

BMP Verification:

Feedback to Agriculture Workgroup on the States' Draft Ag Verification Program Plans

CBP Agriculture Workgroup Meeting
September 17, 2015



Reviews Provided

- BMP Verification Review Panel
 - August 7 from July 30-31 Panel mtg
 - September 4th from Aug 27-28 Panel mtgs w/States
- CBP Workgroup Sector Coordinators
- CBP Quality Assurance Coordinator
- EPA Sector/State WIP Leads

Overall Panel Feedback

- Follow the recommended formats and content (e.g. Table 8 from the Basinwide BMP Verification Framework)
 - Delaware's and West Virginia's draft verification plans provide good examples to follow
- Provide answers to all the questions posed agriculture sections of the Panel's evaluation form
- Anytime a state selects a subsampling percentage—e.g., 5 percent—they should document the process and rationale for how they selected that specific percentage
 - Simply citing a methodology used by NRCS or other data submitting partners is not sufficient
 - Look at NY draft ag verification plan for example to follow

Overall Panel Feedback

- While the Panel recommends the prioritization of BMPs, they note that verification protocols must be developed for all BMPs that a jurisdiction plans to report
- Most states only committed to verifying cost-shared practices—the Panel recommends the jurisdictions consider verifying non-cost shared practices as well, ensuring those investments in pollutant load reduction actions are also recognized and credited by the Partnership into the future

Overall Panel Feedback

- If a BMP has been inspected and found to meet standards, then the state needs to clearly document their plans to ‘restart the clock’ on that practice and apply a new life span
- If a BMP has been inspected and found not to meet standards, then the state needs to clearly document the process for corrective maintenance and the application of a new life span, or alternatively, to remove it from the jurisdiction’s tracking data base

Partnership's Independent Review Panel Feedback on States' Draft BMP Verification Plans – August 2015

	DE	MD	WV	VA	PA	NY	DC
Agriculture							NA
Forestry							
Stream Restoration							
Urban Stormwater							
Wastewater							
Wetlands							

Panel Feedback by State

Delaware: Submitted the best draft plan, well documented, easy to read, understand. Developed plan working with local stakeholders and array of state agencies. Needs to document plans to verify non-cost shared practices.

Maryland: Solid documentation of a proactive agricultural verification program that meets, even exceeds the Partnership's guidance in the basinwide framework.

West Virginia: Well written, yet concise descriptions of current/proposed verification protocols. Not planning ag verification beyond federally cost shared programs and inspections/spot checks by NRCS due to resource constraints. Will pick up verification post contract.

Panel Feedback by State

Virginia: The Panel had a number of questions about what Virginia was proposing particularly for agriculture—moving to a 1% subsampling (compared with MD and NY at 10%). Needed More documentation of underlying statistical sampling design.

Pennsylvania: Panel complimented PA for being upfront on recognized gaps in their draft plan and solid, readable documentation. Concern about reliance on NRCS 5% spot checks. Need schedule for development of verification protocols for other ag conservation practices.

New York: Solid documentation describing a proactive approach to agricultural verification—planning 100 percent on-site inspections for all reported BMP. Addressed Panel's call for underlying documentation, rationale for sub-sampling percentages.

Upcoming Schedule

- **November 15th**: jurisdictions submit their revised BMP verification program plans to EPA
- **December 15th**: EPA approves the jurisdictions' BMP verification program plans or requests specific changes prior to approval
- **2016-2017**: two year 'ramp-up' period
- **2018**: only verified practices will be credited in the future

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Questions

