

April 12, 2019

Dana Aunkst
Director, US Environmental Protection Agency
Chesapeake Bay Program
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Dear Director Aunskt:

As leaders representing Agriculture in our respective States and Commonwealths we write this letter to request the assistance of the US Environmental Protection Agency Chesapeake Bay Program (EPA CBP) to adequately account for the water quality benefits of improving soil health conditions so that this critically important outcome can be integrated into our Phase III Watershed Implementation Plans (WIPs). This need was identified during a February, 2019 breakfast meeting we attended convened by the Chesapeake Bay Funders Network during the NASDA Winter Policy Conference in Washington, DC.

As you know, assisting our farmers to make continuous improvements to the health of their soils has been and remains a top priority for our departments and our local and federal conservation partners. There are many benefits of improved soil health for the producer as well as the environment. By bundling healthy soils practices together (such as cover crops, no-till, crop rotation, and others), farmers can restore the natural ability of soils to nourish plants, absorb and retain water, store carbon, and increase productivity. Healthy soil is increasingly recognized as vital for increasing nutrient value, productivity, and profitability, as well as water quality. In light of the rapidly growing interest and potential increases in producer incentives, momentum is building to ramp up implementation of the suite of practices that lead to greater soil health outcomes.

In Pennsylvania, this has already been reflected in draft Phase III WIPs based on input from many stakeholders who also see soil health as a driver for conservation efforts on the ground. Other Basin States have also been advancing statewide initiatives to improve soil health. Interest and financial support from non-governmental sectors including conservation groups, philanthropy and the private sector is growing.

Water quality is one of the known benefits of long term improvements to soil health; however, it is not entirely clear the extent to which those benefits are accurately reflected in the Bay Model and as such able to be effectively incorporated into our agricultural WIPs.

Accordingly, we respectfully convey the following requests and recommendations:

- Immediately communicate the status of EPA's ability to quantify the water quality benefits of soil health practices in the Bay model and how they can be integrated into

State Phase III WIPs to State departments of agriculture and other appropriate agencies involved in development of the WIPs. Specifically, EPA CBP modeling should run scenarios developed by the states to assess the nutrient and sediment reduction benefits of specific soil health programs and practices that the states are considering in Watershed Implementation Plans.

- Hold a Scientific and Technical Advisory Committee (STAC) workshop to review the current methodology to track and account for soil health benefits, identify data gaps, variations in practices and timing of implementation, changes to nutrient application rates, impacts of shifts in cropping systems and types, and other variables not currently accounted for that would more accurately account for reductions of nutrient and sediment loads associated with comprehensive approaches to improving soil health.
- Engage Land Grant Universities to better define how healthy soils affect nutrient application rates over time, and encourage them to update their agronomy guide nutrient application recommendations to better reflect agronomic nutrient needs for these healthy soils. These revised nutrient application rates could be built into state programs and into the Bay model to more accurately predict the impact of healthy soils on water quality. We would be happy to provide you with contact information for experts within our respective Land Grant Universities.
- Charge the appropriate group within the Bay Program Partnership to work with the Chesapeake Bay Funders Network to convene soil health leaders and practitioners from throughout the region to share best practices, align and coordinate programs and build capacity to ramp up state based efforts to advance soil health.

We are committed to working with your office to achieve the shared goals of a healthy Bay and healthy waterways throughout the Basin while ensuring a vibrant and resilient farm economy. Accounting for the proven benefits of soil health practices is an important step toward achieving these goals. We look forward to working with you in the coming weeks.

Thank you for your consideration of this request. You may direct any questions or responses to the points of contact within our agencies provided in the table below.

Sincerely,

Russell Redding, Secretary
PA Department of Agriculture

Joe Bartenfelder, Secretary
MD Department of Agriculture

Michael Scuse, Secretary
DE Department of Agriculture

Kent Leonhardt, Commissioner
WV Department of Agriculture

Bettina Ring, Secretary
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