

April 30, 2015

Via e-mail to agreement@chesapeakebay.net

Mr. Nicholas DiPasquale
Chair, Chesapeake Bay Program Management Board
410 Severn Avenue, Suite 109
Annapolis, MD 21403



RE: Citizen Stewardship Management Strategy Comments

Dear Mr. DiPasquale and Management Board Members:

The undersigned members of the Choose Clean Water Coalition—a coalition of organizations from Delaware, Maryland, New York, Pennsylvania, Virginia, West Virginia and the District of Columbia with the common goal of restoring the thousands of streams and rivers flowing to the Chesapeake Bay—respectfully submit the following comments on the draft Citizen Stewardship Management Strategy.

Members of the Choose Clean Water Coalition strongly support the Citizen Stewardship Management Strategy. The strategy focuses on increasing the number and diversity of trained and mobilized citizen volunteers with the knowledge and skills to enhance the health of their local watersheds. The comments below aim to strengthen the final strategy.

A. The Citizen Stewardship Strategy Should Retain and Continue to Focus on the Sound Behavior Index Mechanism.

The strategy introduces a sound behavior index, which is a value-added method used to track changes in attitudes, behaviors, and actions related to stewardship. It is important to measure long-term shifts in behaviors in order to give policymakers tools for targeting programs that will actually foster volunteerism and local engagement. The index also helps break down barriers to effective outreach.

The strategy includes a section of external factors that are obstacles to citizen stewardship. The first factor is how “public opinion, perception and attitude about Bay clean up varies” among citizens. The index directly addresses this barrier in several ways. For example, it assists in developing messaging regarding a particular issue to inform outreach programs, which are based on public perception data. In order to know and target an audience, you must first understand communication obstacles.

The sound behavior index used here should be modeled after the successful sound behavior index in the Puget Sound region. There, the Puget Sound Partnership implemented a sound behavior index study to determine day-to-day practices and behaviors that may harm Puget Sound. The study recognizes the importance of fostering beneficial behaviors and reducing harmful ones in order to reverse negative trends influenced by human actions. The survey is administered every two years to a scientifically selected sample of residents in order to measure behaviors that affect Puget Sound as well as social capital. Each region is given a score so that progress can be tracked over time. The Puget Sound Partnership is having success with this method, and it is possible to have similar success here in the Chesapeake Bay watershed.

The Coalition sees great benefit in implementing a long-term sound behavior index regionally. We support continued funding, particularly at the state level, for the sound behavior index after

the pilot phase.

B. The Citizen Stewardship Strategy Should Build on the Emphasis of Local Government and Non-profit Partnerships Through Stormwater Permit Mandates.

There are several successful models of outreach programs formed by a partnership with local governments and non-profits. For example, the city of Norfolk, Virginia partnered with Elizabeth River Project on the “River Star Homes” program. Individuals and families sign up to be a “River Star Home” if they agree to seven simple things like reducing lawn fertilizer and not putting grease down their sink. Another great example is several partnerships that Montgomery County, Maryland has initiated to create and continue the “Rainscapes Program.” Partners include Neighbors of the Northwest Branch, Izaak Walton League, Friends of Sligo Creek, and Audubon Naturalist Society.

The Bay Program and citizen stewardship partners should support these partnerships through providing further guidance on how local governments can facilitate these partnerships. Further, a management approach should be added to encourage these partnerships by making them mandatory as part of MS4 permits.

This partnership mandate belongs in the MS4 permit because of the public participation aspect of the Clean Water Act. The Clean Water Act states, “Public participation in the development...of any...plan or program established by the [EPA] or any state...shall be...assisted by the [EPA] and the States.” 33 U.S.C. § 1251(e). To this point, the Court of Special Appeals of Maryland held that the Montgomery County MS4 Permit violated the Clean Water Act in part because the permit lacks opportunities for public participation. Maryland Department of the Environment, et al. v. Anacostia Riverkeeper, et al., Court of Special Appeals of Maryland, No. 2199, April 2, 2015. The Clean Water Act was built on the idea of public participation in the implementation of the act; therefore it is up to EPA and the states to ensure this happens.

With programs like the Watershed Stewards Academy, non-profits are ready and willing to help foster active citizen stewards. Partnerships for specific restoration services should be taken seriously. The Bay Program and state and local governments should see the benefit in and facilitate these partnerships.

C. The Bay Program Should Support Programs that Build Capacity at the Non-Profit Level.

The strategy correctly recognizes that as the number and diversity of citizen stewards increases, the non-profit organizations will need to build their capacity in order to maintain the engagement of those individuals. The Bay Program should support capacity building programs at the non-profit level in order to keep these stewards mobilized and able to make decisions about clean water policy.

We are happy to discuss our comments on the draft Citizen Stewardship Management Strategy further. Please contact Jill Witkowski by phone at 443-842-7525 or by email at witkowskij@nwf.org.

Respectfully submitted,

American Rivers
Anacostia Watershed Society
Audubon Naturalist Society
Blue Water Baltimore
Clean Water Action
Conservation Pennsylvania
Conservation Voters of Pennsylvania
Delaware Nature Society
Eastern Pennsylvania Coalition for Abandoned Mine Reclamation
Friends of the North Fork of the Shenandoah River
Friends of the Rappahannock
Izaak Walton League of America
Lackawanna River Corridor Association
Maryland Conservation Council
Maryland Sierra Club
Mid-Atlantic Council of Trout Unlimited
National Aquarium
National Parks Conservation Association
Nature Abounds
Neighbors of the Northwest Branch, Anacostia River
New York League of Conservation Voters
NWF Mid-Atlantic Regional Center
Penn Future
Potomac Riverkeeper Network
Rock Creek Conservancy
Sleepy Creek Watershed Association
South River Federation
St. Mary's River Watershed Association
Susquehanna Greenway Partnership
Trash Free Maryland
Virginia Conservation Network
Waterkeepers Chesapeake
West Virginia Rivers Coalition

