UNIVERSITY OF MARYLAND

1439 Animal Science/Ag. Engineering Bldg.
College Park, MD 20742 USA
TEL: +1-301-405-0505
FAX: +1-301-314-9023
fjcoale@umd.edu

Department of Environmental Science and Technology

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To: Richard Batiuk
Chair, BMP Verification Steering Committee
Chesapeake Bay Program Partnership

From: Frank J. Coale
Chair, Agriculture Workgroup
Chesapeake Bay Program Partnership

Thank you for providing the Agriculture Workgroup (AgWG) with the opportunity to present the current state of our evolving concepts regarding development of BMP verification protocols for agricultural practices at the BMP Verification Steering Committee on June 19, 2012. The AgWG's commendable progress in this area over the past few months has resulted from excellent collaboration among our diverse partners from federal and state agencies, local governments, academia, NGOs and the agricultural industry.

The AgWG members have clearly and consistently expressed their opinion that all source-sector workgroups should be developing BMP verification protocols which impose an equal level of rigor and accountability when compared across source sectors. The AgWG fully understands that appropriate BMP-specific verification procedures will require implementation of a diverse collection of verification methodologies. However, collectively, all source-sector workgroups must strive to achieve equity in verification rigor and accountability. For all source sectors, verification methodologies must be constructed to verify the relative functionality of all BMPs regardless of the physical location within the Chesapeake Bay Watershed, regardless of whether practices were installed as a result of regulatory mandate or voluntary implementation, regardless of whether installation was paid for by public or private funds, and regardless of whether or not the BMP exists within the scope of a regulatory permit.

The AgWG is of the opinion that the nascent BMP verification process offers the Chesapeake Bay Program partnership a great opportunity to establish an equitable and defensible verification protocol that may be implementable across the entire Bay watershed. To that end, it is critically important for the BMP Verification Committee to ensure that an equitable and balanced verification process is developed across all source sectors.