

## BMP Verification Ad-Hoc Action Team

### Conference Call Meeting Minutes

March 12<sup>th</sup>, 2021

9:00 AM – 11:00 AM

Meeting Materials: [link](#)

### **Summary of Actions & Decisions**

**Action:** Sally Claggett will provide her working document and updated PP for distribution to the workgroup.

**Action:** The BMP Verification Ad-Hoc Action Team is asked to provide feedback on the Wetland Restoration Credit Duration announcement. Please submit all feedback to Vanessa Van Note ([vannote.vanessa@epa.gov](mailto:vannote.vanessa@epa.gov)).

**Action:** A decision will be requested next meeting (April 9th, 2021) regarding Barnyard Runoff Control and Loafing Lot Management credit durations.

**Action:** Elliott, Vanessa, and Jason will discuss possibilities of another survey to determine how fixed people are in their views about credit extensions.

### **Welcome, Introductions, Roll Call, Elliott Kellner, Chair (WVU)**

- Welcome, Roll Call of Participants
- **Next Meeting:** Friday, April 9<sup>th</sup>, 9:00am to 11:00am
- **Announcement:** Introduction of new staffer, Jackie Pickford, *Vanessa Van Note, Coordinator*
- **Announcement:** Update from the FWG on Forest & Tree Planting BMPs, *Sally Claggett, FWG.*

### **Discussion/Questions about FWG Update on Forest & Tree Planting BMPs:**

**Elliott Kellner:** Are all of these plantings on agricultural land, or does it also include urban tree plantings?

**Sally Claggett:** Most of the shape files that Iris processed were on agricultural lands. The stock the tree caliper size will be larger and therefore they should show up sooner in the imagery so she's going to try to get Ahold of some planting dates on some of the larger some of the like individual so this would be individual tree planting in urban areas and it might also cover some urban buffers that where we still need to circle back to the force to work group to see if most because we need to get their feedback to know if most urban buffers are planted using larger caliper trees that's one of the things we're still sorting out. But we think it does make a difference for the individual urban tree planting. For the forest planting that also happens in urban areas, we're also sorting that out with a fresh workgroup because we think that is using mostly seedling stock so they would need the full 15 years to show up in the imagery.

**James Martin:** I have a question about #3 (Slide 6, number 3: "Fence for buffer only needed until trees are ~15 y/o) – I understand that the fence may not be needed from the perspective of the trees being able to sustain say a cow walking through it, but I will say, I have an issue calling it a buffer if cows or other livestock have access. Because by that logic then silvopasture

would be considered a forest even though its understory is full of grazing animals. I think there needs to be a distinction because any time livestock has access, it is no longer a buffer it is pasture.

**Sally Claggett:** That's a good point. We still need to work on that. Is silvopasture even a practice yet? I know it's an NRCS practice in some states. I would argue that the buffer is still the buffer, we still have it showing up as trees, it's just the extra input of manure and not knowing how many cows are utilizing the area. It's very dependent on the cows and the land use.

**Vanessa Van Note:** that is our definition as well. For the stream exclusion fencing BMP is to prevent livestock from accessing the stream so that's a big part of having the fence there.

**Mark Dubin:** Yeah, I want to reiterate that yes, in order to maintain a BMP it has to be 100% exclusion from cattle all the time. So, even if we're removing that it doesn't make a difference if it has trees, it's still not a BMP at that point.

**Sally Claggett:** So with fencing, practice life is 30 years that is what you all have determined (with no maintenance required).

**Mark Dubin:** There is not really a difference between a pastured buffer and a non-pastured buffer. Might be worth looking into the differences.

**Sally Claggett:** With fence is pasture, without fence is crop. The whole fencing requirement is something the Forestry WG did not address. We were looking more at the trees and the buffers.

**KC Filippino:** is there an option for lidar imagery and what happens when imagery isn't available? Is any of this in terms of imagery detection been documented other than iris's research? Can we have some documentation of what the imagery can and cannot capture? I think it's really important to get this documented.

**Sally Claggett:** I think it will come up in the backout decision and the Urban Tree Canopy Expert panel – the 97 sq ft that is being observed through other high-res imagery that's when you pick up the tree cover as land use. We've got it documented in the paper but we need to better document this work of Iris, it's ongoing at the moment.

**James Martin:** This effort is an assessment of forest cover when the real question that we will face from a backout perspective is when the automated imagery analysis that University of Vermont and the Conservancy are doing will detect a parcel as forest. Will it detect it at 20% forest cover, 80% forest cover or somewhere in between? This is good work but not sure if it answers our question.

