

Maryland Department of Agriculture AgWG Update

WQGIT
July 8, 2013

WQGIT Proposal

- MDA is supportive of the BMP evaluation process being implemented by the four expert review panels under the oversight of the AgWG.
- MDA is appreciative of efforts by the panels to develop short-term Phase 5.3.2 recommendations, which should improve current BMP model limitations.

WQGIT Proposal

- MDA acknowledges that even with partnership approval of Phase 5.3.2 BMP modifications in 2013, there will still remain BMP reporting limitations for representing progress on the State's Milestone goals.
 - Existing BMP Modifications for Progress
 - Interim BMP Approvals for Progress
 - New BMP Approvals for Progress

WQGIT Proposal

- Impacts to Maryland Progress Runs
 - Four existing approved BMPs are represented for progress but are currently capped out for available acreage in the Phase 5.3.2 models.
 - Three existing approved BMPs (cover crops, CNT and NM) may be modified in 2013 depending on partnership approval of the panel recommendations.
 - A comprehensive approach to Non-Cost Shared BMPs through the BMP verification protocol process is not yet in place.

WQGIT Proposal

- Impacts to Maryland Progress Runs (cont.)
 - Nine interim approved agricultural BMPs included in the State's Phase II WIP, currently represented in the Phase 5. 3.2 models for planning purposes only.
 - Three of these interim approved agricultural BMPs are included in the State's regulatory programs and are not eligible for representing progress.

WQGIT Proposal

- Impact to Maryland Progress Runs (cont.)
 - Summary:

The combination of the above items results in 19 of the 39 agricultural BMPs in the Maryland Phase II WIP (50% of agricultural tracking), being capped out, not available for current credit, or applied against what MDA believes is an understated efficiency.

WQGIT Proposal

- MDA Proposals to WQGIT
 - MDA requests that EPA formally acknowledge the Phase 5.3.2 modeling limitations for the jurisdictions in obtaining progress credit for their current Milestone and WIP goals.
 - MDA requests that EPA reserve any federal policy decisions on Milestones and WIP implementation based on the jurisdictional progress runs until such modeling credit limitations are resolved.
 - MDA requests that EPA should instead evaluate progress based on the number and acres of BMPs committed to by the jurisdictions in their Milestones and WIPs.