**Wetland Expert Panel Recommendations: Concerns**

1. **Landscape position vs. vegetation class**

The Expert Panel report clearly acknowledges that the most important factor to consider in regard to wetland loading and retention rates is landscape position. It is unclear why a unique land use classification for wetlands could not be established, given the extensive literature on wetlands and their role in nutrient processing and sediment retention, and including references provided to the panel which include loadings into and exiting from wetlands.

The rationale for changing from a wetland classification system based on landscape position to a system based on vegetation type is not described.  Maryland has nearly completed its mapping effort to distinguish between estuarine, floodplain, and headwater wetlands and believes that a landscape approach is more reflective of relative effectiveness in nutrient and sediment retention or transformation.

The literature review indicated: 1) wetland nutrient and sediment retention efficiency varies widely among wetlands, from less than 0 to 100%; and 2) retention largely depends on the relative importance of ground- and surface-water inputs and hydrologic exchange rates. Further, there was ample evidence to conclude that potential for denitrification or sediment deposition depends upon landscape position. The literature review did not reveal any close linkages between wetland water quality function and vegetation cover type, nor did it suggest that vegetative structure relates to landscape position.

While there are strong patterns among wetland community, hydroperiod, and water chemistry, differentiating wetlands based on cover type (emergent, scrub/shrub, or forest) does not capture these linkages or adequately capture attributes of landscape setting.

Even a cursory split of floodplain versus non-floodplain wetlands would be useful for delineating wetland landuses and the basis for considering efficiencies for wetland restoration and enhancement BMPs.  This should be (quickly) achievable using NWI and SSURGO soils.

1. **Justifications and documentation**

It is important that the Wetlands Expert Panel state the justification for explicitly mapping wetlands and wetland effects on downstream water quality (i.e., for their unique efficiencies).

Provide justification for the decision to exclude tidal wetlands because of their inclusion in the estuarine model. Include a description of how these wetlands are represented in the estuarine model and an assessment of whether the model adequately address the concerns of the Wetlands Expert Panel. It also may be helpful to evaluate the consistency of how nontidal and tidal wetlands are modeled.

1. **Additional approaches**

MDE requested consideration of applying the SPARROW model to wetlands as a land use, as was done for forest land.  This effort could not be investigated nor completed in the time frame allotted to the expert panel.

MDE believes that with additional effort, it is possible to recognize the unique contributions of wetlands in natural nutrient and sediment processing, which differ in certain aspects from nutrient and sediment pathways in upland forest. Appropriate recognition to the documented benefits of wetlands has the potential to reduce load allocations for some jurisdictions, and thus reduce the extent of additional best management practices needed to comply with current load reduction requirements.

1. **Wetland Workgroup must approve Expert Panel Recommendations**

The Expert Panel recommendations were to be reviewed and approved by the Wetland Work Group prior to advancing in Chesapeake Bay Program Review.  The Wetland Work Group has not approved these recommendations to date. The Expert Panel report does not have the endorsement of the Wetland Workgroup and we do not recommend that the WQ GIT vote on this until the WWG has had a chance to comment.  We also feel that the Ag Workgroup should have an opportunity to review and provide input.