**Sally Claggett:** It's my understanding that Iris did take both those data points from the Chesapeake Conservancy to do her analysis, so it is using the same data that the Chesapeake Conservancy has come up with. And I believe its land use at that point, not land cover.

**Norm Goulet:** I still think this analysis shows credit duration of 15 years is still way too long. It takes roughly 14 years based on your analysis before we can even see that as imagery, so we need a shorter period. Don't have an issue with the lifespan, just an issue with the credit duration. It needs to be shorter because we can't even see it before 14 years.

**Sally Claggett:** Thank you Norm, we agree. We want to make sure these practices are well established. This is the slide for credit duration. There is a lot going on in that first 15 years, it's the first five years it's just getting established and there are multiple visits in the first five years as indicated in our verification guidance and they need to be established and have some mid-contract management going on. From NRCS, all these buffer practices need to comply with the maintenance and the definition so they're going to be within that 15 years and a lot of

things are going to happen to ensure all these buffer practices are complying with the standards and specs which is why we're sticking with the 15-year timeline. And the data that we got from Maryland, Pennsylvania, Virginia, the majority are 15-year contracts. We don't see many 10-year contracts, if any, and if they were out there, they would still have to be implemented according to the practice definition.

**Norm Goulet:** Does that also hold true for the forest planting not just the forest buffer?

**Sally Claggett:** We're still looking into that.

**Jill Whitcomb:** The reason as to why urban forest buffers would remain at 10 years is due to the lack of knowledge on essentially contracts and requirement for them to be in place for 10 years?

**Sally Claggett:** That's one that we're still trying to figure out what size caliper trees are planted there and are they more or less protected, how long can we expect them to last. We haven't settled on 10 year yet. Not usually done with contracts so we still need more data for urban forest buffers.

**Jill Whitcomb:** Do you have knowledge of state regulatory requirements for forest buffer protection and restoration in developed plans?

**Sally Claggett:** I don't have that offhand.

**Jill Whitcomb:** I think it would be worth looking into so we're not short-sighting ourselves on the urban front because they don't have the same type of contractual obligations as they do in the ag side for the most part.

**Sally Claggett:** That's a really good idea and also your thought about the ms4 programs because I know that they do speak to specs, but I just don't know how much data, there is, as far as what is the magnitude of the practice that goes in using, for instance, MS4's. But I will look into it.

**Jill Whitcomb:** It's a permit requirement to ensure buffers are either protected or mitigated in some other way or place. I can look into that further.

**Norm Goulet:** I think it's important to remember ms4 lands count for less than 50% of urban stormwater.

**Alana Hartman (in chat):** I'm not aware of any regulations in West Virginia's portion of the bay watershed that would provide assurance that buffers are protected are growing.

**Matt English:** What's the estimated number of visits to a buffer in the 15 year period?

**Sally Claggett:** Pre-planting visit, post planting visit, multiple in the first five years and then at least one visit after that. Required that a certain % of the new buffers get visited. Can someone post the guidance in the chat?

**Matt English:** Yeah I just remember that a very low percentage were revisited, I think it was like 5%?

**Sally Claggett:** The newer programs put more responsibility on the steward (who is doing the planting) rather than the landowner, whereas in the past it was mostly a contract between the landowner.

**Chad Wentz:** The 5% spot checks are the engineering and ecological spot checks to see how were doing with implementation and specifications. I think what you're talking about here is CREP. There is a little bit more follow up with a CREP contract. With the new agreement, status review 2 to 3 mark, status review mid contract to address any invasives, etc., and then a status review at least 1 year prior to the expiration but not more than 2 years at the end of the contract. To possibly help the client if they want to re-enroll. Also, the silvopasture

discussion—for Virginia that doesn't meet the land use forest requirement for us because we require a pasture condition score, there has to be enough grazing opportunity in a silvopasture type setting that it's going to meet the prescribed grazing even with trees.

[Loretta Collins](#): Can you post the Forestry paper that holds all of this information?

[Sally Claggett](#): Yes I will make sure that Jackie has it.

