

AgWG Comments on Guidance and Submission Documents						
#	Document	Rec'd date	Comment	Provider	Proposed Change	Panel Action
1	Guidance and Submission Doc	6/24/2014	On page 3, first bullet: I think the word "voluntarily" should be added so it reads "Farmers and Agricultural landowners voluntarily install many BMP's..."	Lindsay Dodd <lindsay.mdag@gmail.com>	Word 'voluntarily' inserted.	APPROVED
2	Guidance and Submission Doc	6/24/2014	Somehow it needs to specify that all VI's on the worksheet for each RI must be present in order for it to qualify.	Lindsay Dodd <lindsay.mdag@gmail.com>	Added on pg 7 . " In order for a RI practice to be considered reportable the technical specialist will look at the RI practice Visual Indicators and see if they are present. All Visual Indicators must either have a Y or NA marked. If a N is marked on the checklist, the technical specialist may not report the RI practice, but they may use the opportunity to discuss the deficiency with the farmer." Placed this sentence at bottom of each VI worksheet-"All Visual Indicators must either have a Y or NA marked. If a N is marked on the checklist, the RI may not be reported until the deficiency is addressed."- to clarify when a RI is reportable.	APPROVED
3	Guidance	6/24/2014	Page 10 and 12, #3's supporting data and documentation should probably be "estimated by paces."	Lindsay Dodd <lindsay.mdag@gmail.com>	Changed to "Estimated by Paces"	APPROVED
4	Guidance	6/24/2014	Page 14 and 24, when it says appropriate lime and fertilizer was applied and the support is "owner interview," maybe something about nutrient management plan or application records could be included.	Lindsay Dodd <lindsay.mdag@gmail.com>	Leave as "Appropriate lime & fertilizer applied per state regulations" since Nutrient Management Plans are not required in all states. States may add each state specific regulation in their VI.	APPROVED
5	Guidance	6/24/2014	From a consistency perspective, on page 16 when it says there is a 10' setback the support is measurement but on pages 18 and 20 when the distance or width requirement is 10', the support is visual inspection.	Lindsay Dodd <lindsay.mdag@gmail.com>	Made all appropriate measurement documentation widths "Estimate by paces" Changes all "visual inspection" to "visual observation"	APPROVED

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6	Submission Doc	7/8/2012	pg 6-"I would not drop the terminology functional equivalents entirely because inherently resource improvement practices are functionally equivalent to NRCS practice standards if done with care, adequately sized for the situation, and maintained in a similar fashion."	James Cropper [jbcropper@yahoo.com]	Leave as "Resource Improvement Practice". The Review Team spent significant time in discussion about this title. NRCS supported this name change as the preferred name.	APPROVED
7	Submission Doc	7/8/2014	<i>Table 2 NRCS and RI Lifespans</i> -Lifespan of an RI is not necessarily shorter than a similar NRCS practice. Perhaps in the case of a structural practice, this might be the case. A concrete water trough might last longer than a portable Rubbermaid structural resin water trough, but the fact one is stationary and the other is portable has nothing to do with lifespan. The portable trough can be abandoned or removed easier than the concrete trough, but use of the term, lifespan, is inappropriate from a durability standpoint. A constructed grassed waterway can be as easily plowed out as a concentrated flow course left unplowed in a cropfield. The NRCS practice, grassed waterway, therefore, does not have a longer lifespan than an unplowed grassed swale in a cropfield unless the grassed swale has less capacity to hold runoff water from the design storm frequency. In order to know this, the grassed swale would have to be measured for cross-sectional area and checked against the requirements of a grassed waterway for the drainage area involved. Both waterways can be crowded by a minimalist farm operator and thus both can be destroyed equally well with tillage or an inattentive spray rig operator spraying herbicides across the field. On several occasions, I have seen grassed waterways built to NRCS	James Cropper [jbcropper@yahoo.com]	NRCS Life Span reference was removed from the Guidance and Submission document. It was discussed that originally MDA had decided that Re-verification intervals would be half of the NRCS life span period. The team felt that this was appropriate to determine if the RI practice was still present and functioning. this was also discussed and concurred at AgWG Verification Teleconferences.	APPROVED
8	Submission Doc	7/8/2014	<i>Table 2 NRCS and RI Lifespans</i> - Rotational Grazing is really a management practice so it is annual practice. A clue, that rotational grazing is taking place, is that fences and water troughs are in place is an important one, but the real visual indicator is paddocks with different stages of forage growth on them indicating livestock are in deed being rotated through the paddocks methodically and sequentially.	James Cropper [jbcropper@yahoo.com]	See comment 7 above. Technical comments referred to AgWG.	APPROVED

