

February 12, 2015

Molly Ward, Chair  
Principals' Staff Committee  
Office of the Secretary of Natural Resources  
1111 East Broad Street  
Richmond, VA 23219



Re: Insufficient Public Comment Period on Management Strategies

Dear Secretary Ward:

The Choose Clean Water Coalition, 200 organizations from Virginia, Maryland, Pennsylvania, New York, Delaware, West Virginia, and the District of Columbia, urges you to extend the public comment period on Chesapeake Watershed Agreement Management Strategies to 60 days and to post all current drafts on the Management Strategies Dashboard now so we may begin our review.

The Choose Clean Water Coalition was actively engaged in the development of the Chesapeake Watershed Agreement. We repeatedly noted that the Agreement's success would be determined by the robustness of the Management Strategies and pledged our participation in their development.

On October 8 2014, I participated in a meeting with other key stakeholders to provide feedback to the Chesapeake Bay Program on how to ensure meaningful public participation in the development of the Management Strategies. The stakeholders agreed that releasing all 25 of the Management Strategies at the same time for a 30 day comment period would not allow for meaningful public participation. The stakeholders also urged the Bay Program to post current drafts on the Management Strategies Dashboard as they were being developed so stakeholders could track the strategies' progress even if they could not attend all the meetings.

Neither of these suggestions critical to meaningful public participation has been implemented. Interested stakeholders will only have 30 days, beginning on March 16<sup>th</sup>, to comment on all 25 Management Strategies and the current drafts are not available on the Dashboard. Thirty days is not enough time for full-time advocates to comment on these strategies, let alone volunteers or other interested members of the public. The Agreement commits to: "***Operate with transparency*** in program decisions, policies, actions and progress to strengthen public confidence in our efforts," but the current public participation approach actually weakens public confidence in the Management Strategies.

I respectfully request that current drafts of the Management Strategies be made available immediately on the Management Strategies Dashboard and that the planned comment period be extended from 30 days to 60 days to allow interested stakeholders a reasonable opportunity to comment on the 25 Management Strategies. I look forward to receiving your response in writing soon so that I may report back to Coalition members regarding the resolution of this issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jill Witkowski".

Jill Witkowski  
Director

CC: Principals' Staff Committee Members