**Action:** Sally Claggett will provide her working document and updated PP for distribution to the workgroup.

- **Announcement:** Back-out and Cut-off due to Land Use update from WTWG, *Jeff Sweeney, WTWG Coordinator*

[Jeff Sweeney](#): This is a brief description of a procedure called a backout -- used for BMPs that involve land use changes and when they go from a high loading land use to a lower loading land use, that's how you get the credit in the model and in the real world. The land use change is method of credit in the model and applies from the time the BMP is reported as implemented until we receive new land cover or ag census data (typically every 5 years). At that time, when you get the new data, the calculated credit in the simulations replaced with these acres from the imagery or the ag census, so it's assumed that the new data sets set the conversion and the credit is now burned into these background conditions. And if we were to also credit the calculations of moving the land from high loading to low loading then we would be double counting the credit for those BMPs. There is a proposal to adjust this backout a bit for the BMPs that involve tree plantings.

So, if you plant trees a year before we get this new land cover imagery, that's incorporated into the model, that imagery would certainly not detect those saplings. It would take 10 to 15 years for them to be detected so we shouldn't be cutting off that land use change calculation from high loading to low loading. The proposal is to extend that credit for the calculated land use change until the trees would be picked up by the imagery. We don't know whether that is 10 or 15 years based on the Forestry WG recommendation. Last week's meeting we went over back out procedure and an issue was brought up about how we address the established rule in the model that all BMPs get full credit when they're implemented. So, for example, when you plant those saplings they get full credit when they're put in the model, as if they're a mature 15 year old standard tree. And that is the point of the model—to give credit for the management action, not necessarily to get the conditions exactly right when they occur on the ground. The goal is to have practices in place by 2025-- in 2025 you plant those saplings, in 2024 they would get credit and count towards that goal in 2025. So that was brought up and VA is going to come back to us on the first Thursday of April and explain to Watershed Technical why you can kind of separate these concepts of giving immediate credit to tree plantings and still do this extension of the land use credit that's calculated in the model.

At that point we'll have some more discussion. I don't know if we'll quite be there for a decision on what we're going to do. If the membership feels comfortable with whatever is proposed at the end of next month, we could do a vote on it. If not, I feel that it would probably be May when we would move something forward.

#### **Discussion/Questions about WTWG Update on Back-out and Cut-off:**

**Jill Whitcomb:** Is there going to be any discussion or consideration on the use of the net change of one land use land cover data set to the next one to identify the net change in an area covered by trees when the credit duration expires so we can see in reality what the change is? Is that part of the backout discussion?

**Jeff Sweeney:** No, we're separating the credit duration and the backout procedure. The credit duration part is done first through the tracking tool and the backout is done in CAST after the credit duration.

**Jill Whitcomb:** I'm asking for a discussion about showing through any reporting frameworks that the net change of the landscape plus those that are capture as BMP acres.

**Jeff Sweeney:** No land cover imagery can't decipher that was planted or whether it was there naturally, for buffers anyway. You can detect the change of the canopy or the density of trees but the imagery can't tell you whether it was the management action done for those trees or not.

**James Martin:** We just don't have shape files for every forest planting practices. We just have the county that the forest planting happened in. The challenge is we're making the assumption that all the practices were captured in the imagery.

**James Martin:** One follow up question Jeff, are you also going to look into practices where backout is applied like herbaceous land conversions or septic connections or impervious surface reductions?

**Jeff Sweeney:** No one has proposed anything like that, right now it is just focused on tree planting BMPs.

- **Announcement:** Wetland Restoration, *Vanessa Van Note, Coordinator*
  - Vanessa gave a quick update on the information she has found for the wetland restoration credit duration (to extend past 15 years). Due to lack of time, she was not able to go as in-depth as she originally planned, so instead she will send out the announcement to the distribution list and post it on the calendar page.

**Vanessa Van Note:** I am going to send out the announcement in a PDF because we are running very late right now, but basically I was just going to talk about how there WRE contracts for wetlands. This was requested by jurisdiction that we take a second look at the 15-year credit duration on wetlands currently. Wetlands are across all states in the watershed and they do treat a lot of acres of land in our watershed, so it's an important practice for the jurisdictions. The contracts are a 30-year easement. Wetlands can technically, once established from the wetland framework document, be stated that they could remain in perpetuity or indefinitely. I spoke with Tim and Chad from NRCS and they mentioned that PA and VA are primarily 30-year contracts.

**Action:** The BMP Verification Ad-Hoc Action Team is asked to provide feedback on the Wetland Restoration Credit Duration announcement. Please submit all feedback to Vanessa Van Note ([vannote.vanessa@epa.gov](mailto:vannote.vanessa@epa.gov)).

