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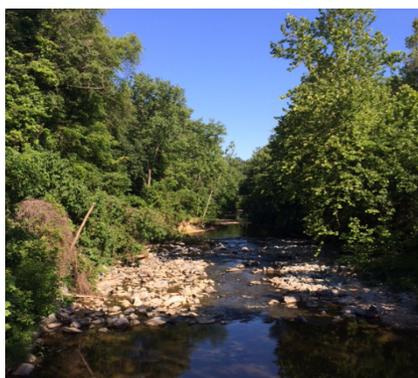
Bay Brief Quarterly



SPRING 2017

Another Win for the Bay! City of Annapolis Strengthens Maryland Forest Conservation Act

On March 27, 2017, the City of Annapolis amended its ordinance implementing the Maryland Forest Conservation Act (FCA) including an acre for acre tree replacement requirement (above designated thresholds depending on land use) replacing the ¼ acre replacement per acre requirement. Another important change is the creation of a clear appeals process of forest conservation plans associated with planned subdivisions, grading permits, and sediment control plans – a process that was unclear previously and used to block citizen appeals.



CLA volunteer attorney Russ Stevenson helped bring the FCA and the City's failure to implement the Act to the City's attention in 2012, and, in the ensuing years, the resulting implementation ordinance has been used by citizen advocacy groups, supported by CLA volunteer attorneys, to help prevent and improve development projects along the South River on land annexed by the City of Annapolis. The work of these groups has resulted in major modifications to both the proposed Parkside Preserve (formerly Reserve at Quiet

Waters) and Crystal Springs developments in terms of their scope, permit requirements, and protection of sensitive wooded areas and wetlands. Over the years, homeowner's associations and coalitions have been assisted by CLA volunteer attorneys Tom Deming, George Mahaffey (Goodell, DeVries, Leech & Dann, LLP), Dirk Schwenk (Bay Law, LLC), Wells Burgess, Jeff Luoma, Paul Smail, Zachary Howerton, and Shauna Davis with appeals, comments, testimony, advocacy, and informational memoranda.

The City's recent amendment action is a significant step in the right direction – it will impact site design of developments within Annapolis, help Annapolis reach its forest canopy goals, and it will serve as useful precedent to other localities tasked with implementation of the FCA.

You can find the amended ordinance here:

<https://annapolismd.legistar.com/View.ashx?M=F&ID=5097456&GUID=2C3A4D28-68E2-4663-9D39-D5D7DEBB7841>

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More Muscle for the Bay!

Maryland General Assembly Funds Environmental Enforcement Positions

In April, the Maryland General Assembly designated \$400,000 of the state's FY2018 budget to fill vacant enforcement and compliance positions within the Maryland Department of Agriculture (MDA) and the Maryland Department of the Environment (MDE). This action reverses years of declining funding for enforcement of environmental laws by MDA and MDE, whose limited resources have resulted in understaffing of inspection and enforcement positions. State enforcement and compliance assurance capacity is especially important as EPA faces complete elimination of all funding for its Chesapeake Bay Program, and significant reductions in enforcement resources in both its national and regional offices.

In partnership with the Center for Progressive Reform, the Maryland League of Conservation Voters, and the Maryland Choose Clean Agriculture Committee, CLA provided informational testimony to the Maryland Legislative Budget Committee concerning how water quality enforcement has been impacted over

the past three years by the decline in enforcement capacity at MDE. By helping to raise the level of awareness at the Budget Committee level, CLA is helped to ensure more capacity for monitoring and enforcement of the environmental laws and regulations that work toward keeping the Bay safe and healthy.



For additional information, see the Maryland Clean Agriculture Coalition press release quoting CLA: http://www.chesapeakelegal.org/documents/Enforcement_funding_press_release_April_2017.pdf

You can find the budget language on page 243 of the Maryland House Bill: <http://mgaleg.maryland.gov/2017RS/bills/hb/hb0150E.pdf>

Natural Gas Companies Apply for 50 Year Permit Posing Risks to Struggling Bat Populations

Nine oil and gas companies that operate individually within Pennsylvania, West Virginia, and Ohio are asking the U.S. Fish and Wildlife Service for permission to kill or disturb five endangered bat species. The companies have requested a 50-year permit (also known as an "Incidental Take Permit") under the Endangered Species Act because their natural gas development and production operations may incidentally "take" endangered bats known to occur within this three-state region. The companies are in the process of developing a required habitat conservation plan that will propose ways the companies can avoid, minimize and mitigate potential impacts to the declining bat species.



