



Citizens Advisory Committee

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December 10, 2014

Ms. Kristen Saacke Blunk
Mr. John Roderick
Agricultural Workgroup
Water Quality Goal Implementation Team
Chesapeake Bay Program

Via Email

Dear Agricultural Workgroup Co-Chairs,

At our quarterly meeting on November 20-21, 2014, the Citizens Advisory Committee (CAC) learned about a proposal being considered by the Agricultural Workgroup to almost double the credit for Nutrient Management Plans (NMPs) in the Bay Program computer model prior to the completion of the BMP verification protocols. We are writing to express our deep concerns about this proposal.

The CAC has been a strong proponent of the BMP verification protocols as a means to ensure accountability and to gain a better understanding of what the agricultural sector is doing to reduce nutrient, phosphorus and sediment pollution -- what agricultural practices are working, which ones aren't working, and potential ways the industry can help accelerate the watershed recovery effort. In our judgment, giving nearly double credit for plans -- without verifying that those plans are actually being implemented -- undermines the credibility of the Bay model and the confidence of citizens that the single largest source of pollution to the Bay is being addressed. Indeed, it is our understanding that a review by the Environmental Integrity Project of nutrient management plans in Maryland suggests that even current credit given in the Bay model for NMP implementation may be excessive, as many farms have not even filed the required plans or annual reports.

As you know, the Water Quality Goal Implementation Team's Protocol for Development, Review, and Approval of Loading and Effectiveness Estimates states that "since the definitions and values used for both loading and effectiveness estimates have important implications for the CBP, it is critical that they be developed in a process that is consistent, transparent, and scientifically defensible (underscore emphasis added)." We believe the proposal for double-crediting NMPs in the model is inconsistent with that Protocol



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and with the commitment of the Chesapeake watershed partnership as expressed in the Preamble to the Chesapeake Bay Watershed Agreement to improve “*verification and transparency of its actions to strengthen and increase public confidence in its efforts.*”

We urge you to suspend any efforts to provide additional credits in the model for NMPs until the BMP verification protocols are completed and the credits are found to be verifiable and scientifically defensible.

Your attention to this matter is appreciated and we look forward to hearing from you.

Charlie Stek
Chair, Citizens Advisory Committee

cc: Management Board
Principals’ Staff Committee



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