### **Continued Discussion on Barnyard Runoff Control and Loafing Lot Management**

*Vanessa Van Note, Coordinator, and Elliott Kellner, Chair*

- The state data provided thus far from MD, PA, and NY was presented.
- Reviewed the results of the survey (anonymously) and addressed the rationale behind the “yes” and “no” submissions.
- Trails and Walkways documentation was presented.
- Inspection dates from the most recent progress run & the impact of credit durations on implementation was discussed.

### **Comments/Questions/Discussion about BRC and LLM Presentation:**

**Jill Whitcomb:** Is there supposed to be some level of scientific data to support staying with where we are now or is the onus on those that are providing the information to extend the credit duration to show data to support that justification?

**ElliottKellner:** The onus of convincing the party would be the ones advocating for change as opposed to the status quo, keeping it the same.

**Jill Whitcomb:** If NRCS decided to reduce or increase contract lifespan, are we then going to come back and reduce or increase credit durations based solely on NRCS contract lifespans.

**ElliottKellner:** Does anyone in the group want to speak to that?

**Bill Tharpe:** I have a question about credit duration. I know credit duration does not equal lifespan, but how does credit duration play into the period of time that states create their verification schedules in comparison to the credit duration, cutoff backouts, basically the time that the reduction leaves the calculation for the bay model?

**James Martin:** Each jurisdiction took their own approach to their verification plans but in all cases those plans were guided by the credit durations. We have limited resources with which to do inspections, but the general approach is to make sure you’re doing those inspections just in time to extend the credit in the model. When any of these practices go beyond their duration, if there isn’t an inspection that is documented and recorded, then the credit is put to zero. So, the credit durations are a big factor, but again different jurisdictions took different approaches. Some used a statistical sample based approach (aka they will inspect a sample of all the practices in each year and then use the failure rate identified as the basis for eliminating partial reporting of those practices within the universe of the sample group inspected).

**Bill Tharpe:** So, if a BMP is verified prior to the credit duration, let’s say a 10-year credit duration, and is inspected and meets standard by 9 and 7 months, then no time is lost on the books?

**James Martin:** Yes, that’s correct, assuming it passes the inspection.

**Bill Tharpe:** Got it. Then I think a proactive plan to inspection is the way to go, not giving a longer credit duration.

**Jill Whitcomb:** From a PA point of view, especially as it pertains to the Ag verification program, we utilize our existing inspection programs to take a look at many of these structural practices. Many times, it comes down to staffing and their time-- how much time can we spend on the inspection part instead of implementing new practices? From our perspective, we look at the practices that have been documented since before the rollout of our ag inspection program, as part of the planning process. We wanted to provide that level of data and detail for the group to consider, as it shows that while NRCS contract lifespan may be 10 years or five years, etc. that does not equate to the effective function of those practices and it's important to make that distinction. Because one of my concerns is that what if NRCS reduces the lifespan because of staffing considerations? I think we need to balance both verification and implementation at the level needed to meet our collective goals.

**Jeremy Hanson:** Unrelated – can we compile the rationale in a document instead of a PowerPoint? I think they are really valuable.

**Vanessa Van Note:** Yes, I'll have it in a document and a much simpler format. We will have it available to you at least 10 days before our decision.

**Jeremy Hanson:** I think a report of some kind would also be beneficial to have all of this compiled to show once we have gone through all of these practices.

**Vanessa Van Note:** Sure, thanks for the recommendation.

**James Martin:** I want to make sure that folks understand that a vast majority of ag land is privately held. The process of making a verification inspection requires obtaining permission to access the property. During the contractual period, NRCS has the permission (along with the states), but once you're out of the period, trying to regain access to properties to inspect them has proven difficult. In VA we have more implementation reported and lost due to credit duration than we have gaining credit in the model currently. That -- especially when we have data that suggests that many of those practices are continuing to function -- is due to us putting garbage into our model. Because we're telling our model that because we don't have access to the property, we're giving ourselves zero credit for implementation that we know happened. And based on those we have access to there is evidence that these practices are continuing to function. Verification is to make sure the model has the best information possible, not to put garbage into our model. Consensus on this topic is nowhere to be had according to the survey. I say we sunset this group. It's a waste of time.

**Loretta Collins:** I think it could go both ways though. My understanding is the whole verification protocols came about because of the public at large that was worried about reasonable assurance.