Section 9 of the Endangered Species Act (ESA) prohibits "take" of fish and wildlife species listed as endangered, and under certain circumstances those listed as threatened. The ESA defines the term "take" to mean "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." (16 U.S.C. 1532 (19)). This includes acts that kill or injure wildlife through significant modification or degradation of habitat or by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Pursuant to the ESA, the Secretary of the Interior may issue permits that authorize "incidental take" of endangered species if the applicant meets certain criteria, including a demonstration that the taking



will not reduce appreciably the likelihood of survival and recovery of the species in the wild.

Construction of oil and gas infrastructure is known to increase habitat loss and habitat fragmentation of already stressed bat colonies. Also, the operation of compressor stations produces noise and light pollution known to impact bat colonies, especially during roosting. The massive three-state scope of the permit and 50-year duration are especially concerning and should warrant heightened scrutiny of the permit. It is questionable whether one permit could account for future changes over a 50-year period in both the bat colonies and best practices used to protect the bat colonies.

The U.S. Fish and Wildlife Service is in the process of reviewing the permit request and published a Notice of Intent to draft an Environmental Impact Statement (EIS) that will analyze the impacts the permit would have on the bat species, and evaluate alternatives that may result in denial or modifications to the permit as proposed by the companies. The Agency is now in the

process of compiling public comments and collecting and analyzing data needed to inform the EIS analysis. The Agency will then prepare and release a draft EIS on which the public may submit comments and the Agency will schedule public meetings.

The Law Office of Sheila Jones is assisting CLA with strategic analysis as it assists the Mehoopany Creek Watershed Association with additional legal counsel to draft comments in response to the draft EIS once it is published.

You can view the U.S. Fish and Wildlife Service Notice of Intent to create an Environmental Impact Statement here: <https://www.federalregister.gov/documents/2016/11/25/2016-28336/proposed-oil-and-gas-coalition-multi-state-habitat-conservation-plan-for-ohio-pennsylvania-and-west>

The U.S. Fish and Wildlife Service has created a resources page for this requested permit: <https://www.fws.gov/northeast/ecologicalservices/hcp/oghcp.html>

Chopping Federal Funding for Bay Programs Directly Impacts State Efforts

Proper enforcement of existing laws, and inspections and maintenance of facilities consistent with these laws are the cheapest methods of pollution reduction and the most cost-effective way to protect the environment and public health. Yet, President Trump's proposed budget reduces the Environmental Protection Agency (EPA)'s overall budget by 43 percent, eliminates funding for the Chesapeake Bay Program, and drastically reduces funding for other programs that impact the Chesapeake Bay Cleanup Plan.

Bay Clean Up – the Chesapeake Bay TMDL: In 2010, EPA produced a plan to establish pollution reduction goals (total maximum daily

CLA in the Air with SouthWings

SouthWings recently took CLA staff up in the air for an eagle's eye view of the Bay and the lower Eastern shore. Volunteer pilot, Ron Baker, covered Talbot, Dorchester, Somerset, Wicomico, and Worcester counties for a unique look at the size and number of poultry houses in those areas, as well as their proximity to waterways that feed into the Chesapeake Bay.

SouthWings is a non-profit organization that works with a network of volunteer pilots to help educate and advocate for the health of ecosystems and biodiversity throughout the Southeast United States. Headquartered in Asheville, North Carolina, SouthWings

opened its Annapolis office in 2016. We look forward to working with SouthWings to promote the health of the Chesapeake Bay! Find out more about SouthWings and the important work that they do here: <http://www.southwings.org/>





loads (TMDL) for jurisdictions and major river basins of the Chesapeake Bay watershed. This plan was developed by EPA in collaboration with the six Bay states and the District of Columbia. EPA has authority to enforce the requirements of these cleanup goals, but without funding for the Bay Program, EPA will be unable to hold states accountable.