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9	Submission Doc	7/8/2014	<i>Table 2 NRCS and RI Lifespans</i> -The fact that the RI practice has a longer lifespan than the NRCS practice in this case really shows there is some confusion about a practice's lifespan versus someone choosing to terminate a practice because they no longer want it. Perhaps an RI can be more easily abandoned since there was less effort, money, and time spent on it, but this has nothing to do about its lifespan in durability if it was left to function indefinitely. As shown in this chart, these may be expected lifespans, but they certainly are not based on durability with any precision since no one knows what they might encounter with a homemade job. A homemade waste storage structure might be made of less durable materials, but then again maybe not.	James Cropper [jbcropper@yahoo.com]	See comment 7 above. Technical comments referred to AgWG.	APPROVED
10	Submission Doc	7/8/2014	<i>Stream Access Control with Fencing (PastFence)</i> -"Two issues arise here. One is that of a stream buffer strip that has no guarantee, and in fact, is very unlikely to have a sheet flow of water crossing it from the adjacent land along the entire stream's reach. Vegetative buffers that are placed in upland situations can be placed to be on the contour so that sheet flow from the land above will cross it more or less as sheet flow. This rarely occurs in a stream situation. The general tendency is for long stretches of the immediate bank to be more elevated than the floodplain further away from the stream as out of bank flows drop more sediment out along the immediate vicinity of the bank creating a subtle natural levee. On smaller feeder streams with no floodplain associated with them, a parallel vegetative buffer might more consistently have sheet flow crossing it over broad stretches of the buffer, but not along a floodplain stream."	James Cropper [jbcropper@yahoo.com]	Refer to AgWG since this reference is to the CBP Definition.	REFERRED TO AgWG

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11	Submission Doc	7/8/2014	<p><i>Stream Access Control with Fencing (PastFence)</i> - "A narrow tree corridor along a stream that is fenced off to prevent livestock access to the stream will eventually create shade especially on the north side of an east-west oriented stream, or early morning (west side) and late afternoon shade (east side) on a north-south oriented stream. The pasture side of the fence will become a loitering area within a few feet of the stream for livestock seeking shade on sunny, hot/humid days. This usually results in bare soil areas where heavy milling about occurs and skew more dung and urine deposition to these areas. The same NCSU study showed that these bare soil areas were capable of yielding "Mean concentration of TN from bare ground plots was 93.0 mg N per L, which was 6- to 12-fold greater than the concentration at all other cover levels." This was observed with equal amounts of dung and urine being placed on the bare plots. Imagine if the amount of dung and urine had been increased on the bare plots to take into account actual distribution that would occur in a shaded area."</p> <p>Unintended consequences need to be recognized before making a practice a go-to one in lieu of doing intensive rotational grazing management instead. Especially since a narrow forest buffer is unlikely to do much filtering once the forest becomes so dense that it prevents any ground cover of any consequence to remain and if it is sitting on a</p>	James Cropper [jbcropper@yahoo.com]	Refer to AgWG since this reference is to the CBP Definition.	REFERRED TO AgWG
12	Submission Doc	7/8/2014	<p><i>RI-4b Watercourse Access Control, Narrow- Trees</i>- "A narrow tree corridor along a stream that is fenced off to prevent livestock access to the stream will eventually create shade especially on the north side of an east-west oriented stream, or early morning (west side) and late afternoon shade (east side) on a north-south oriented stream. The pasture side of the fence will become a loitering area within a few feet of the stream for livestock seeking shade on sunny, hot/humid days. This usually results in bare soil areas where heavy milling about occurs and skew more dung and urine deposition to these areas. The same NCSU study showed that these bare soil areas were capable of yielding "Mean concentration of TN from bare ground plots was 93.0 mg N per L, which was 6- to 12-fold greater than the concentration at all other cover levels." This was observed with equal amounts of dung and urine being placed on the bare plots. Imagine if the amount of dung and urine had been increased on the bare plots to take into account actual distribution that would occur in a shaded area."</p>	James Cropper [jbcropper@yahoo.com]	RI4b receives only a Land Use Change credit. Refer technical issues to AgWG.	REFERRED TO AgWG

