



Mattawoman Watershed Society

Protecting and preserving Mattawoman Creek for the enjoyment of all.

Nick DiPasquale
Director, Chesapeake Bay Program
c/o Comment Coordinator
410 Severn Ave
Annapolis, MD

August 15, 2013
via email: agreement@chesapeakebay.net

Re: draft Chesapeake Bay Agreement (abridged version for early stakeholder input)

Dear Comment Coordinator:

Our comments rely on a specific watershed example, but given the outstanding nature of Mattawoman Creek, and the sharply defined threat to it by watershed urbanization—the only pollution sector in the Bay still increasing—we believe it serves as an apt sounding board for important aspects of the Chesapeake Bay Agreement.

The Mattawoman Watershed Society has an especially keen interest in the Agreement because Mattawoman—which has been regarded by Maryland fisheries scientists as “*the best, most productive tributary to the Bay*”¹—is now showing signs of stress² despite progress that has followed previous Bay agreements.

So while we are pleased that “sound land-use planning” is listed for further consideration, we are also disappointed that at present it has not figured more specifically in any proposed goal/outcome. At the same time, we applaud the introduction of the component to specifically protect healthy watersheds.

We note that Mattawoman serves as an example for the larger Bay. In particular, longstanding warnings³ of the threat of development to outstanding watersheds, including Mattawoman in particular,^{3,4,5} appear to be coming true: a recently detected change in Mattawoman’s estuarine fish community has been linked to land-use conversion from open-space to urbanization. In addition, tidal freshwater is a globally rare commodity, yet it serves the Bay as a spawning and nursery ground for any number of important game and forage fish, including federally endangered sturgeon, striped bass, and the alosine species that are in

¹ *What could happen to tidal fish habitat and fisheries in Mattawoman? Lessons learned in Severn River and other developed Bay tributaries*, presentation by J. Uphoff to Charles County Commissioners, June 14, 2005.

² *The Case for Protection of the Watershed Resources of Mattawoman Creek: Recommendations and Management Initiatives to Protect the Mattawoman Ecosystem*, The Interagency Mattawoman Ecosystem Management Task Force. (2012)

³ Clean Water Action Plan (1998).

⁴ *Fish sampling in eight Chesapeake Bay tributaries*, Carmichael *et al.*, MD Dept. Natural Resources, Report CBRM-HI-92-2 (1992)

⁵ *Mattawoman Creek Watershed Management Plan*, U.S. Army Corps of Engineers, Baltimore District (2003)

such decline. Because of historical development along the fall line, tidal freshwater in the Bay has experienced degradation over time, with few examples remaining in “*ideal conditions*,” as Mattawoman has also been termed based on comparative scientific surveys.⁴

A key component of Bay restoration must be the preservation of its healthy waters, as recognized in the laudable Healthy Watershed Goal to “[p]rotect state-identified healthy waters and watersheds...” However, as noted above, research by the Bay Program finds that among the primary pollution sectors (air deposition, agriculture, wastewater, and urbanization), only the pollution from urbanization is increasing.⁶

Furthermore, impervious surface in the Bay watershed is increasing *five times faster* than population.⁷ A worthy outcome of the Agreement would be to reduce this astonishing ratio.

Clearly, without attention to land-use, we may be faced with fewer healthy watersheds over time to protect (Healthy Watersheds). We may also find that restoration goals for stream health and function (Vital Habitats) are undermined on balance, or that the yellow perch fishery declines (Sustainable Fisheries). In addition, the resiliency of the Bay to climate change depends on land-use that favors forest over impervious surface.

The current absence of specific land-use goals may reflect the difficulties traditionally encountered when an overarching and inter-jurisdictional program must necessarily interface with local governments, which control land-use decisions. Yet land-use profoundly affects the concerns of many, if not most, of the Goal Implementation Teams, and is similarly a challenge that must be met in the Watershed Implementation Plans of interest to all participating jurisdictions. Hence we urge that that this critical issue be revisited.

We also urge that an outcome be considered for “Data collection, verification and transparency,” specifically that continuous monitoring stations be increased. Again using Mattawoman as an example, continuous monitoring may be presently *decreasing*, with the loss in 2011 of a USGS continuous monitor on the non-tidal river, and in 2013 of a continuous monitor in the tidal estuary at Indian Head. Without continuous monitoring, the discovery of the correlation of water conductivity to River Herring habitat usage, and the unexpected discovery of lethally low levels of dissolved oxygen in dense SAV beds would not have occurred. Such monitoring informs the signers of the Agreement of progress or lack thereof, calibrates models, identifies episodic problems, and provides a needed baseline for the inevitable evolution of restoration approaches and the effects of climate change.

Respectfully submitted,

Jim Long
President

⁶ *Chesapeake Bay 2006 Health & Restoration Assessment, Part Two: Restoration Efforts* Chesapeake Bay Program (2007). Report identifiers CBP/TRS 284/07; EPA 093R-07002.

⁷ *Chesapeake Bay Health and Restoration Assessment 2007: a report to the citizens of the Bay region*, Chesapeake Bay Program, Report CBP/TRS-291-08 (March 2008)