State Budget Issues – EPA has delegated authority to the majority of states to manage programs pursuant to many federal environmental laws and manage federal funds to implement related environmental regulations. The three largest sources of funding for state environmental agencies include state general fund allocations, federal funding, and fees. Trump’s proposed budget cuts 44.5 percent of EPA grants to states for environmental program administration, including permitting and enforcement. The Maryland Department of the Environment (MDE) depends on federal dollars for approximately 19 percent of its operations budget.

Problems that this proposed funding cut will cause for Bay states are exacerbated by Bay states facing budget deficits and significant reductions in state appropriated funds to environmental agencies. For example, since 2002, Pennsylvania Department of Environmental Protection (DEP) funding has been cut approximately 40 percent and staffing has been reduced by about 600 positions. EPA has determined that Pennsylvania is behind on many of its Bay TMDL clean-up goals, including reducing pollution from the state’s 33,600 farms. These agricultural operations are a major source of pollution to the Chesapeake Bay, but DEP lacks sufficient staff to track and monitor these operations and ensure they meet pollution reduction requirements. Similarly, DEP’s Division of Water Quality Standards needs at least 12-18 additional biologists to sufficiently staff regional offices. Lack of key enforcement and technical staff result in a slower permitting process, less inspections and enforcement, and more pollution making its way into state waters and, eventually, the Bay.

NEW REPORT: “Pennsylvania in the Balance: Harnessing Agriculture’s Culture of Stewardship as a Solution to Clean Water.”

Pennsylvania farmers in the Chesapeake Bay watershed will be persuaded to look at conservation not as something they must do but rather something they want to do. That’s one of the key conclusions in a recent report from a conference that brought together farmers, representatives of farm and environmental groups, and local, state and federal government officials to find new collaborative strategies for reducing excess nutrients from Pennsylvania agriculture flowing into the Commonwealth’s rivers and the Chesapeake Bay, while maintaining a vibrant agriculture industry. Held in Hershey last March and called “Pennsylvania in the Balance,” the conference was organized by Penn State’s College of Agricultural Sciences. There was universal support among attendees for having

“champion farmers” lead other farmers in transforming the PA farming community’s perspective to one of collaborative conservation.

For more information on Pennsylvania in the Balance and the PA in the Balance Partnership, contact Matt Royer, Penn State Agriculture and Environment Center, mroyer@psu.edu, (814) 863-8765.

You can read the Pennsylvania in the Balance report here: http://agsci.psu.edu/aec/research-extension/conferences-and-workshops/pa-in-balance/default/extension_publication_file.

Maryland Oyster Sanctuaries Aren’t for Harvesting

The Maryland Legislature passed a moratorium on opening any of the state’s 51 current oyster sanctuaries to commercial harvesting practices. The moratorium blocks any changes to the existing boundaries and protections offered by the sanctuaries until the Maryland Department of Natural Resources (DNR) completes a study on the state’s oyster populations and determines sustainable levels of harvesting. The study must be completed by December 2018. This is a big win for oyster sanctuaries that were under direct threat to being opened for rotational harvesting.

CLA volunteer attorneys assisted groups in providing comments to the legislature asking it to require DNR to make oyster management decisions based on sound science and meet the requirements of all applicable laws.

You can read **HB 924** here: <http://mgaleg.maryland.gov/2017RS/bills/hb/hb0924T.pdf>





New CLA Matters

Miles & Stockbridge (Baltimore, MD) provided a **land conservation organization** assistance to review an existing easement and prepare for a deposition.

The Vermont Law School Environmental & Natural Resources Law Clinic is assisting the **Midshore Riverkeeper Conservancy (MRC)** to review a possible unpermitted discharge into surface water at an Eastern Shore facility site. The clinic is also helping MRC analyze possible legal strategies to bring the facility into compliance with the Clean Water Act.

CLA Staff provided written and oral informational testimony to the Maryland House of Delegates Appropriations Committee outlining how reduced staffing and enforcement capabilities at MDE have impacted CLA's work in Maryland. CLA Staff also drafted an educational document that was used to support a **Maryland Choose Clean Water Coalition** letter sent to Maryland Senate and House budget committees in support of setting aside MDE and MDA funding specifically for enforcement positions.

