

August 21, 2023

Chesapeake Bay Program 1750 Forest Drive, Suite 130 Annapolis, MD 21401

RE: Charting a Course to 2025

To Chesapeake Bay Program leadership and partners,

Thank you for the opportunity to comment on *Charting a Course to 2025: A Report and Recommendations for the Chesapeake Executive Council on How to Best Address and Integrate New Science and Restoration Strategies Leading Up to 2025.* Public involvement is an indispensable component in accelerating the progress of the Watershed Agreement outcomes.

The Chesapeake Conservation Partnership (CCP) is a coalition of more than 85 partner organizations working at every level within the watershed to extend the conservation of culturally and ecologically important landscapes to benefit a vibrant, healthy, and sustainable quality of life for the Chesapeake region. CCP provides a forum to advance conservation through collaborative efforts, networking, influencing policy and funding, and sharing best practices. It works to build the financial, scientific, social, and policy capacity to achieve both short-term and long-term landscape conservation goals and to support the partners in carrying out specific land protection actions.

The Charting a Course to 2025 report recommends focusing on nonpoint source pollution and prioritizing targets for forest buffers and wetlands as crucial to meeting the water quality goals. It also outlines the importance of using data to inform our decisions and considering climate change across all of our work, while recognizing the need to more effectively advance diversity, equity, inclusion and justice. We, the undersigned members of the CCP Steering Committee, wholeheartedly agree with these recommendations. We see conservation across the landscape as a key vehicle in charting a course toward these goals, as measures taken on the land significantly affect the water. As such, the undersigned members of the CCP Steering Committee recommend highlighting the importance of land conservation to meet many of the goals set in the Watershed Agreement in the report. Consider adding a high-level recommendation to the beginning of the report that elevates conservation as a key priority. For example: "Prioritize the conservation of existing forests and natural areas. These lands are our most valuable assets for meeting water quality, habitat, and climate resilience goals." Please add voluntary permanent land conservation as a recurring recommendation integrated throughout the Charting a Course document. This improvement would position us for success as we look beyond 2025. In addition, we recommend the following specific examples of language edits:

- Please add an observation on Page 5 under 'Outcome Attainability' stating that land use planning and permanent land conservation are effective ways to ensure durable, long-lasting advancement in Bay goals.
- Please add an additional action to the recommended actions to take over the next two years on Page 13 under the Chesapeake Bay TMDL & Phase III WIPs: Explore increased focus on permanent land conservation and a focus on land use that supports permanently protected natural filters as a durable avenue to achieve Chesapeake Bay TMDLs and Phase III WIP goals.



Please add an additional recommendation on Page 24 under 'Accelerate Progress to 2025' for
the 'Forest Buffers and Wetlands' section of the report to focus investments and resources into
permanent land conservation of land where there are existing wetlands and forest buffers as
well as areas that have the hydrology and proximity to become wetlands and forest buffers.

The Executive Council Charge to the Principals' Staff Committee: Charting a Course to 2025 and Beyond outlines science, restoration, and partnership as three foundational considerations. We urge the PSC to add a fourth foundational consideration: land conservation. Permanent land protection should be foundational to the Bay Program's efforts as we look to 2025 and beyond. The undersigned members of the Chesapeake Conservation Partnership ask the Chesapeake Bay Program to elevate land conservation to serve as a main pillar in the Bay Agreement alongside science, restoration and partnership.

In its recent report, "Achieving Water Quality Goals in the Chesapeake Bay: A Comprehensive Evaluation of System Response" (CESR), the Scientific and Technical Advisory Committee noted that "the Bay system faces permanent and ongoing changes in land use, climate change, population growth, and economic development that will challenge notions of restoration based on recreating historical conditions. ...Opportunities to meet these challenges exist but efforts require changes and new approaches to implementation, planning, and decision-making." The report focuses efforts for the future on non-point source pollution and shallow water habitats, including the land and water interface, which tend to be where the people are.

The CESR Report, suggests shifting the emphasis of science and monitoring from tracking water quality standards attainment in the deep trenches of the Bay, to focusing on improving conditions in culturally, ecologically, and economically important places in the watershed with an increased focus on shallowwater areas. Permanent land conservation is fundamental and the most direct way to save these ecologically and economically important places. Without conservation, any restoration of lands can be fleeting.

The Charting a Course to 2025 report notes that "the achievement of the forest buffers and wetlands outcomes are critical to meeting the Bay Program's water quality goals... In fact, 10% of planned nitrogen reductions are estimated to come from forest buffer plantings alone." However, it also states that "while progress shows that wetlands are being restored and created across the watershed, the total acres of wetlands are also decreasing due to land subsidence, climate change and development pressures." Here is one example of many where prioritizing conservation can help ensure that the benefits of restoration efforts will endure over the long term. We would recommend raising the issue of land use conversion as an emerging threat for both wetlands and forest buffers and adding a recommendation to prioritize the conservation of forest buffers and wetlands to protect the investments we are making in restoring these critical habitats.