**Jill Whitcomb:** There's a very large difference between 15 years and in perpetuity. We're seeking to utilize the information that we have on hand to show how we should really be spending our time and not continuing to chase after practices that have documentation across almost all jurisdictions that show these practices are functioning as designed. We should be spending our time efficiently and effectively.

**Bill Tharpe:** I believe MD's data is based on the amount of verification that we've already performed. I understand there is a need to continue implementation, but if you're unable to



visit what you've already implemented in the past, that's not a BMP issue that's a relationship issue. I still stand behind the fact that verification is giving the data a backbone.

**James Martin:** I'll add that the verification framework envisioned us revisiting these issues. The whole purpose was to set something conservative so that we could gather data to inform the process. That's been attempted but more time and data is needed in my opinion.

**Elliott Kellner:** My hope is to generate a proposed chain of approval. We are at this second bubble here. We need to decide as a group how we want to move on this topic before we recommend anything. We are requesting a decision on the extension of the credit durations for these two practices in our next meeting (April). We would like a decision and an official vote which we will conduct all together to determine whether or not we're going to move forward. And as a reminder, we are bound by the consensus based approval method of the Bay Program so if we are short of consensus, we will not be moving forward with generating a recommendation to extend them, and instead, we will need to then move on to our next BMP which is grass buffers.

**Action:** A decision will be requested next meeting (April 9th, 2021) regarding Barnyard Runoff Control and Loafing Lot Management credit durations. The BMP Verification Ad-Hoc Team will be asked to vote on an official recommendation.

**James Martin:** I wonder if we should take a survey of the group and just ask "would any evidence convince you to extend a credit duration for any practice?" I suspect you will not find consensus.

**Vanessa Van Note:** To your earlier point, James, I'm concerned about how much data is enough data and the time and resources we are putting into this. We do really need to know what those chances are of these practices being extended in light of new information because I do have the concern as well moving on to grass buffers and wetlands and running into similar issues. I did my best to show this in a statistically valid way, but obviously I don't have the raw data, but I tried to show what actual chunk of the total reported acres in the watershed these verified and inspected practices make up of it. We need to think about: In order to make these changes, what exact data is needed, and how much data is enough data?

**Dana York:** Before this we didn't have verification and we've been presented data by MD and by PA. I think we have some data here which we've never had before, and I think that's a positive.

**Brittany Sturgis:** Will consensus continuum be used for the decision?

**Elliott Kellner:** Yes, consensus continuum will be used.

**Loretta Collins:** Thank you for doing the survey, it's good to know where everyone stands.

**Jill Whitcomb:** Between now and the next meeting when we have to vote, in order to address those on the fence, is there an opportunity to have a better idea of what it would take for those entities to go either direction so none of us are really surprised when the time comes?

**Rebecca Hanmer (in chat):** I think it could be helpful for voting in the April meeting if the states proposing the credit extensions are asked to reply to any issues raised by the "no" voters in the survey.



**Elliott Kellner:** I think that's a great idea, Rebecca. So let's make time for that, either a discussion or a brief Q&A segment before the official vote. Jill, to address your concern, I hesitate to release the identities of the "No" voters but I do want to make sure people can influence the votes if possible. We can look into if there's a possibility of doing something to assess how fixed people are in their opinions. Vanessa, Jason and I can talk about maybe doing another survey to assess how firm everyone's stance is and we can let you know over the next month.

**Jill Whitcomb:** I think that would be helpful. Just to go back to James's point earlier, I want to make sure there's even an opportunity to make our case or if we are more or less just spinning our wheels.

**Elliott Kellner:** Sure, I hear you. Maybe we can follow up on that with some additional smaller meetings and figure out the best way to approach this as a team.

**Action:** Elliott, Vanessa, and Jason will discuss possibilities of another survey to determine how fixed people are in their views about credit extensions.

**Introduction to Grass Buffers,** *Vanessa Van Note (EPA), Coordinator, and Elliott Kellner (WVU), Chair*

In the absence of time, the "Grass Buffers Credit Duration Discussion" PPT was not presented. The presentation is posted on the Calendar page for participants to view on their own time. It includes arguments for and against the extension of credit duration. The goal of this presentation is to introduce information on grass buffers, along with the arguments for and against extending the credit duration of grass buffers.