Phillip Chalker, Law Office of Phillip Chalker (Baltimore, MD) assisted the **Choose Clean Water Coalition** in the assessment of duties imposed on state agencies to prevent and remedy stormwater runoff from a proposed expansion of the Nice Bridge in Southern Maryland. The three-year construction plan involves upgrading the current two-lane structure to four lanes with a bike/pedestrian path along one side.

Allison Zieve, Public Citizen (Washington, DC) provided **Choose Clean Water Coalition** with guidance and materials on IRS restrictions on lobbying by non-profit organizations during two webinars in preparation for Chesapeake Bay Lobby Day on Capitol Hill.

Mary Staley (Bethesda, MD) is assisting the **Chesapeake Bay Program Local Government Advisory Committee's Environmental Finance Symposium Report Action Team** to analyze and

help redraft the organization's current reports and recommendations to provide updated concrete recommendations to local governments on best practices for efficient policies that encourage Bay restoration.

Paul Pollock and David Fischer, Crowell & Moring LLP (Washington, DC) are assisting a **fish conservation organization** with corporate counsel regarding obtaining non-profit tax exempt status and completion of the associated incorporation and tax documents.

Sheila Jones, Law Office of Sheila Jones (Washington, DC) is assisting **CLA** with its evaluation of a Environmental Impact Statement (EIS) issued by the Fish and Wildlife Service regarding a Bat Incidental Take Permit under the Endangered Species Act applied for by nine gas pipeline companies. The Mehoopany Creek Watershed Association will use this information in drafting comments on the draft EIS once it is published.

James Carlsen (Annapolis, MD), and **CLA Staff and Interns** are helping the **Back Creek Conservancy** conduct legal research, analysis, and drafting of documents related to a proposed pilot project to promote Shoreline Stewardship in the City of Annapolis, MD.

CLA Staff assisted an **environmental advocate** in Baltimore research and analyze legislation that could expand the existing Environmental Standing Act, as well as what, if any, bills other legislatures have proposed that would expand citizen standing to challenge hydraulic fracturing operations and/or bring claims for related damages.

CLA Staff assisted the **Anne Arundel Equestrian Alliance** with strategic advice and drafting correspondence to the Anne Arundel County Executive and the Director of Recreation and Parks to request support to designate a 400-acre county owned property as equestrian open space.

CLA Welcomes New Board Member Deborah Jennings

Deborah Jennings is Senior Counsel at the Washington, D.C. office of DLA Piper. Deborah has extensive experience in environmental litigation and negotiations related to air, water, and hazardous waste permit issues, as well as transportation, cleanup and disposal of hazardous substances. She is also experienced with policies addressing ozone, acid rain, and climate change. Deborah is a former Assistant Attorney General of Maryland and Chief, Criminal Investigations Division as well as a former Assistant State's Attorney for Montgomery County, Maryland. She has been listed in The Best Lawyers of America for the past 17 years in recognition of her environmental law practice and is currently on the Board of Regents of the American College of Environmental Lawyers.



New Legal Developments

Trump Uses Congressional Review Act to Overturn Obama Administration Rules

The Congressional Review Act (CRA) is a rarely used law that allows an incoming Administration to overturn regulations finalized late in the previous Administration. The CRA has only been used successfully once --by the George W. Bush Administration - but is back in use by the Trump Administration. Trump may use the CRA until early May to overturn Obama rules finalized after June 2016.

Concerning water quality, Trump used the CRA to overturn the Department of the Interior's (DOI) Office of Surface Mining and Reclamation and Enforcement (OSMRE) Stream Protection Rule (published on December 20, 2016 at 81 Fed. Reg. 93066). This rule, issued under the Surface Mining Control and Reclamation Act, after over seven years of development, was adopted to protect water quality in waters adjacent to coal mining operations by ensuring that discharges to water during and after mining activities are permitted, monitored, and mitigated. Trump's action prevents EPA from creating a substantially similar rule, without Congressional approval.

