

August 27, 2024

Beyond 2025 Steering Committee
Chesapeake Bay Program
comments@chesapeakebay.net

Re: Chesapeake Bay Watershed Freshwater Mussel Partnership Recommendations to the
Chesapeake Bay Watershed Agreement Beyond 2025

Dear Beyond 2025 Steering Committee:

I am pleased to submit the attached comment letter on behalf of the steering committee for the Chesapeake Bay Watershed Freshwater Mussel (FWM) Partnership, and I respectfully ask the Chesapeake Executive Council to embrace the FWM Partnership's recommendations in consideration of the Chesapeake Bay Program (CBP) Partnership's commitments to the 2014 *Chesapeake Bay Watershed Agreement* beyond 2025.

Since its inception in 1983 as a voluntary agreement, the CBP Partnership has evolved into a scientific, regulatory, and chiefly a potent and unmatched cooperative framework for improving water quality, enhancing habitat, and igniting environmental stewardship across the Bay watershed. As you know well the Susquehanna River is the largest tributary to the Bay and the Susquehanna River Basin Commission (SRBC) is proud of our long-standing and integral relationship within the CBP Partnership. As Executive Director of SRBC, I value and applaud the CBP's vision and leadership.

Chief among its comments, the FWM Partnership encourages the Executive Council to recognize freshwater mussels as *species of concern* when prioritizing the activities and especially the CBP Partnership's programmatic resources devoted to conservation, restoration, and uplift of the living resources, habitats, and human communities in non-tidal parts of the Bay watershed. Acknowledging freshwater mussels as *species of concern* creates opportunities to align considerations for and about such pivotal organisms into the Goals and Outcomes that signatories of the Chesapeake Bay Watershed Agreement work collectively to achieve.

Sincerely,

Andrew D. Dehoff
Executive Director

August 27, 2024

Beyond 2025 Steering Committee

RE: Comments Offered in *Chesapeake Bay Watershed Agreement* Category

Dear Steering Committee:

Please accept this letter on behalf of the **Chesapeake Bay Watershed Region Freshwater Mussel Partnership** (hereinafter, “FWM Partnership”; <https://www.srbc.gov/our-work/what-we-do/chesapeake-bay-freshwater-mussel-partnership.html>). The FWM Partnership formed in 2023 at the request of leaders in Maryland Department of the Environment and Pennsylvania Department of Environmental Protection for regular dialogue among the region’s freshwater mussel (FWM) experts. The FWM Partnership builds from a series of workshops and meetings undertaken jointly by Maryland and National Fish and Wildlife Foundation (2022–2023) as well as the Chesapeake Bay Program’s (CBP’s) Scientific & Technical Advisory Committee (2020); although, leaders from state and federal FWM programs have met consistently since 2010.

The FWM Partnership is an *ad hoc* group of stakeholders from across the Bay Watershed who are drawn together by a shared enthusiasm for freshwater mussels due to their novel ecological niche; capacity for engaging the public in freshwater portions of the watershed; beneficial roles for water quality and habitat; and, concerns about their widespread population declines. The FWM stakeholder community is an underutilized resource pool in terms of regional collaboration on issues crucial to ecosystem conservation and restoration.

Freshwater mussels occur throughout the Chesapeake Bay Watershed ecosystem where iconic Bay species, like “rockfish,” blue crabs, and oysters, are absent. Due mostly to human-caused impacts, FWM are widely considered as among the most threatened group of aquatic organisms in North America. Moreover, FWM are a *keystone* animal group that enhance habitat, water quality, and biodiversity disproportionate to their often overlooked and seemingly bland presence.

In its [2020 STAC Workshop Report](#), a panel of FWM experts recommended the CBP Partnership adopt the following five initiatives: (i) provide consistent financial support for staff and resources to conduct mussel surveys, monitoring, propagation, conservation, and education; (ii) integrate FWM across various work groups and goal implementation teams; (iii) link public engagement to comprehensive FWM restoration strategies; (iv) actively support FWM scientific research; and, (v) pursue intersections between FWM restoration and nutrient mitigation. The STAC Workshop-endorsed initiatives directly align with the three high-level recommendations and considerations set forth on page 7 in the draft report, “[A critical path forward for CBP Partnership beyond 2025](#)”, namely to: (1) emphasize rigorous Science; (2) support a holistic approach to Restoration and conservation for the ecosystem’s living resources, tidal and non-tidal alike; and, (3) embrace Partnerships relevant to all Bay Watershed communities.

One of the most important steps towards expanding and restoring freshwater mussel populations, as identified in the STAC Workshop Report, was public engagement. Inspiring actions through greater engagement is also touted as a key factor for the CBP Partnership’s success Beyond 2025. Highlighting the unique and complex life history of FWM, promoting their array of ecosystem services including their roles in nutrient cycling and denitrification, and seeking to better understand the habitat and water quality connections of FWM in the context of water and watershed management practices has tremendous value in the recommitment to the Chesapeake Bay Watershed Agreement. In practice, emphasis as *species of concern* enables freshwater mussels to be incorporated into the Goals and Outcomes of the Bay Watershed

Agreement's framework, such as considering FWM in existing Technical Work Groups, Goal Implementation Teams, Advisory Committees, and the like.

Freshwater mussels represent an important part of the natural heritage, ecology, and biodiversity of the Chesapeake Bay Watershed. FWM are valuable to the ecosystem yet vulnerable to extirpation and ultimately extinction. As the CBP Partnership begins implementation of Beyond 2025 recommendations as agreed to by the Executive Council, we urge the CBP Partnership to recognize freshwater mussels as *species (plural) of concern* when prioritizing conservation and restoration activities of living resources and habitat in non-tidal areas.

Sincerely,

The FWM Partnership Steering Committee Members:

Annie Stupik | Biologist, Freshwater Mussel Program, New York State Department of Environmental Conservation

Scott Heidel | Environmental Group Manager, Chesapeake Bay Partnership Section, Pennsylvania Department of Environmental Protection

Ashley Hullinger | Water Program Specialist, Chesapeake Bay Partnership Section, Pennsylvania Department of Environmental Protection

Joe Wood | Virginia Senior Scientist, Chesapeake Bay Foundation

Brian Watson | State Malacologist, Virginia Department of Wildlife Resources

Kurt Cheng | Senior Science Manager, Partnership for the Delaware Estuary

Danielle Kreeger | Research Associate Professor, Drexel University

Mieko Camp | Project Manager, Water and Science Administration, Maryland Department of the Environment

James Shallenberger | Program Manager, Monitoring & Protection, Susquehanna River Basin Commission