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CLA Volunteer Network Partners File Brief on Behalf of the Mattaponi Indian Tribe

The Mattaponi Indian Tribe, one of the six original tribes of the Powhatan Confederacy, is a Virginia state-recognized tribe with a reservation located in King William County, along the Mattaponi River. The Mattaponi have inhabited lands in the area for over 15,000 years; their cultural identity and livelihoods rely heavily on the health and vitality of the Mattaponi and James Rivers and their surrounding environments.



The proposed infrastructure, planned directly across the Captain John Smith Trail, includes 17 transmission towers, between 128 and 297 feet tall, an electrical switching station at Skiffes Creek, and further overhead transmission lines from Skiffes Creek to Wheelton, Virginia, affecting wetlands and forests.

CLA Volunteer Attorney Jill Grant, of Jill Grant and Associates, Washington D.C., in partnership with the University of Virginia School of Law Environmental and Regulatory Clinic, recently filed an amicus curiae, or “friend of the court,” brief on behalf of the Mattaponi Tribe. The brief was filed in support of an action brought by the National Trust for Historic Preservation in the United States (NTHP) and the Association for the Preservation of Virginia Antiquities (APVA) against the Army Corps of Engineers (the “Corps”) objecting to a plan by Virginia Electric & Power Company (“Dominion”) that involves construction of overhead electric transmission infrastructure across the James River from Surry to Skiffes Creek, near Jamestown Island.

In the underlying law suit, NTHP and APVA argue that the Corps authorized Dominion’s plans in violation of the National Environmental Policy Act (“NEPA”), the National Historic Preservation Act (“NHPA”), the Clean Water Act (“CWA”), and the Rivers and Harbors Act (“RHA”). In its brief, the Mattaponi Tribe focused on the Corps’ failure to complete a full Environmental Impact Statement (“EIS”) regarding the plan prior to issuing a Finding of No Significant Impact (“FONSI”) as required under NEPA. Without the EIS, the Corps is unable to evaluate the full impacts of the proposed project on the natural resources that the Tribe relies on, as required by NEPA, and therefore, the Corps should not have issued a FONSI in support of Dominion’s plans.

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Redevelopment of DC's Buzzard Point Sparks Community Concerns

The Buzzard Point neighborhood, located in the southeast section of the District of Columbia adjacent to the Anacostia River, has been undergoing major redevelopment changing dramatically both the built and cultural environments. Construction projects include new sports arenas and mixed-use developments, including the riverfront. This community has historically been comprised of low-income residents, 90 percent of which are people of color. Some longtime residents worry that the increase in construction, higher density, and increased traffic will further degrade the health of their community. Residents fear that the DC United soccer stadium construction, an existing nearby Pepco substation, and a concrete facility are impacting their environment. The Department of Health has encouraged the D.C. Department of Energy and the Environment (DOEE) to monitor closely Buzzard Point facilities, especially those in violation of the District's fugitive dust regulations, and prioritize enforcement of related policies and laws.

According to the D.C. Department of Health, Office of Health Equity, local community residents have complained particularly about fugitive dust and particulate matter emissions from Superior Concrete Materials, Inc. – a facility that mixes and batches concrete and which has been found in violation of its air quality permit. On November 17, 2017, DOEE published notice of a public hearing and solicitation of public comments on a new air permit requested from Superior Concrete Materials, Inc. to construct and operate a ready mix portable concrete batch plant in the community. This operation would replace the existing plant. The draft permit for the facility does not contain a mechanism for monitoring fugitive dust compliance with the terms of the permit and does not provide a method of addressing dust that may fall beyond the streets directly around the plant, which the facility has agreed to sweep every two to four hours. Community

CLA Executive Director Addresses Environmental Legislative Summit

In January, Jackie Guild, CLA's Executive Director provided remarks to lawmakers, Bay non-profits and community leaders on the need for funding to address compliance and enforcement vacancies at the Maryland Departments of the Environment and Agriculture. Examples were provided where CLA steps

2018 Maryland Environmental Legislative Summit



in on permitting and enforcement issues due to agency staffing shortages that result in delays, shortcuts, and failure to enforce laws and agreements.

leaders and residents raised these issues at the public hearing held on December 18, 2017.

Among the comments submitted were those presented by Advisory Neighborhood Commission 6D Commissioner Rhonda Hamilton requesting DOEE evaluate properly air emissions from the plant and provide sufficient conditions in the permit to control fugitive dust and harmful particulate matter that is expected to become airborne and fall on nearby streets, homes, and yards and may be washed into stormwater drains leading to the Anacostia River. DDOE is expected to make a final decision soon.

