



FRIENDS of FREDERICK COUNTY

preserving our land, our water and our quality of life

REF: Draft Strategy for Protecting and Restoring the Chesapeake Bay

Friends of Frederick County, a not for profit organization that promotes environmental conservation, fair and open government, and active civic engagement in Frederick County, MD applauds the EPA and other partner agencies on this initiative and amplified focus to protect and restore the Chesapeake Bay and its watershed. We submit two general comments on the overall program, and several more specific observations and ideas below.

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We found the document to lack emphasis on two critical tenets to the programs success.

They are:

1. Greater emphasis on regulation and enforcement As we understand it, the strategy for the protection and restoration of the Bay is to amplify legislation and compliance on activities that affect the watershed. However in the draft document there is little talk of regulation and mechanisms/support for enforcement.
2. Formalization of local partner participation Success of the plan's goals is critically linked to the involvement and participation of local stakeholders. For that reason we encourage the Federal Leadership Committee to formally include county governments and local partners in their planning. We would urge you not to stop your support and attention at the state level; in the past we have witnessed local resistance to state input and programs. Local governments and organizations often have solid networks and working relationships to facilitate implementation and monitoring more effectively.

Additionally, we submit these specific observations and ideas for your consideration:

1. Consider a low impact development assistance program in Frederick County as an action agency initiative Population projections indicate that Frederick County will increase by about 4000 people /year for the next 20 years; we currently have over 23,000 dwelling units in the pipeline for construction, 4000 plus in Frederick City and many more in other municipal jurisdictions. Curbing urban and suburban run-off of nitrogen, phosphorus and sediments is a large problem for us and subsequently the Bay. What is necessary to for consideration as one of the “actions agencies initiatives ” (Part 3: Federal Initiatives, pg 47) to bring more attention to this critical problem and more assistance to address it through policy, low impact development programs, education and outreach.
2. Include regulation and enforcement ideas for keeping livestock out of streams in your conservation toolbox Frederick County has about 195,000 acres devoted to agriculture. The County’s largest agriculture sectors are dairy and livestock/poultry. The county is the State’s leading beef and dairy producer. In addition to problems related to runoff from manure in the fields, cows frequently enter the streams on some farms in Frederick County. Friends of Frederick County would like to see that all cows in Frederick County drink from troughs, so that cows are off stream banks and re-growth can occur facilitating riparian restoration. We welcome expertise on changing current practices and suggest that your “conservation toolbox” (Part 3 D) address this.
3. Increase attention and support to forest protection and management. With respect to forest land, the State and Federal governments should be allocating more funds for their protection and management. For example, in 2009, the State did not provide sufficient funding for gypsy moth protection and therefore some heavily infested areas did not get treated. Many areas that did get sprayed were done so at the expense of the citizens who own the land. Some areas did not get sprayed because of lack of citizen concern or funds. The only private pesticide applicators that were made available to private citizens used a pesticide that is not approved for use in aquatic areas. If we are to consider forests to be an important part of the Chesapeake Bay watershed then it is imperative that adequate State or Federal funding be made available for forest management.
4. Consider including policy and enforcement ideas for regulating pesticide/herbicide application in your conservation toolbox. The draft document does not address pesticide or herbicide applications on lawns or golf courses. This is a serious problem that must be addressed through regulation

and not just education or voluntary compliance.

5. Partner with non-profits already working on policy change that will help reach the Chesapeake Bay Program goals. For example, as part of your initiative to promote livable, sustainable communities we recommend collaboration with Transportation for Maryland as they push for policies and funding to satisfy human transportation needs, versus the automobile-centered system we currently have (http://www.friendsofmd.org/priority-issues/transportation-choices/t4md/t4md_handout_single.pdf/view). There may be similar citizen coalitions forming throughout the Chesapeake Bay.
6. Clarify regulations, allowances and their justifications for water usage from major shared rivers in the watershed. The Maryland Department of the Environment gives Water Appropriation and Use Permits for surface water withdrawals from the Potomac River. As a part of your inter-jurisdictional Baystat data collection, please consider that there may be additional demand for Potomac River water through new agreements or renewals – and subsequent environmental impacts, as there may be for other jurisdictions that share the Potomac River as a water source. Are the permitting restrictions for Potomac water use strict enough to protect the river's delicate natural balance?
7. Augment education on CAFOs Include in your education about CAFOs the benefits of grass-fed livestock: health of the animals, reductions of use of unnecessary antibiotics in the water, to carbon sequestration (<http://www.rodaleinstitute.org/Slocum/20090310>)
8. Launch county wide (succinct and targeted) campaigns that educate citizens on the consequences of non-compliance with the Chesapeake Bay Program goals, and how citizen participation is key. Land use in Frederick County determines the fate of the scenic Monocacy River, where there is a 41.4-mile long water trail ON the river but virtually little education on its banks about the hundreds of tributary streams that we affect daily and that affect the river's quality. Much could be done to develop a Monocacy River corridor that would engage the citizens in the watershed issues and help them understand their role in its conservation.

Thank you for your consideration of the issues described above.