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13	Submission Doc	7/8/2014	RI-4b Watercourse Access Control, Narrow- Trees "Unintended consequences need to be recognized before making a practice a go-to one in lieu of doing intensive rotational grazing management instead. Especially since a narrow forest buffer is unlikely to do much filtering once the forest becomes so dense that it prevents any ground cover of any consequence to remain and if it is sitting on a natural levee it will not receive any runoff anyway. Perhaps some denitrification would occur in the forest buffer, but the same thing would occur under a pastured grassed buffer since it is the soil drainage situation (saturated soil) that allows denitrification to occur anyway. Meantime, P and sediment attenuation would be miniscule."	James Cropper [jbcropper@yahoo.com]	RI4b receives only a Land Use Change credit. Refer technical issues to AgWG.	REFERRED TO AgWG
14		7/8/2014	RI-6 Watercourse Access Control, Trees- "Same problem here although the shaded bare areas in the pasture would be further away, but not enough to be that significant. Probably will be off the natural levee in a floodplain pasture, but may be in a wetter soil area. However, the runoff water from the bare area will flow downstream along the natural levee until a low point is reached so that the water can decant into the stream at a ditch, gully, or other depression area."	James Cropper [jbcropper@yahoo.com]	Team reviewed comment. No change to VI requested. No changes made.	NO CHANGES MADE
15	Submission Doc	7/8/2014	Prescribed Grazing (PrecRotGrazing) "Degraded in what sense? Does not meet TMDL criteria? From a fishery standpoint or from a water quality standpoint? Loss of native riparian plant species? Care has to be taken in the use of the word, degraded. It is an emotionally charged word. If the streambanks are relatively stable and have perennial vegetation on them, is the stream still degraded? Does the stream have the potential for a fishery that has an economic value? Be more specific as to type of degradation."	James Cropper [jbcropper@yahoo.com]	Refer to AgWG since this reference is to the CBP Definition.	REFERRED TO AgWG
16	Submission Doc	7/8/2014	<i>Prescribed Grazing (PrecRotGrazing)</i> "Vegetative cover needs to be more narrowly defined. There are two types of vegetative cover, canopy and basal area. Canopy cover is easier to measure and the 60% value is very doable for canopy cover. Basal cover of 60% is quite high."	James Cropper [jbcropper@yahoo.com]	Team added the word Canopy Cover to all Tree cover VI's. No change to rotational grazing VI.	APPROVED
17	Submission Doc	7/8/2014	<i>Paper Provided:</i> "Ground Cover Impacts on Sediment and Phosphorus Export from Manured Riparian Pasture-Published online October 27, 2006-David M. Butler, Dorcas H. Franklin,* Noah N. Ranells, Matthew H. Poore, and James T. Green, Jr.	James Cropper [jbcropper@yahoo.com]	Paper provided as requested by team members. Forwarded to AgWG.	REFERRED TO AgWG
18	Submission Doc	7/8/2014	<i>Paper Provided:</i> "Ground Cover Impacts on Nitrogen Export from Manured Riparian Pasture" Published online January 9, 2007;David M. Butler,* Noah N. Ranells, Dorcas H. Franklin, Matthew H. Poore, and James T. Green, Jr.	James Cropper [jbcropper@yahoo.com]	Paper provided as requested by team members. Forwarded to AgWG.	REFERRED TO AgWG

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19	Submission Doc	7/8/2014	Table 4- "N/A usually means Not Applicable. Not defined anywhere in the text that I could find. Should be listed as a footnote to this table. Perhaps it should really be Not Determined (N/D) as of yet. Or, if it achieves variable results or facilitates another downstream practice then say so. N/A makes one wonder why the practice is listed as a BMP." "	James Cropper [jbcropper@yahoo.com]	N/A refers to the type of effectiveness estimate in this table. In other words there is not an effectiveness estimate credit, but is a landuse change credit or, base load change, etc.	REFERRED TO CBP for Options. New table created by Mjohnston and inserted in document.