



Chesapeake Bay Restoration

2018 BMP Verification Assessment

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Water Quality Goal Implementation Team
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2018 Progress Assessment

“Only Verified Practices may be Credited After the Initial Two Year Ramp-up Period. Starting with the 2018 annual progress reporting cycle, those reported practices, treatments or technologies for which documentation of verification has not been provided through each jurisdictions’ NEIEN-based report systems may not be credited for nitrogen, phosphorus or sediment pollutant load reductions for that year.”

****Nutrient Management verification reporting** begins with 2019 Progress submission, per the CBP partnership decision

2018 Verification Assessment

- Deadline for 2018 Progress data, including verification information, was December 3, 2018. This was the first year of verification reporting
- EPA CBPO conducted several runs and analyses of 2018 progress and verification data between December and March 2019
- Extensive communication and collaboration between EPA CBPO and jurisdictions during this timeframe to discuss verification findings
- 2018 progress was finalized at the end of March 2019

2018 Verification Assessment

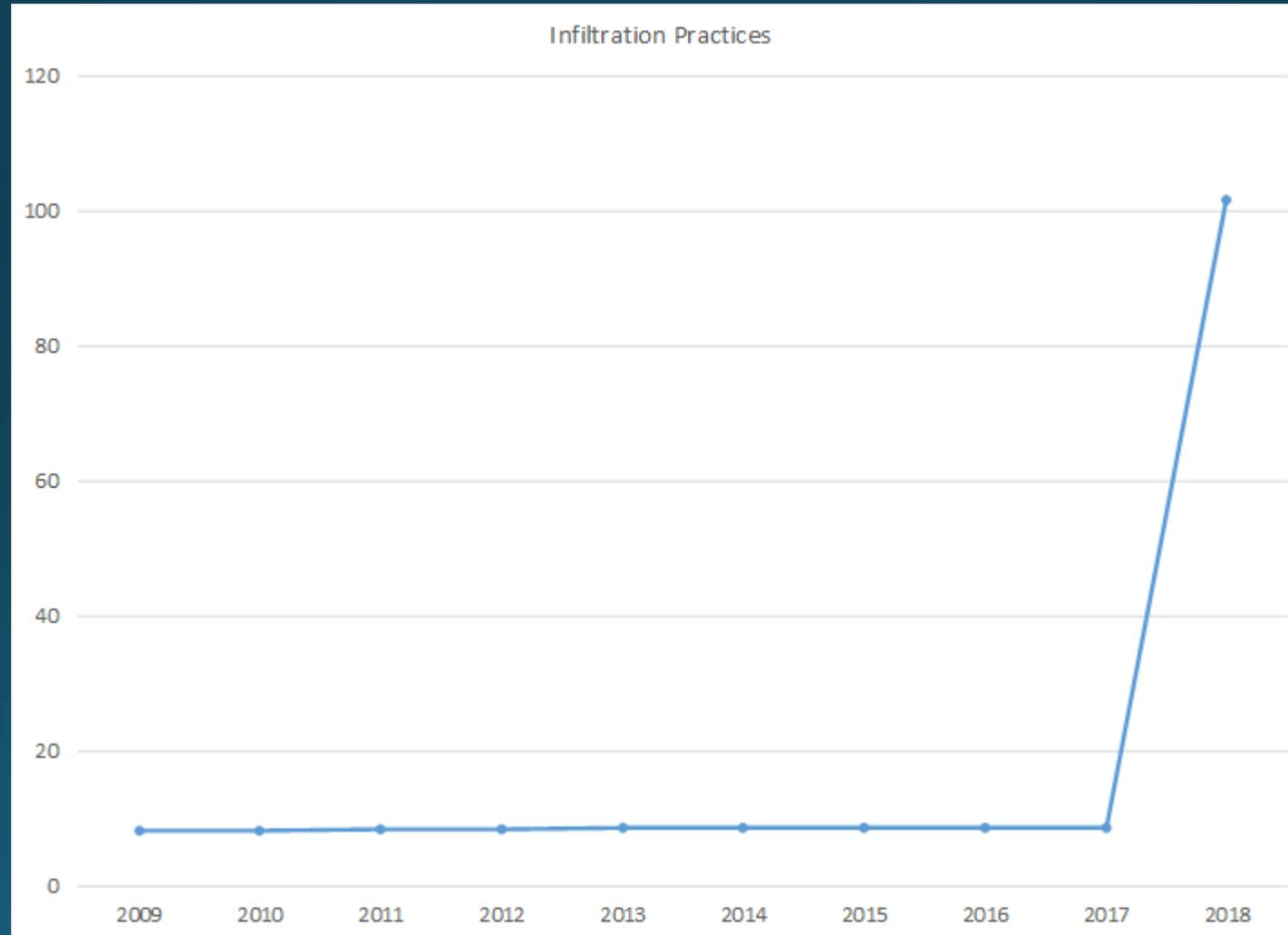
Verification Issues – Newly Reported BMPs

