



**Chesapeake Bay Program**  
**SCIENTIFIC AND TECHNICAL ADVISORY COMMITTEE**  
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August 29, 2025

Dear Principal's Staff Committee Members,

In its role as an advisory body to the leadership of the Chesapeake Bay Partnership (CBP), the CBP Scientific and Technical Advisory Committee (STAC) respectfully offers the following comments on the Revised 2025 Chesapeake Bay Watershed Agreement, as distributed for public comment on July 1, 2025. We do so both directly to the PSC in our role as an advisory committee and to the public comment mailbox for general consideration. These comments build on the comments we offered on the draft Beyond 2025 report in August 2024, which in turn built on STAC's 2023 Comprehensive Evaluation of System Response (CESR) report.

First, STAC appreciates that a process of broad engagement was used to produce the draft Revised Watershed Agreement, and we acknowledge the tremendous effort by the many dedicated, informed participants to produce it. STAC finds that the revised agreement is a comprehensive reworking of the 2014 Agreement with efficient reorganization, condensation, and restructuring of the goals and outcomes. It presents a blueprint for achieving program objectives through a logical, minimally disruptive process, allowing the important work of the program to continue largely uninterrupted.

However, STAC also believes the draft agreement can be significantly improved through further revision, some of it significant. In particular, an opportunity has been missed to update the opening of the document, which presently contains nearly the same Vision, Preamble, and Principles sections that were present in the 2014 Agreement. The new introduction to the agreement should more explicitly acknowledge what has happened over the last decade of the Chesapeake Bay Program -- both examples of key progress in specific areas, but also the new challenges that have arisen. Reorganization of the introduction's structure is warranted, and there are some notable omissions, such as no mention of the TMDL.

In the following, we first present six broad, holistic themes that will require more work to address, sometimes affecting multiple goals and outcomes. We then offer a larger number of suggestions to improve wording and clarity in specific locations.

**Major revisions:**

1. The organization and readability of the draft agreement need work. For example, the organization might work better with the Preamble before the Vision to provide context. A more explicit structuring of the document (perhaps using an outline or chapter format) to

better define the hierarchy of Goals, Outcomes, and Targets would improve readability. A figure showing these relationships would be helpful, perhaps after the introduction to the goals and outcomes. The style and content of the outcomes and targets sections in this version are uneven. A few well-placed visual elements throughout the document would improve readability as well (e.g., a diagram illustrating connections between the outcomes).

2. The Revised 2025 Watershed Agreement is uninspiring, currently reading more like a CBP insider's document than an outward facing, motivational compact. Perhaps this is because it fails to acknowledge the big challenges that have slowed progress to date, does not present a clear vision for how ongoing and emerging challenges can be met, and does not tell a compelling story about achieving success. Minor reorganization, expansion, and simplification might help. If the last part of the preamble addressed the unresolved issues and the vision statement followed to point the way forward, they would set the stage for the rest of the Agreement to show how to achieve program goals in a realistic, challenging, but ultimately successful way. A final summary section also might be added to tie together all the preceding elements of the revised Agreement, recognize remaining challenges, and end on a hopeful note. *In other words, the Agreement needs a story line.*
3. The Principles section is confusing and its purpose unclear. Does this section reflect programmatic values or operating principles? It reads like a long list of operating principles at present. Should there be a values statement as well? Further, the principles do not seem to be referred to in the rest of the document. STAC's draft of Foundational Strategies was intended to operationalize the principles for application. While the STAC Foundational Strategies may not be the best or only way to achieve this goal, the current Principles section does not, and it seems orphaned.
4. The TMDL has disappeared in the revised watershed agreement, while it figured prominently in the 2014 agreement. Its absence speaks more loudly than would an explicit acknowledgement of the partnership's failure to achieve it by 2025 as promised in the 2014 agreement. The current statement in the second paragraph of the Preamble that "The Chesapeake Bay Program partners have made much progress in that time, and there is still more to do..." is far too weak. Acknowledging shortfalls and addressing remaining challenges would be more honest, open, and believable.
5. A central difficulty of achieving the aims of the Partnership is that there are fundamental trade-offs between the environmental goals of the agreement and other societal goals, especially economic vitality in many sectors including agriculture, commercial fishing, infrastructure, transportation, and energy. A holistic vision of a healthy Chesapeake Bay and its watershed needs to acknowledge these trade-offs and show how the social, economic, and environmental aims of society can complement each other when balanced appropriately. Addition of an Outcome under Engaged Communities about balancing environmental goals with economic and social vitality might help.
6. In some cases, goals and outcomes are too narrow, are not sufficiently connected to each other, or are missing essential elements. For example, though changing environmental

