlining EPA's Expectations for Watershed Implementation Plans*, "EPA expects that the States and the District will identify and commit to implement specific pollutant reduction controls and actions in each of their successive two-year milestones...EPA expects that the Watershed Implementation Plans and two-year milestones will contain greater source sector and geographical load reduction specificity, more rigorous assurances that load reductions will be achieved, and more detailed and transparent reporting to the public than past Bay restoration efforts".

Numeric two-milestones also support the Bay Program partnership's Accountability Framework as stated in the Dec 29, 2009 *EPA Letter to PSC on the Chesapeake Bay Accountability Framework and Federal Actions*, under the section entitled Assessing and Evaluating Progress and Building a Transparent Accountability System, "EPA will also monitor whether a jurisdiction has implemented point and nonpoint source controls to meet the basin-jurisdiction loading targets identified in its two-year milestones".

Lastly, the partnership has recognized the co-benefits of BMPs, especially the practices where progress lags far behind like forest buffers and wetlands. Numeric BMP commitments is a critical way to track these BMPs that support, "local water quality benefits, as well as economic and ecosystem service benefits generated from restoration activities" as stated in EPA's Expectations for the Phase III Watershed Implementation Plans.



Chesapeake Bay Program
A Watershed Partnership

Jessica M. Blackburn, CAC Coordinator
612 Hull Street, Suite 101C | Richmond, VA 23224 | (804)775-0953 | jblackburn@allianceforthebay.org |



If the decision is made that a change is necessary to relieve confusion about the milestone schedule or to relieve administrative reporting burden, the CAC recommends you look at alternatives such as aligning the reporting deadlines for the numeric and programmatic commitments or selecting the priority BMP numeric commitments that are critical to achieving the jurisdiction's WIP in each source sector. Thank you for the opportunity to provide advice on this important partnership decision. CAC is certainly willing to review and comment on any subsequent proposal that comes forward.

Sincerely,



Matthew Ehrhart
Chair, Citizens' Advisory Committee

cc: Dana Aunkst, Director, EPA Chesapeake Bay Program
Jim Edward, Deputy Director, EPA Chesapeake Bay Program



Jessica M. Blackburn, CAC Coordinator
612 Hull Street, Suite 101C | Richmond, VA 23224 | (804)775-0953 | jblackburn@allianceforthebay.org |