CLA volunteer attorney Bill Pedersen (Washington, DC) assisted Rhonda Hamilton review the draft air quality permit and assisted Ms. Hamilton in drafting comments to submit on the draft permit.

Now Hiring 2017 Summer Legal Interns!

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Nutrient Trading in Maryland – How and Where it can Work

Author Ridgway Hall, edited from original publication on Choose Clean Water Coalition blog

On December 8, the Maryland Department of the Environment (MDE) published proposed regulations to establish a water quality trading program for nitrogen, phosphorus, and sediment. A public hearing was held on December 18 and the deadline for written comments was January 8. The regulations were developed together with the Maryland Department of Agriculture (MDA) and a broadly representative Water Quality Trading Advisory Committee (WQTAC).

What is nutrient trading?

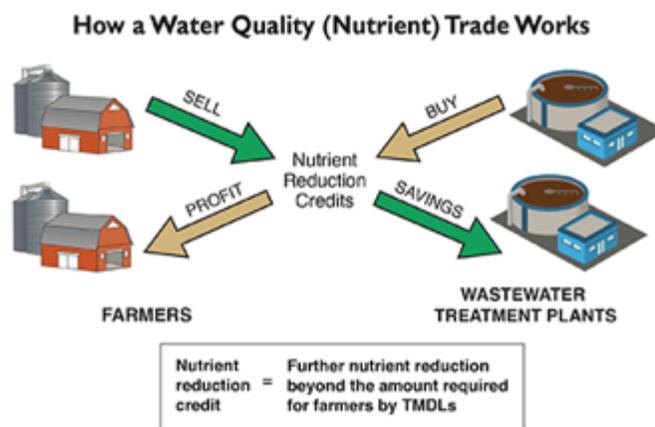
“Trading” allows an entity that can reduce one or more pollutants more cheaply than another to install pollution control measures that provide a greater reduction than required by law, and sell the excess reduction, or “credit”, to another discharger for whom the cost of pollution reduction is greater. The result is that the credit generator makes money for the sale of credits, and the buyer saves money by using the credits to meet its discharge limitations less expensively, achieving the same overall reduction at a lower cost. In a time when funding is tight, this can result in a bigger bang for the buck in meeting the Bay Total Maximum Daily Load (TMDL) or “Bay Clean Up Plan” goals.

How can trading work properly?

To work properly, a program must ensure that a trade does not cause or contribute to a violation of any water quality standard or TMDL. A trade should also result in overall net pollution reduction - a feature known as “additionality.” When this happens, there is not only lower cost compliance, but an overall reduction in pollution.

Before a discharger can generate a credit, it must comply with all pollution reductions required by law, referred to as its “baseline.” Reductions beyond baseline generate “credits.” Credits can also be purchased to “offset” a new or increased discharge, which is required for such discharges to a water body not meeting water quality standards.

To be sure that trading is carried out in compliance with the Clean Water Act (CWA), EPA issued series of Technical Memoranda (TMs) setting forth its “expectations” for key elements that must be incorporated into any trading program in the Chesapeake Bay watershed. These key elements include determining baseline, protecting local water quality, duration of credits, credit calculation, accounting for uncertainty of the water quality benefits delivered by a best management practice (BMP) installed by a non-point source discharger, representative sampling, and credit certification and verification. They also call for establishment of a publicly available “credit registry” on which each credit can be registered and tracked, and an opportunity for notice and comment at meaningful times in the process. MDE’s regulations must be evaluated under these criteria to determine how they will fare when reviewed by EPA for compliance with the CWA.



The proposed regulations cover baseline determinations plus calculation, certification and use of credits, and trading procedures. When a discharger buys a credit, the credit is incorporated into its National Pollution Discharge Elimination System (NPDES) permit. The buyer/user is liable for ensuring permit compliance, even if the BMP on which the credit is based fails. Any performance failure by the credit-generating practices should be addressed in a contract between the seller and buyer.



Tell me more about the online trading registry...

The regulations provide for an online registry under which each credit, when certified by the agency, is assigned a number, and is tracked through its lifetime. Credits are expressed in terms of pounds of a pollutant. Procedures are established for inspection and verification that the credit practices are performing properly. The regulations also provide enforcement measures, including corrective action orders, suspension from the program and other sanctions, and an appeal process.

