



February 8, 2018

Honorable Benjamin Grumbles, Secretary  
Lynn Buhl, Assistant Secretary

Office of Secretary  
Department of the Environment  
Montgomery Park Business Center  
1800 Washington Blvd.  
Baltimore, MD 21230

Dear Secretary Grumbles and Assistant Secretary Buhl,

Resource Environmental Solutions (RES) appreciates the opportunity to submit the following in response to the public comment period for the Maryland Department of the Environment's final water quality trading regulations published December 8, 2017 in the Maryland Register.

We want to commend and thank you and your staff for the professionalism and diligence to engage and listen to all stakeholders throughout the development of the trading regulations. Although we have some lingering questions and concerns regarding implementation of the final regulations as it pertains to credits from publicly funded wastewater treatment plants, as previously shared in our written comments dated October 7, 2017, we are grateful for your and the Governor's vision and willingness to try something innovative and outside-the-box, which prior Administration's failed to do.

The ultimate proof of success, however, will be market-based activity that results in accelerated restoration of the Chesapeake Bay and the watershed. Toward this end, we would urge you to accelerate the development of clear and rigorous standards for "Aligning for Growth" to address the issues of current and future growth in Maryland affecting the State's water quality.

We remain willing and eager to support the new program and ongoing efforts. Please do not hesitate to contact me if we can be of further assistance in supporting your efforts to restore the Bay.

Sincerely,

A handwritten signature in blue ink, appearing to read "George Kelly", is written over a light blue circular stamp.

on behalf of

George Kelly  
Chief Markets Officers

Cc: TJ Mascia