



Joan Salvati, Co-chair  
Lisa Schaefer, Co-chair  
Local Area Targets Task Force

**Re: Local Area Targets should be required in Phase 3 Watershed Implementation Plans**

Dear Local Area Targets Task Force Co-chairs:

The undersigned members of the Choose Clean Water Coalition strongly support the development of Local Area Targets as an integral part of the Phase 3 Watershed Implementation Plans (WIPs). Restoration efforts needed to achieve the load reductions outlined in the Chesapeake Bay Total Maximum Daily Load (TMDL) require planning at many different scales and must incorporate sectors with varying levels of regulatory requirements.

States have already made substantial efforts to outline state-level reductions in nutrient and sediment in their Watershed Implementation Plans (WIPs). These state-level plans have been a critical step towards achieving these goals. In some instances, there has also been a substantial effort to document plans at the local level. However, there is a tremendous amount of planning work that still needs to occur at the local level, particularly related to agriculture and non-MS4 stormwater. We strongly believe there is a need for, and value in, translating these restoration goals down to the local level using local area targets. Most of our members operate at the local level and having a clear target by which to measure progress is critical for garnering public support and resources and prioritizing efforts.

Maryland uniquely issued local targets at the county scale during the Phase 2 WIP process. These local-scale goals provided counties and towns with a clear picture of the jurisdiction's impact on the Bay system and the level of effort that would be sufficient to meet regional cleanup goals. Local targets were instrumental in the development of county Phase 2 WIP plans, which brought stakeholders together, assessed technical assistance needs at the local level, and often identified hidden opportunities to reduce pollution at low cost.

Since then, a number of towns and counties have leveraged this planning work to develop policies and funding commitments pursuant to local targets. Talbot County has embarked on a targeted roadside ditch enhancement program and invested several hundred thousand dollars in the effort, specifically to help meet the county's local target. Elsewhere, Queen Anne's County and Wicomico County have each set aside substantial capital funding dedicated to local WIP implementation. The City of Salisbury and the towns of Oxford and Berlin have adopted stormwater utilities to fund, in part, Best Management Practices for water quality. A number of other jurisdictions are working to develop detailed watershed management plans that will include project lists prioritized to help meet local targets. In each of these cases, local targets have given county staff and elected officials the context they need to make policy and program decisions that support regional cleanup efforts.

In other states, local governments already undertake voluntary efforts such as completing local restoration projects, addressing septic tank issues, and establishing and promoting living shorelines. They also promote Best Management Practices to residents and highlight financial assistance programs such as the Virginia Conservation and Assurances Program, Virginia Clean Water Revolving

Loan Fund, and Chesapeake Bay Implementation Grants. Local Area Targets provide a pathway to describe how these efforts are part of a broader, statewide need and the targets help characterize progress. This capacity will provide an opportunity for local government and local partners to further leverage financial assistance through grant programs and generate other forms of local and regional support.

While these efforts may not be abundantly common, they are already occurring to some extent without Local Area Targets. For instance, in Virginia, several localities (Town of Kilmarnock, Goochland County, Prince George County) have been awarded grants through the Stormwater Local Assistance Fund to reduce nutrient loads. Local Area Targets will help promote voluntary restoration work in unregulated localities and unregulated portions of regulated localities which is a critical remaining obstacle to achieving the necessary pollution reductions throughout the Chesapeake Bay watershed.

We recommend that the Local Area Targets Task Force conclude that Phase 3 Watershed Implementation Plans should require Local Area Targets across the entire Chesapeake Bay Watershed. We also recommend that these targets should be directly tied to numeric load reductions consistent with the Bay TMDL. We appreciate the opportunity to provide these comments and ask that you please share them with the entire Local Area Targets Task Force. As stakeholders with a keen interest and role in implementing the WIPs, we would welcome the opportunity to be more fully engaged in the discussion about how to most effectively develop these targets so they are useful planning tools.

Sincerely,

Anacostia Watershed Society

Maryland Conservation Council

Blue Water Baltimore

Maryland League of Conservation Voters

Center for Progressive Reform

Middle Susquehanna Riverkeeper

Chesapeake Bay Foundation

National Wildlife Federation

Delaware Nature Society

Natural Resources Defense Council

Friends of Accotink Creek

New York League of Conservation Voters

Friends of Lower Beaverdam Creek

PennFuture

Friends of the Middle River

Pennsylvania Council of Churches

Friends of the Rappahannock

Potomac Conservancy

Interfaith Partners for the Chesapeake

Potomac Riverkeeper

James River Association

Potomac Riverkeeper Network

Lackawanna River Conservation Association

Rock Creek Conservancy

Maryland Academy of Science

Savage River Watershed Association

Severn River Association

Shenandoah Riverkeeper

Shenandoah Valley Network

Upper Potomac Riverkeeper

Virginia Conservation Network

Waterkeepers Chesapeake

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