Credits generated by farming operations are reviewed and certified by MDA under regulations issued in 2016 (COMAR 15.20.12). Those regulations are designed to work in conjunction with the trading regulations proposed by MDE, on which both agencies collaborated.

While the credit registry will be publicly available, the only opportunity for public comment under the proposed regulations is when a credit buyer proposes to use a credit in its NPDES permit, not at the time of credit certification. Because credit certification is when the agency determines whether baseline has been met and whether the credits have been properly calculated using approved methods, some contend that the public should be allowed to comment at this earlier stage to address effectively key issues in the credit generation and calculation process.

What are some issues with the Maryland Nutrient Trading Program?

As the regulations were being developed in consultation with the WQTAC, not surprisingly, there were disagreements over some of the provisions. Issues debated included adequacy of protection for local water quality, clarity of the baseline requirements, adequacy of the uncertainty ratio, certification and verification procedures, and public participation. For example, on local water quality, the proposed regulations, to their credit, provide that when the water body where the credit will be used is “within any impaired waters” (does not meet water quality standards), the credit must be generated in the same sub-watershed. While the proposed regulation also appears to require that the credit should be generated upstream of the user, that is not clear in the text. Furthermore, outside of those circumstances, trades are allowed within

any of three broadly defined regions: the Potomac River basin, the Patuxent River basin, and the Eastern Shore and Western Shore river basins, including the Maryland portion of the Susquehanna River. While in theory a credit generated on the Eastern Shore that is used on the Western Shore might result in no net adverse effects in the middle of the Chesapeake Bay, the credit will not protect the water quality in the place of use on the Western Shore.

EPA’s applicable technical memorandum provides that the uncertainty ratio should be presumptively 2:1 when a credit is generated by a non-point source, to account for the uncertainty in the pounds of pollutant reduction which a particular BMP will actually produce. MDE’s regulations prescribe this ratio where credits generated by a non-point source are used by a wastewater treatment plant, but fail to do so where the user is a stormwater point source discharger. The reason for this distinction is unclear.

MDE proposes creating a “reserve pool” by imposing a 5% reduction (a “reserve ratio”) in the number of credits generated in any transaction to be set aside for use in situations such as replacement of credits that underperform or a lack of available credits. If not used for these purposes, any part of the reserve pool can be retired permanently so that the result is an improvement in water quality, but there is no obligation to do this. A “retirement ratio”, by contrast, would require the entire amount to be retired, thereby ensuring that each trade results in a net improvement in water quality (the “additionally” referred to above). The regulations do not include such a retirement ratio.

EPA has been promoting trading for over 20 years, but only eleven other states, including Pennsylvania and Virginia, have trading programs. Programs continue to evolve, and their effectiveness have yet to be determined; effective implementation is proving challenging.

MDE’s proposed regulations will stimulate lively discussions of the issues facing any trading program, especially when the credits will be generated mostly, if not entirely, by nonpoint sources. However, MDE believes that, if a truly effective trading program is implemented, the benefits will outweigh the risks that are inherent in a program where the water quality benefits of various BMPs may not be determined until years after they are installed.



This article is a modified version of blog posts Ridge created for the Choose Clean Water Coalition, focused on the recent Government Accountability Office Report (Oct. 2017) surveying the status of trading across the country, and a blog for the American College of Lawyers (posted Nov. 28, 2017). Ridge also drafted model comments for Choose Clean Water Coalition, Blue Water Baltimore, Potomac Riverkeeper Network, and other partner organizations regarding the proposed regulations discussed in this article (Subtitle 8, Chapter 11 Water Quality Trading Program regulations), and he is assisting the Maryland Clean Agriculture Coalition and the Choose Clean Water Coalition with a review and analysis of the proposed regulations. Ridge is a member of CLA's Board of Directors, and a retired partner of Crowell & Moring (Washington, D.C.), where he founded the firm's environmental law group

NEW ATTORNEYS

During 2017, Chesapeake Legal Alliance staff set a daunting goal of adding 100 new legal providers to its volunteer network. Not only did we meet that goal, but we exceeded it, and ended the year with 294 attorneys, 106 law firms, 9 legal clinics, and 7 other legal providers – all of whom are ready to take on legal issues for the benefit of the Chesapeake Bay, and its lands, rivers, and streams. Each provider added to our network is a potential resource for our partners, as well as for clients throughout the Bay watershed who benefit from legal assistance in their fight for cleaner water and a healthier future.