BMPs where there is no reported historic implementation before 2018
Progress

- **CBPO Comment to Jurisdiction:** Please identify the sections and page numbers in your state BMP Verification Program Plan (QAPP) where there's an explanation of the quality of the data for each of the following BMPs (compliance program, visual inspection, etc.) and why each BMP has not been previously reported. For example, does this represent new on-the-ground implementation between 7/1/17 and 6/30/18 – or a new source of data – or both?

2018 Verification Assessment

Verification Issues – Newly Reported BMPs



2018 Verification Assessment

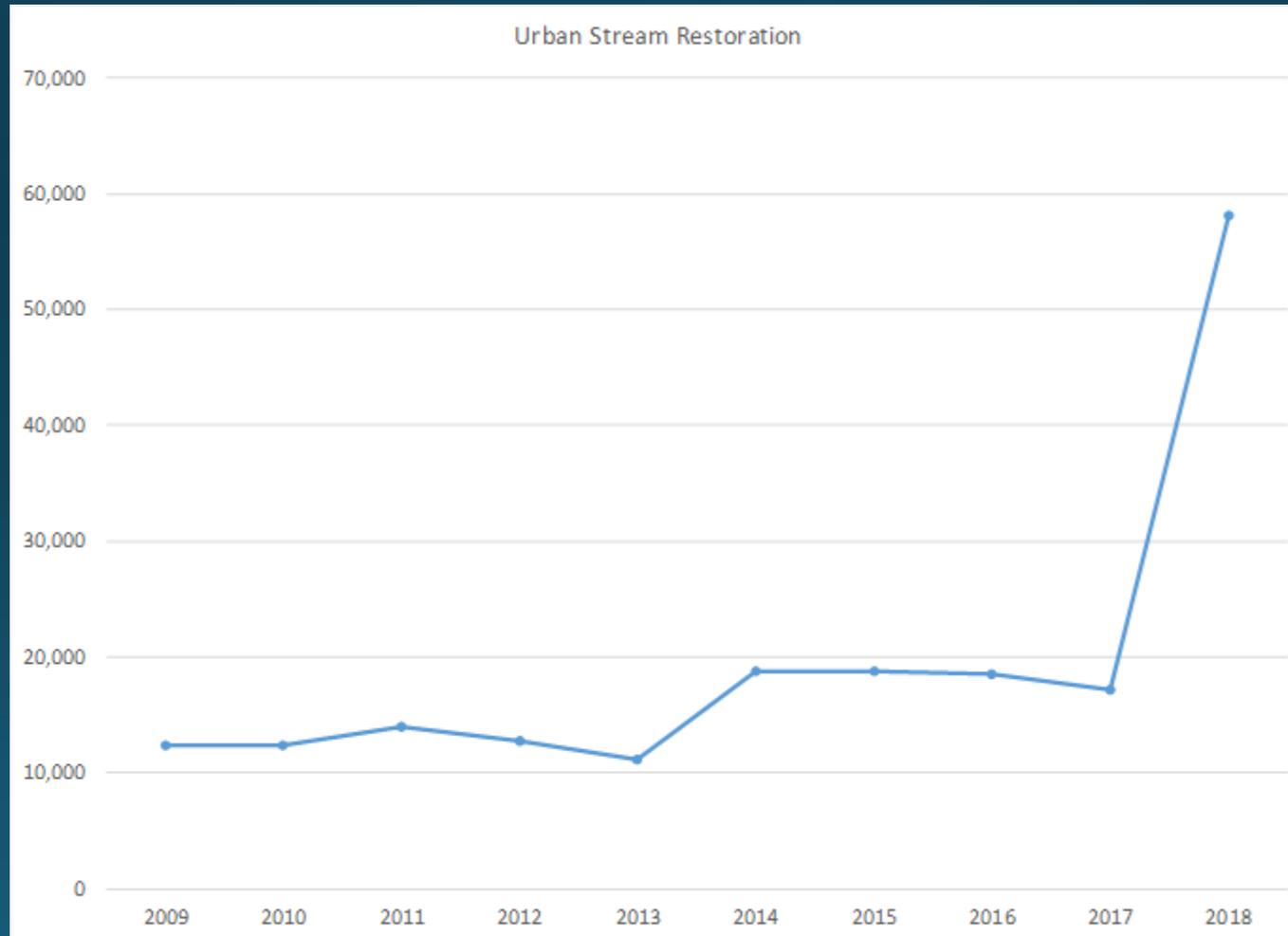
Verification Issues – Potential Over-Reporting

