



February 28, 2023

Ohio EPA
Division of Surface Water
P.O. Box 1049
Columbus, OH 43216

Dear TMDL Program Administrators,

In reviewing the Draft Total Maximum Daily Load Report for the Maumee Watershed, we noticed that the 4R Nutrient Stewardship Certification Program was omitted from section 8.4, "Activities to meet the goal." As representatives of Ohio's farmers and businesses who provide essential services to those farmers, we feel this program should be held up as an example of significant actions taken by the agriculture industry to address nutrient losses into our waterways.

The 4R Nutrient Stewardship Certification Program is a voluntary, science-based framework that encourages agricultural retailers and independent crop consultants to adopt proven best practices to address nutrient loss from the agricultural landscape. This program was started in Ohio in March 2014 by agribusinesses, environmental organizations, and many other interested parties as a proactive, responsible approach aimed at long term improvement of water quality in the Western Lake Erie Basin.

The 4R Nutrient Stewardship Certification Program is managed by the Nutrient Stewardship Council, an entity made up of 11 directors. The directors include five representatives of agribusiness including one active grower and two representatives each from government, non-governmental organizations, and the university and/or research community. Nutrient service providers are annually audited by third party auditors who are independent agronomic experts. These thorough reviews of each participating facility ensure that they are meeting the standards set forth in the program. Each retail facility must meet 31 requirements based around education, training, and implementation of the 4R nutrient strategy. As an ongoing certification program, there are facilities that are in the first year of certification and facilities who have been in the program since the beginning, entering their 8th year of certification.

Since the program's inception, 55 nutrient service providers have voluntarily become certified, proving to their customers and the public that they have the best interest of farmers and the state's water quality in their core business practices. 45 of those facilities are in the Western Lake Erie Basin and provide nutrient recommendations and applications to nearly 3,000 farmers who cover 1.3 million acres

of farmland. Because of the success of this framework, the program has expanded to cover the entire state of Ohio and spread to five additional states and Ontario.

Ohio Corn and Wheat Growers Association, Ohio Soybean Association and the Ohio Agribusiness Association request that the above language be added to the TMDL report for the Maumee Watershed as nutrient service providers play a key role in working with farmers and addressing nutrient loss. We would be happy to provide additional documentation to further enforce the importance of this program in the Western Lake Erie Basin and Ohio.

Sincerely,



Christopher Henney, CAE
President and CEO



Tadd Nicholson
Executive Director



Kirk Merritt
Executive Director