

Urban Nutrient Management Panel Recommendation Review Comments

December 17, 2012

The Agriculture Workgroup wishes to acknowledge the work of the Urban Stormwater Workgroup and the associated Urban Nutrient Management panel, and appreciates the opportunity to provide comments and recommendations. The Agriculture Workgroup has established an agriculturally focused nutrient management panel which is currently evaluating the Chesapeake Bay Program modeling suite's representation of nutrient management systems being implemented by the agricultural sector. The comments provided herein represent a review of the urban nutrient management panel recommendations from the standpoint of agricultural nutrient management systems and the preliminary considerations of the workgroup's respective panel.

1. The use of the term "nutrient management plan" in reference to the title of the agricultural CBP modeling BMP has caused considerable confusion amongst the partnership and stakeholders. Nutrient Management Plans (NMPs) in function are much more complex planning systems than the CBP models currently represent in the NMP BMP. In practice, the CBP models represent NMPs through multiple modeling BMPs. The agricultural NMP is considering renaming the BMP to avoid or reduction future confusion on the actual modeling representation of managing nutrients on the agricultural landscape.

Recommendation: The Urban Nutrient Management panel should consider avoiding the use of the term "nutrient management plans" as the active element of the BMP definition and instead focus on the management of nutrients through active management systems.

2. The panel recommendations include a N and P Credit option for implementing alternative outreach for a three-year CBP modeling credit of 3% of the N load. The concept of crediting educational outreach for urban nutrient reduction credits is controversial to the agricultural sector. A similar comparison in agriculture would be the nutrient reduction crediting of agricultural operators by their attending land grant university cooperative extension workshops related to the management of nutrients. In light of the environmental community's continued concerns that acres being managed under certified and reviewed agricultural NMPs are potentially receiving a higher nutrient reduction value than is warranted, it would be difficult to comprehend a similar agricultural nutrient reduction modeling credit for educational outreach alone. Implementing an equality between the urban and agricultural sectors should be considered.

Recommendation: The Urban Nutrient Management panel should consider removing the current proposal for allowing CBP model nutrient reduction credits for implementing alternative outreach.

3. The panel recommendations address the verification of future reported urban NM data to the CBP models for nutrient reduction credits. It is fully acknowledged that the partnership is currently in the midst of developing a data verification process and procedures for all sectors, and that the final outcome is still several months away. However, the sectors workgroups have been active in developing and recommending draft verification protocols to the Water Quality Goal Implementation Team's (WQGIT) Verification Steering Committee and most recently the independent Verification Review Panel. The Agriculture Workgroup has been vocal from the initiation of the partnership's decision to develop verification principles and protocols that a comprehensive equality of verification requirements should be developed and implemented across all of the sectors, including urban. The workgroup has acknowledged that there are inherent differences between the sectors and the BMPs that they will need to verify, thus requiring differences between the verification protocols and methods. Even so, the degree of data certainty and scientific rigor should be comparable between the sectors. The reporting and verification of urban NM BMP credits does not appear to currently incorporate the degree of certainty and scientific rigor being considered by the Agriculture Workgroup, and other sector workgroups.

Recommendations: The Urban Nutrient Management panel should consider the degree of BMP data verification certainty and scientific rigor being currently incorporated in the recommendations to achieve a higher level of equality with comparative sector verification efforts and proposed protocols.

4. The Agriculture Workgroup has received an initial presentation by the Urban Stormwater Workgroup (USWG) on the previous draft version of the panel recommendations being discussed today. In light of the review comments included in this memo, the comments vocalized by partners, as well as the changes incorporated in the present document, the workgroup would appreciate the opportunity to have the new version of the recommendations presented during their January 10, 2013 meeting to obtain additional comments and suggestions.

Recommendations: The Urban Stormwater Workgroup consider an invitation from the Agriculture Workgroup to provide a second presentation on the Urban Nutrient Management panel final recommendations, and that this discussion occur prior to the final panel document being presented to the WQGIT for review and approval.