

Responses to General Comments Received on the Conowingo Watershed  
Implementation Plan Framework  
2/16/18

Commentor(s)	Comment	Drafting Committee Response
EPA	Suggested renaming the document to the "Framework for Developing the Conowingo WIP" since this is the framework and not the WIP itself.	Agreed and change made.
WV	Commented that the Bay TMDL (section 10.5) states PA, MD and NY's milestone delivered loads could be adjusted to address Conowingo's loss of trapping. Emphasizes the point that WV is not effective and does not expect the State will be required to undertake additional reductions for Conowingo.	Acknowledged.
MWCOG	Asked that a table of most effective basins be included in the Framework document.	Acknowledged but did not add the table because the information was either too detailed (by land-river segment) or too general (major basin) to be helpful for the purposes of the Framework. This info. can be received directly from the Bay program by interested parties.
EPA	Requested clarification on changing the Conowingo target's after MD's water quality certification is finalized.	Maryland will be working with the Chesapeake Bay Program to figure this out. Any pollution reduction practices put in place by Exelon will be quantified through input into the Bay model. Those reductions can be subtracted from the 6 million lb TN and .26 million pound TP with the remainder resulting in a new Conowingo target.
DE, VA, and WV	Either opposed or expressed concerns about taking money away from State WIP efforts to address Conowingo loads.	Acknowledged. The framework recommends that a financing strategy be developed by the third party awardee and Steering Committee that identifies initial sources of funding, as well as medium and longer range funding sources that can be phased in over time as necessary to achieve the Conowingo pollution reduction targets. The strategy will consider leveraging state, local and private dollars and in-kind services or technical resources as well as reallocation of existing federal funds to the jurisdictions for Chesapeake Bay restoration. EPA will work with the partnership to help ensure that any

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		reallocation of federal funds will not adversely impact state WIP efforts.
DC, DE	Need a better understanding of the total funding to implement the WIP and Exelon's role/contribution before committing to changes in CBIG or CBRAP funding. DC specifically commented that the Chesapeake Stewardship Fund is also federal and may be a better financing strategy, as well as new contributions by other federal partners (USFW).	Agreed and per above this will be further clarified through development of the financing strategy.
MWCOG	Suggested Conowingo WIP Framework and related materials should be publicly available for transparency.	Agreed and the materials will be posted on the CBP's Web site. Public review is also built into the plan development time line.
DE, EPA	EPA commented/suggested clarifying language on roles and responsibilities. DE specifically had concern about the role of the third party managing funds, suggesting instead the CBP do so.	Roles and responsibilities section was added to the framework and further clarifies/specifies roles.
DC, MD, MWCOG	Commented it will be important to work out the crediting details, particularly since utilizing pooled funds. MD suggested innovative financing approaches that do not impact states' WIP efforts.	Agreed. Crediting details will be further clarified in the Conowingo WIP itself. Also, crediting section in the Framework was updated to consider innovative approaches.
DC, MWCOG	Commented it will also be important to consider/fund ongoing Conowingo WIP project maintenance.	Agreed. These details will also be specified in the Conowingo WIP similar to the states' WIP verification processes.
WV	WV commented that the time line mentioned assigning jurisdiction-specific responsibilities which appears contrary to the regional pooled approach.	Agreed and language removed from the time line.