CLA Fellow Becomes Natural Resource Planner for Maryland Department of the Environment

Congratulations to CLA Law and Policy Fellow Hannah Brubach on accepting a position as Natural Resource Planner on climate issues for the Maryland Department of the Environment (MDE). Hannah is providing legal and policy input on Maryland's participation in the Regional Greenhouse Gas Initiative (RGGI) and serving on the Maryland Climate Change Commission, Education, Communication, and Outreach Working Group. While with CLA, Hannah researched and evaluated laws and regulations that protect the Chesapeake Bay, its lands, and waterways, and helped track and analyze Bay TMDL Phase III Watershed Implementation Plan development.

CLA Helps Eastern Shore Groups Build Regional Program Through Merger

Congratulations to Midshore Riverkeeper Conservancy, Sassafras River Association, and the Chester River Association on their recent merger. CLA Volunteer attorneys Scott Gluck, Amauri Costa, and Law Clerk Alison Hopkins (Duane Morris LLP) assisted the organizations in drafting the merger agreement and closing documents to facilitate the merger process. Mr. Gluck and Mr. Costa practice corporate law and provide a great example of the wide range of legal assistance CLA attorneys provide to watershed groups to help them advance their missions.



The regional organization has adopted the new name, ShoreRivers. The organization will provide Eastern Shore communities a stronger voice and greater ability to restore and protect waterways locally and regionally. ShoreRivers has seventeen employees including four Riverkeepers - one each for the Choptank, the Miles and Wye, the Chester, and the Sassafras Rivers.

CLA is proud to have helped facilitate this new chapter for water quality protection and restoration on the Eastern Shore and wishes ShoreRivers much success in the coming year.



New CLA Matters

UVA Environmental and Regulatory Clinic (Charlottesville, VA) and **Jill Grant** (Jill Grant & Associates, D.C.) have drafted and filed an amicus curiae brief on behalf of the **Mattoponi Tribe** in a case filed against the US Army Corps of Engineers by the National Trust for Historic Preservation in the US District Court for the District of Columbia over Virginia Electric & Power Company's (a.k.a. "Dominion") proposal to build overhead electric transmission lines across the James River.

Theodore Garrett, Thomas Brugato, and Patrick Phelan (Covington & Burling, Washington, D.C.) assisted **Blue Water Baltimore** oppose and negotiate portions of the Baltimore Sewage Infrastructure Consent Decree.

Alex English (GreenSpring Legal, LLC, Silver Spring, MD) will assist **Dorchester Citizens for Planned Growth** (DCPG) challenge MDE's response to the Midshore Riverkeeper Conservancy (MRC) and DCPG's Public Information Act request for the application and other agency documents related to Valley Protein's application for significant modifications of its NPDES permit.

Caroline Gaudet (Stephoe & Johnson LLP, Washington, D.C.) will assist the **Lower Shore Land Trust** evaluate two land conservation easements and title reviews to ensure these legal documents meet all state and federal requirements and are enforceable. Caroline will also assist the land trust in conducting its own independent review of these documents as well as review its internal record keeping procedures to ensure it is maintaining sufficient records to enforce the easements it holds in trust.

Bill Bierbower (Severna Park, MD) will review and analyze general NPDES permits and other construction permit applications filed for CAFOs on the Eastern Shore of Maryland to help **CLA** track proposed CAFO facilities.

CLA Intern Mariel Yarbrough is assisting the **Mahoopany Creek Watershed Association** with research regarding a proposed natural gas pipeline that would go through its local watershed. MCWA is interested in learning what permits the pipeline would need and how they can engage in any public participation process.

Phillip Chalker (Law Office of Phillip Chalker, Baltimore, MD) is assisting a **regional environmental group** with an in-depth analysis of the differences between what blue catfish processors were required to do under federal law before a September 1, 2017 change to inspection requirements, now under USDA jurisdiction.

CLA Intern Stephen Milak researched the structure of the Virginia and Pennsylvania NPDES permit programs to support a **CLA/Midshore Riverkeeper Conservancy** presentation to train waterkeepers and

other environmental leaders how to use the CLA/MRC Maryland NPDES guide.

Ridgway Hall (Washington D.C.) is assisting **Blue Water Baltimore** in its negotiations with Tradeport Atlantic regarding the company's application to alter and amend the existing US Army Corps of Engineers Maintenance Dredge Permit for the Baltimore Harbor.

Alexandra Wyatt (Congressional Research Services, D.C.) and **Mona Zhe** (Patent and Trademark Office, D.C.) are assisting the **Assateague Coastal Trust (ACT)** with review of a Maryland Department of Environment (MDE) decision to administratively renew the General Discharge Permit for Discharges from the Application of Pesticides - Maryland General Permit No. 11-PE.

