

December 18, 2017

Secretary Benjamin H. Grumbles  
Maryland Department of the Environment  
Montgomery Park Business Center  
1800 Washington Blvd.  
Baltimore, MD 21230

Re: Maryland Water Quality Trading Program

Dear Secretary Grumbles:

I am writing today to comment on your department's draft plan to establish a Water Quality Trading Program in Maryland. I am the founder and president of Trout Headwaters, Inc., a private environmental banking and restoration company. THI has consistently advocated for high value, science-based private market solutions nationwide to compensate for unavoidable environmental impacts.

I humbly suggest that Maryland follow the successful example of Virginia's market-based Nonpoint Source Trading program. As I am sure you are aware, Virginia's program enables private investment and allows land conversion as well as resource restoration to generate credits that can be sold to offset nonpoint source nutrient discharge overages.

We believe that Maryland's landowners deserve the option of stewardship in land conversion, reforestation, and/or stream restoration. Private market solutions like nutrient banks are high-value, low risk ways to enable real progress for water quality in Maryland and the Chesapeake Bay. And, they do this at little or no cost to the taxpayer.

Thank you for your consideration and please contact me directly should you wish to discuss my thoughts on the Maryland Water Quality Trading Program.

Sincerely,



Michael A. Sprague  
President & CEO Trout Headwaters, Inc.