You can read the rule disapproval here: <https://www.congress.gov/115/bills/hjres38/BILLS-115hjres38ih.pdf>

The Supreme Court to Determine Which Lower Court May Hear "Waters of the United States" Cases and Trump's Response

In January 2017, the U.S. Supreme Court granted certiorari to determine which federal circuit court has jurisdiction under the Clean Water Act (CWA) to decide cases related to the Act's definition of "waters of the United States" or "WOTUS." The Supreme Court will not hear questions related to the definition of WOTUS-- those waters subject to federal jurisdiction pursuant to the CWA. In June 2015, EPA promulgated a rule updating the WOTUS definition. The rule was met immediately with legal challenges brought in courts throughout the U.S., leading to questions regarding which court has the authority to hear the case.

In February 2017, President Trump issued an Executive Order that requires EPA and the U.S. Corps of Engineers to publish a new rule that would replace or amend the one promulgated in June 2015. President Trump directed the agencies to consider defining "waters of the United States" (WOTUS) in a much more narrow way. This process will take some time because revision or replacement of the rule requires the agencies to comply with the Administrative Procedures Act which requires providing the public an opportunity to comment. Any newly implemented rule will also be subject to legal

challenge. The Supreme Court denied a request by the Trump administration asking the Court to pause its review of the WOTUS jurisdiction case until the Administration could review and promulgate a new rule.

You can read the issue being considered by the Supreme Court here: <https://www.supremecourt.gov/qp/16-00299qp.pdf>

You can read more about the Waters of the United States rule here: https://www.washingtonpost.com/news/fact-checker/wp/2017/03/02/trumps-claim-that-waters-of-the-united-states-rule-cost-hundreds-of-thousands-of-jobs/?utm_term=.4844f707faf4

D.C. Circuit Declines Review of EPA Practices on Blending and Mixing Zones

The U.S. Court of Appeals for the Eighth Circuit decided previously that EPA could not ban two wastewater treatment techniques - mixing zones and blending peak wet weather flows. In February 2017, the D.C. Circuit dismissed a similar challenge related to EPA's continued ban of these methods in states outside of the Eighth Circuit.

The challengers in this case, *Center for Regulatory Reasonableness v. US EPA*, argued that EPA tried to limit the effect of the Eighth Circuit case by issuing statements that the decision only applied to states under that jurisdiction and refused to follow the decision in other states. By declining to hear this case, the D.C. Circuit decision may allow EPA to continue to ban blending and mixing zones in states outside the Eighth Circuit.

You can read the court decision here: <https://www.gpo.gov/fdsys/pkg/USCOURTS-caDC-14-01150/pdf/USCOURTS-caDC-14-01150-0.pdf>

EPA Issues General Construction Permit

In January 2017, EPA issued a Construction General Permit (CGP) which applies to land clearance and disturbance activities greater than one acre. The permit requires operators to comply with best management practices and effluent limits, and develop a Stormwater Pollution Prevention Plan ("SWPPP"). Changes include the creation of joint and several liability for site operators who divide responsibility for compliance with the general permit or those that operate under a group SWPPP,





New Legal Developments continued...

requires electronic reporting, and new site operation obligations. The new rule has been legally challenged by the National Association of Homebuilders.

You can read the rule here: <https://www.epa.gov/npdes/epas-2017-construction-generalpermit-cgp-and-related-documents>

U.S. Army Corps of Engineers Issues Final Set of Nationwide Permits

In January 2017, the U.S. Army Corps of Engineers (Corps) issued nationwide permits (NWP) to authorize certain activities that require Department of the Army permits under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act of 1899. The purpose of this regulatory action is to reissue 50 existing NWPs and to issue two new NWPs authorizing removal of low-head dams posing a threat to boaters, and construction and maintenance of living shorelines in estuarine or marine waters and the Great Lakes.

You can read the rule here: <https://www.gpo.gov/fdsys/pkg/FR-2017-01-06/pdf/2016-31355.pdf>

Stricter Oversight Required for Coal Ash Pits in Virginia

In March 2017, a Virginia federal court found that Dominion Virginia Power violated the Clean Water Act by allowing arsenic to seep into groundwater from coal ash stored in outdoor pits. This case is significant because the judge found that the Clean Water Act does regulate the discharge of pollutants into navigable surface waters through hydrologically connected groundwater. U.S. District Judge John Gibney rejected Dominion Virginia Power's argument that the Clean Water Act does not apply to groundwater. "Congress intended the CWA to protect the water quality of the nation's surface water. Where the facts show a direct hydrological connection between groundwater and surface water, that goal would be defeated if the CWA's jurisdiction did not extend to discharges to that groundwater," Judge Gibney said. The judge ordered the company to conduct monitoring around the ash piles and apply for a solid waste permit.