Jennifer Mozwez (Shams, Rodriguez & Mozwez, P.C., Illinois) will assist the **Mehoopany Creek Watershed Association** review a pending NEPA review for a 50-year Endangered Species Act Incidental Take Permit applied for by nine oil and gas companies that operate individually within Pennsylvania, West Virginia, and Ohio. The companies are asking the U.S. Fish and Wildlife Service for permission to kill or disturb five endangered bat species.

Bill Bierbower (Severna Park, MD) will provide **Back Creek Conservancy (BCC)** with ongoing general advice and counsel as required by BCC.

Michelle Stanfield (Baltimore, MD) and **Bill Pedersen** (Washington, D.C.) will assist **Dorchester Citizens for Planned Growth (DCPG)** in reviewing a forthcoming draft Clean Water Act, National Pollutant Discharge Elimination System (NPDES) permit for a poultry rendering recycling facility owned by Valley Proteins, located in Linkwood, MD.

Ridgway Hall (Washington D.C.) -Nutrient Trading work. Ridge drafted model comments for **Choose Clean Water Coalition, Blue Water Baltimore, Potomac Riverkeeper Network, and other partner organizations** regarding MDE's proposed Subtitle 8, Chapter 11 Water Quality Trading Program regulations for Maryland; analysis for Maryland Clean Agriculture Coalition and the Choose Clean Water Coalition; blogs on trading for the Choose Clean Water Coalition and American College of Lawyers.

Michelle Stanfield (Baltimore, Maryland) will assist **ShoreRivers** with research and analyze case law and Maryland Attorney General Opinions to identify when





New Matters continued...

state agencies are approving or denying Maryland PIA request fee waivers from environmental groups, and if there is any pattern of illegal denials.

Ryan Kennedy (Law Office of Ryan Kennedy, Annapolis, MD) is assisting **Gravelly Property Owners Association** with review and analysis of a memorandum of understanding entered between the home owner's association and Anne Arundel County regarding a stream restoration project.

Michelle Stanfield (Baltimore, MD) will provide **Blue Water Baltimore** ad hoc legal assistance on water quality projects, including contractual matters, legal research, legislative and policy work, and other types of analyses relating to water quality issues.

Ryan Kennedy (Law Office of Ryan Kennedy, Annapolis, MD) is assisting the **Arnold Preservation Council** to oppose a proposed subdivision and development of a property located in Arnold, MD.

Bill Pedersen (Washington, D.C.) is helping **ShoreRivers** understand the regulatory framework for an energy project involving construction of a gas pipeline from Wilmington, DE to Cape Charles, VA, and helping the organization develop strategy to address possible pollution concerns during public hearings and meetings.

Richard Klein (Zoning and Planning Expert, Washington, DC) is assisting the **Rockaway Beach Improvement Association** to determine whether a proposed development may be granted a limited exemption to proceed with an alternative development layout, specifically whether the proposal meets all required setbacks from areas zoned open space and existing wetlands.

Ridgway Hall (Washington, D.C.) is assisting a group, led by the **Choose Clean Water Coalition**, with drafting comments to Maryland Department of the Environment regarding its pending decision to approve or reject Exelon's application for 401 Water Quality Certification under the Clean Water Act, which Exelon is requesting as a necessary precondition of its related application to the Federal Energy Regulatory Commission ("FERC") for a new license for the continued operation of the Conowingo Dam Project.

Abigail Benjamin (Law Office of Abigail Benjamin, Martinsburg, WV) is assisting the **West Virginia Rivers Coalition** with drafting comments and attending public hearings regarding the proposed Atlantic Coast Natural Gas Pipeline and the Eastern Panhandle Expansion Project. Abigail will continue to assist WVRC through the appeals process with the State Environmental Quality Board if the project is approved.

Bill Bierbower (Annapolis, MD) is assisting **South River Federation** with review and drafting of general language that SRF uses in contracts governing its work with contractors on SRF restoration projects.

Ryan Kennedy (Law Offices of Ryan Kennedy, Annapolis, MD) is assisting the **Magothy River Association** with review and analysis of possible opposition strategies to a proposed variance for residential development within the critical area along Old Man Creek in Severna Park, MD.