BMPs where the 2017-2018 rate of implementation is more than double the 2009-2017 annual rate

- **CBPO Comment to Jurisdiction:** For each of the BMPs below, please explain the significant increase in the rate of implementation between 7/1/17 and 6/30/18 compared to the longer-term (2009–2017) annualized implementation rate. For example, does the new implementation represent stronger programs and, if so, highlight the program – or a new source of data – or both? See the BMP charts below for each of the highlighted practices.

2018 Verification Assessment

Verification Issues – Potential Over-Reporting



2018 Verification Assessment

Verification Issues – Reported Dates

For the BMP records within the period 7/1/17 – 6/30/18, the following implementation dates and/or inspection dates are repeated a significant number of times.

- **CBPO Comment to Jurisdiction:** Are these accurate implementation and/or inspection dates and, if not, why are dates not being tracked and reported for the associated BMPs? For example:
 - 78% of the [7,630] BMP records over the reporting period are in 4 groups of the same date.
 - Where in the jurisdiction's QAPP is this explained, e.g. what sections and page numbers?

2018 Verification Assessment

Jurisdiction	Verification Assessment
Pennsylvania	Overall, responded adequately to CBPO verification concerns but verification issues remain with some BMPs: Nutrient Application Management Rate Nitrogen, High- and Low-Residue Tillage, Cover Crops + with Fall Nutrients, Soil and Water Conservation Plans, Manure Transport, and Urban Stream Restoration
Maryland	Responded adequately to CBPO verification concerns.
Virginia	Overall, responded adequately to CBPO verification concerns but verification issues remain with some BMPs: Nutrient Application Management Core and Supplements, Street Sweeping, Cover Crops with Fall Nutrients, and Grass Buffers
West Virginia	Responded adequately to CBPO verification concerns.
Delaware	Remaining verification issues with several BMPs, such as Conservation Tillage, High- and Low-Residue Tillage, and Poultry Mortality Composting
District of Columbia	Responded adequately to CBPO verification concerns.
New York	Responded adequately to CBPO verification concerns.

Potential Issues of Concern

- **Credit-life**: BMPs are automatically dropped from the database unless reported as re-inspected and functioning or maintained, which resets the “credit” clock. Most jurisdictions do not have 1619 agreements and point locations of BMPs. This procedure came from the CBP partnership’s direction and approval.
- **Nutrient Application Verification**: Likely contentious as compliance with plans can be difficult to discern. Verification of Nutrient Management was delayed until the 2019 Progress assessment, per the CBP partnership’s direction.

Next Steps

- Jurisdictions are expected to address outstanding verification concerns associated with 2018 Progress by September 30, 2019, in advance of the December 2, 2019 Progress submission
- The CBPO will continue working with those jurisdictions with outstanding verification concerns to ensure all issues associated with 2018 progress are addressed by September 30, 2019, in advance of the December 2, 2019 progress submission.
- In addition, jurisdictions will be expected to submit detailed nutrient management verification data in the 2019 progress submission, per the CBP partnership's direction.

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