**Meeting adjourns,** *Elliott Kellner (WVU), Chair*

- Meeting Recap—Jackie Pickford (staffer); Meeting Actions & Decisions

**Meeting participants:**

Loretta Collins, UMD/CBPO

Adrienne Kotula, CBC

Matt English, DOEE

Brittany Sturgis, DNREC

Dana York, GEC

Jennifer Star, Alliance for the Bay

Bill Tharpe, MDA

Jason Keppler, MDA

Cassandra Davis, NYSDEC

Jill Whitcomb, PA DEP

Kate Bresaw, PA DEP

Lisa Beatty, PA DEP

Ted Tesler, PA DEP

Norm Goulet, NOVA

James Martin, VA DEQ  
Jeff Sweeney, EPA/ CBPO  
Alana Hartman, WV DEP  
Vanessa Van Note, EPA/CBPO  
Elliott Kellner, WVU  
Chad Wentz, NRCS  
Sally Claggett, USFS  
Rebecca Hanmer, FWG  
KC Filippino, HRPDC  
Mark Dubin, UMD  
Ruth Cassily, UMD  
Elizabeth Hoffman, MDA  
Clint Gill, Delaware Dept. of Ag.  
Jennifer Walls, DNREC  
Jackie Pickford, CRC

### **Chat Log**

From Brittany Sturgis to Everyone: 08:59 AM

hi all, I'm trying a new headset and may have problems with my microphone. if you can't hear me for roll call, I'm present.

From Alana Hartman to Everyone: 09:04 AM

No microphone this morning - Alana Hartman, WVDEP is here.

From Clint Gill to Everyone: 09:05 AM

Clint Gill, Delaware Dept. of Ag.

From Jen Walls - DNREC to Everyone: 09:05 AM

Jennifer Walls, DNREC

From Jason D Keppler -MDA- to Everyone: 09:06 AM

Jason Keppler, MDA

From Elizabeth Hoffman, MDA to Everyone: 09:10 AM

Elizabeth Hoffman, MDA

From Rebecca Hanmer to Everyone: 09:10 AM

Rebecca Hanmer, FWG, is here

From Ruth T. Cassily to Everyone: 09:29 AM

I thought the purpose of the fence was to keep the livestock from the stream, not to protect the trees, are you saying the fence doesn't need to be reverified?

From Loretta Mae Collins to Everyone: 09:41 AM

Will Sally's updated presentation go on the calendar page for this meeting?

From Me to Everyone: 09:42 AM

Yes I'll make sure it's updated

From Alana Hartman to Everyone: 09:47 AM

I'm not aware of any regulations in WV's portion of the Bay watershed that would provide assurance that buffers are protected/growing.

From Jill Whitcomb - DEP Chesapeake Bay Office to Everyone: 09:50 AM

Section 102.14 Riparian Buffer Requirements

<http://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/025/chapter102/s102.14.html&d=>

From Matt English (DC) to Everyone: 10:38 AM

Isn't using a statistical sub-sample a way to make verification more efficient?

From Jason D Keppler -MDA- to Everyone: 10:46 AM

Matt, short answer yes, jurisdictions are able to use a statistical approach as an alternative:

<https://www.chesapeakebay.net/documents/Appendix%20B%20-Ag%20BMP%20Verification%20Guidance%20Final.pdf>

From James Martin to Everyone: 10:49 AM

Unfortunately the model framework that deals with credit duration does not easily accommodate statistically based approaches

From Dana York to Everyone: 10:52 AM

I Have to leave to start another meeting. Ill read the notes from meeting.

From Jason D Keppler -MDA- to Everyone: 10:54 AM

Thanks Dana!

James, perhaps we could seek guidance to help jurisdictions report statistically-based verification?

From James Martin to Everyone: 10:57 AM

Yes. Been there. The solution is to report every practice twice, once with the % pass fraction and one with the % fail fraction. Since the pass/fail changes annually based on the latest data (or rolling 3-yr avg) each practice through time would need to be reported twice and re-reported every year

From Jason D Keppler -MDA- to Everyone: 10:58 AM

Sorry all, I have to run as well. James, lets catch up offline to chat in greater detail

From Matt English (DC) to Everyone: 10:59 AM

If we are not ready to consider extending the credit life for these BMPs, do we feel the data supports offering partial credit for BMPs after their currently listed credit life?

From Rebecca Hanmer to Everyone: 11:03 AM

I think it could be helpful for voting in the April meeting if the states proposing the credit extensions are asked to reply to any issues raised by the "no" voters in the survey.

From James Martin to Everyone: 11:06 AM

It is not going to change minds. Why bother