In early April, a proposed coal ash bill related to the Dominion Virginia Power facility became law. Virginia SB1398 states that before any draft permits are issued for the closure of any utility-owned coal ash impoundment, the Department of Environmental Quality and the Department of Conservation and Recreation must receive a full assessment of coal ash ponds and available closure options.

You can read the decision here: http://pilotonline.com/judge-s-opinion-on-coal-ash/pdf_119177d4-3d2f-5790-9da0-aa2e6908550b.html

You can find more information on the coal ash legislation here:

http://www.insidenova.com/headlines/coal-ash-ponds-power-companies-to-face-new-barrier-in/article_ca819dd8-1ae9-11e7-adee-43c8479bf041.html

Oil Recycling Company Sentenced for Conspiracy to Violate the Clean Water Act

International Petroleum Corporation operates a used oil recycling services facility in Wilmington, Delaware. The facility is permitted to accept various types of used petroleum based oils. The company was found to have illegally pumped potentially hazardous chemicals into the local wastewater treatment plant. Unknown quantities of hazardous substances likely entered the Delaware River and Bay. The company was ordered to pay \$3.5 million in fines and penalties for violating environmental laws over a period of 20 years.

You can read more about this case here: <http://www.delawareonline.com/story/news/local/2017/02/10/ipc-case-raises-enforcement-questions/97697428/>

The Fourth Circuit Finds that Water with High Conductivity Violates Narrative Water Quality Standards

In January, the U.S. Court of Appeals for the Fourth Circuit affirmed a district court's ruling that a coal company's discharge of water having high electrical conductivity adversely impacted stream chemistry and therefore violated narrative water quality standards. The Court also found that the Clean Water Act's permit





New Legal Developments continued...

shield did not protect against this violation.

You can read the opinion here: <http://www.ca4.uscourts.gov/Opinions/Published/161024.P.pdf>

The Second Circuit Upholds EPA's Water Transfer Rule

In January, the U.S. Court of Appeals for the Second Circuit found that EPA's decision not to apply National Pollutant Discharge Elimination System (NPDES) permitting requirements to water transfers was reasonable. The Court applied a legal doctrine of review called Chevron review, established in the case *Chevron, U.S.A., Inc. v. Natural*

Resources Defense Council, Inc. The Court's application of Chevron step-2 analysis found that EPA's interpretation of the Clean Water Act was reasonable. Therefore, water transfers will not be subject to the NPDES permitting process. Water transfers are those conveyances of water without intervening industrial, municipal, or commercial uses. Water transfers are made by farmers for irrigation, municipalities for water use, and utilities for power generation.

You can read more about the water transfer rule here: <https://www.gpo.gov/fdsys/pkg/FR-2008-06-13/pdf/E8-13360.pdf>



CLA Goes to Capitol Hill to Advocate for Chesapeake Bay Funding

On April 5, CLA joined the Choose Clean Water Coalition (CCWC) to educate the House and Senate about the importance of full funding of the Chesapeake Bay Program, including specific ways that these funds are improving the health of the Bay and its communities. President Trump's "skinny" budget proposal eliminated ALL funding for the \$73 million program – funding that is essential to states, local governments and non-profit organizations throughout the Bay watershed in coordinating and supporting Bay cleanup. Together, with approximately 130 other members of CCWA, we visited 33 different Congressional offices to advocate for these critical funds.

In preparation for this event, CLA volunteer attorney Allison Zieve, General Counsel of Public Citizen, advised regarding IRS lobbying rules for non-profit organizations during two webinars.

You can read the latest on the proposed federal budget here: https://www.washingtonpost.com/news/energy-environment/wp/2017/03/31/new-epa-documents-reveal-even-deeper-proposed-cuts-to-staff-and-programs/?utm_term=.5e3d13e2e23c



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