Bill Pedersen (Washington, D.C.) assisted **Rhonda Hamilton** (Advisory Neighborhood Commission 6D Commissioner and a resident of Buzzard Point) in drafting comments to submit to the D.C. Department of Energy and Environment regarding a draft air permit for a cement plant to be relocated within the Buzzard Point community.

CLA Intern Hanna Brubach researched which counties created local plans during Phase II WIP development and which did not. She also analyzed those plans created to determine effectiveness and usefulness as models for Phase III plan development.

Ridgway Hall (Washington D.C.) and **CLA Staff Attorneys Mary Clemmensen and Molly Brown** assisted **Maryland League of Conservation Voters**, the Maryland state lead for the Choose Clean Water Coalition (CCWC), to co-host a meeting for CCWC partners regarding Maryland's Phase III WIP Development involving a presentation on WIP development from Maryland Department of the Environment, a panel discussion of county representatives, and a CCWC member discussion of issues and strategy planning.

CLA Staff Attorney Mary Clemmensen, in partnership with **Midshore Riverkeeper Matt Pluta and CLA volunteer attorney Jill Grant** (Jill Grant and Associates, Washington, D.C.), created a National Pollution Discharge Elimination System (NPDES) Permit Citizens Training Guide, presented at the 2017 Chesapeake Bay Watershed Forum and the 2017 Waterkeepers Chesapeake annual retreat.

Ridgway Hall (Washington, D.C.) assisted the **Lower Susquehanna Riverkeeper** draft comments submitted to EPA on Pennsylvania's failure to list the Lower Susquehanna on its impaired waters list. Ridge is also exploring whether litigation can be brought to challenge EPA's decision on this issue.

Annual Campaign Report

We raised a record **\$68,000**
THANKS to YOU! We can now
do more work for the health
of the Bay and its lands and
waterways!



New Legal Developments

Supreme Court Decides Clean Water Rule Jurisdictional Question – Further Complicating the Future of the Clean Water Rule



On January 22, 2017 the U.S. Supreme Court ruled that ongoing cases litigating the validity of U.S. Environmental Protection Agency’s 2015 Clean Water Rule should be heard by federal district courts. Generally, challenges to EPA final actions may be

filed in federal district courts, but the Clean Water Act allows some EPA actions under this law to be reviewed directly and exclusively in federal courts of appeals.

This outcome has no impact on the merits of the pending cases, and lifts the nation-wide stay imposed by the Sixth Circuit. However, this decision will only complicate EPA’s plans to repeal and replace the 2015 Clean Water Rule. As we reported in our Summer 2017 newsletter, EPA and the Army Corps of Engineers released a pre-publication proposed rule to repeal the 2015 Clean Water Rule regulation. The repeal and replace process may take several years to complete. Plus, through yet another proposed rule, EPA is attempting to delay the effective date of the Clean Water Rule by two years. The overlapping rulemaking processes will further complicate the application of the Clean Water Rule.

Read the Supreme Court decision here: https://www.supremecourt.gov/opinions/17pdf/16-299_8nk0.pdf

Read EPA’s Proposal to add an applicability date to the Clean Water Rule here: <https://www.epa.gov/wotus-rule/rulemaking-process#amend>

The Ninth Circuit continues to Use Significant Nexus Test to Define “Waters of the United States”



The Ninth U.S. Circuit court of Appeals used Justice Anthony Kennedy’s “significant nexus” test to uphold a criminal conviction for violating wetlands laws under the Clean Water Act (CWA). The court found the test for defining which waters EPA and the U.S. Army Corps of Engineers have jurisdiction over under the CWA is properly defined by Kennedy’s test set out in his opinion in *Rapanos v. United States* (2006). As we reported in our Summer 2017 newsletter, EPA is currently seeking to change this test through a repeal and replace process of the Clean Water rule.

Virginia Eastern Shore Town Adopts Increased Setback Buffers for Farms

The town of Painter, Virginia adopted stricter zoning regulations for animal feeding operations (swine, cattle, poultry) that will require 600-foot setbacks from adjoining property lines and a minimum parcel size of 60 acres per operation. Painter is an incorporated town in Accomack County on Virginia’s Eastern Shore. The town’s requirements are stricter than the zoning requirements the county of Accomack requires and are similar or less strict than those in place in Northampton, Virginia and Dorchester and Kent Maryland. Painter Planning Commission members discussed the desire to increase setbacks in the future, but first plan to explore how to implement stricter requirements while maintaining the agricultural zoning designation.

You can read more here: <http://www.13newsnow.com/news/local/virginia/accomack-town-approves-stricter-poultry-regulations-than-countys/508622586>



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