conditions will affect all 4 goals and multiple outcomes, they are only mentioned in a single outcome under the Healthy Landscapes goal, and then only in the context of recommending nature-based adaptation solutions. The likely effects of changing environmental conditions, including sea level rise, increasing water temperatures, related oxygen stress, more extreme events, salinization, and species shifts, should be woven throughout the document. Another example is the lack of explicit recognition of the importance of balancing environmental goals and economic vitality, as discussed above. Finally, there are many outcomes that are closely connected and may be best addressed through cooperative efforts. Though it may not be possible to discuss all these connections in this document, they should be acknowledged and perhaps illustrated visually. Several Beyond 2025 participants have drafted effective versions of such a figure.

7. The Revised 2025 Agreement could provide clearer recognition of the role of Tribal Nations within the partnership. At present, the draft Agreement states that the partnership will "consider" Indigenous Knowledge. Language that more affirmatively recognizes and integrates Indigenous Knowledge in decision-making would better reflect the values emphasized throughout the Agreement. Similarly, acknowledging opportunities for Tribal Nations to participate in leadership structures would signal a more collaborative approach that honors their sovereignty while advancing shared partnership goals.

**Specific comments and recommended edits:**

8. In the vision statement, add “high quality habitats” before “abundant life”
9. The introductory paragraph of the Goals and Outcomes section states that the outcomes are SMART, but in most cases it is the outcome targets that are SMART while the outcomes remain more qualitative.
10. Throughout the document, the phrase “Chesapeake Bay watershed” would be better replaced with “Chesapeake Bay and its watershed”. These phrases don’t mean the same thing.
11. 1st paragraph under Thriving Habitat – replace “fisheries” with “living resources”.
12. Remove “Sustainability” after “Blue Crab” for outcome 1, for consistency with other outcome names.
13. Under Wetlands, repeat or explicitly reference the full Buffer Protection Target from the Protected Lands Outcome, ending with “(also tracked under Protected Lands Outcome)”.
14. Add or edit uniform target dates wherever possible, throughout the document.
15. Throughout the document, the targets language is the most uneven and difficult to compare. The targets are the specific, most quantifiable aspects of the agreement. In addition to being SMART, they should be comparable in language, scope, and time frame across goals and outcomes.
16. Under Fish Passage, replace “aquatic” with “freshwater”.
17. In the description of the Clean Water goal, replace “aquatic wildlife” with “living resources”.
18. In the first paragraph under “Water Quality Standards Attainment and Monitoring”, insert “toxic contaminants,” before “and other parameters”.

19. Under “Water Quality Standards Attainment and Monitoring”, replace “Develop Methods for WQ Standards Attainment” with “Improve Methods for Assessing WQ Standards Attainment”.
20. Under “Reducing Excess Nitrogen, Phosphorous and Sediment” bullet 1, replace “interim” with “current”.
21. Under “Wetlands” under “Protected Lands”, after “protection of buffer zones” add “that facilitate future wetland expansion”.
22. Under “Healthy Forests and Trees”, add “Community” or “Urban” before “Tree Canopy”.
23. Under “Adapting to Changing Environmental Conditions”, replace the exclusive references to “nature-based solutions” with more general language including but not limited to nature-based solutions. The challenges likely to result from changing environmental conditions will need every available tool available. Nature-based solutions may be fine for some purposes, but not for all of them.
24. In the first paragraph under Engaged Communities, add “and restoration” to “conservation”.
25. Under local leadership, or somewhere in the Engaged Communities section, there should be a strong statement in support of allowing sandboxing approaches to solving local problems. This phrase or language to this effect does not appear anywhere.
26. In the 2<sup>nd</sup> paragraph under Management Strategies, replace “implementing Outcomes” with “implementing actions to achieve Outcomes”.

Respectfully representing the STAC,

A handwritten signature in black ink that reads "Lawrence P. Sanford." The signature is written in a cursive, flowing style.

Lawrence Sanford, Ph.D.

Chair, Chesapeake Bay Program's Scientific and Technical Advisory Committee (STAC)