Land use change, development and growth have far-reaching effects on the Bay efforts and exacerbate the impacts of climate change. Thanks in part to the efforts of Chesapeake Bay Program partners, the rate of loss has fallen, but the Chesapeake Bay Watershed still loses 70 acres of forested land a day. The greatest threat is the oftentimes permanent loss of forest and other natural lands to development. These existing mature forests and natural lands are the most valuable assets we have for meeting the Partnership's water quality, habitat and climate resilience goals. In addition to conserving these high-



quality lands, to ensure return investments in restoration, we must protect what we have restored. Finding suitable sites for restoration activities can be challenging particularly given access and ownership restrictions. However, land trusts and land conservation programs, including agricultural land protection programs, are vital means to reach landowners who have the opportunity to improve the stewardship of their lands, including already protected lands, by installing water quality best management practices.

Land cleans our water and air, grows our food, and holds the special places where we live, work, play, and find solace. Land conservation will maintain water quality and habitat as well as sustain working forests, farms and communities throughout the Chesapeake Bay Watershed. Natural land cover such as forests, wetlands and natural grasslands support natural hydrology and flow patterns, which help maintain healthy aquatic habitats and communities. Wetlands, riparian buffers and forests can trap and filter sediments, nutrients, and chemicals from surface runoff and shallow groundwater. They stabilize the streambanks, mitigate floods, and can increase the water's ability to hold oxygen and support life while improving the biological diversity of surrounding areas. Birds, mammals, and other animals find the food, cover, water, and nesting sites they need, as well as corridors and pathways for movement between areas. Forests intercept harmful air particulates and absorb noxious gasses such as sulfur dioxide. They are important carbon sequestration and storage systems in the fight to mitigate climate change; every acre of forest saved sequesters enough carbon dioxide to equal the annual emissions of over fifty cars. The Chesapeake Bay Program already does have some focus on permanent conservation through its Protected Lands Outcome. However, given the far-reaching effects of permanent conservation on the region, we recommend that an element of permanent protection should be identified in every outcome where possible. While the 'Protected Lands Outcome' is on course, more protection is needed to help get many of the other goals back on course.

The CCP joins the Chesapeake Bay Program in our shared mission of protecting two million additional acres beyond 2010 levels in the watershed by 2025. CCP members are instrumental to the progress made on the Protected Lands Outcome outlined in the report; we are on track to protect two million acres of lands throughout the watershed—currently identified as high-conservation priorities at the federal, state or local level. Additional emphasis is now placed by CCP and across the nation on conserving large forest tracts and wetland acres, as well as on working to exceed the original target by striving to protect 30% of the watershed by 2030, in line with the America the Beautiful Initiative as called for by both President Biden's Executive Order 14008, Tackling the Climate Crisis at Home and Abroad, and the Chesapeake Executive Council's Directive No. 21-1: Collective Action for Climate Change. Land use and the climate are inexorably linked, and conservation plays an important role in the global climate crisis. Even if we completely converted from fossil fuels to renewable sources, we would not avert many disastrous impacts of climate change unless we can permanently protect and restore ecosystems that store carbon and mitigate climate dangers.

Through the sustained joint efforts of the Chesapeake Bay Program and the Chesapeake Conservation Partnership, their partner agencies, nonprofits, and communities continue to expand public access to the Bay and its tributaries through existing and new local, state and federal parks, refuges, reserves, trails and partner sites. We must continue to strive for more than the protection and restoration of these places but also ensure all people from all backgrounds and abilities can equitably access the watershed. Improving access to our waterways and green spaces allows more people to reap the benefits that the watershed can provide in terms of quality of life and local economies. Only then can we hope to engender the stewardship of the Bay we need to reach our shared goals. People protect



what they love. Conserving cherished, valued places throughout the watershed and making them equitably accessible are essential steps toward enlisting the aid of the watershed's residents, whose help we cannot do without – to support, vote for, participate in, and promote conservation.

Chesapeake Bay Program partners envision an environmentally and economically sustainable Chesapeake Bay watershed with clean water, abundant life, conserved lands, access to the water, a vibrant cultural heritage, and a diversity of engaged stakeholders. The CCP and its partners support this vision and agree that all parts of it are interconnected, reliant upon one another. We also must ensure that the gains we make are enduring. Permanent land conservation is a sustainable way to ensure that the progress we make stands the test of time. We must advance each goal aggressively as we approach 2025 and plan for our work in future years, and build on all stakeholders' great work and lessons learned to determine a more effective way forward.

Conserving, protecting, and restoring land and habitat for wildlife and improving public access are fundamental to the Bay Program goals. We ask that the Principals' Staff Committee, The Beyond 2025 Committee and the Chesapeake Bay Program as a whole integrate conservation as a foundational principle in our efforts to chart a course to 2025 and beyond.

Sincerely,

Members of the Chesapeake Conservation Partnership Steering Committee

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