

## **Attachment G**

### **Urban BMP Reporting, Tracking and Verification: Scoping Issues**

BMP verification is emerging as a key issue in the Bay TMDL to provide reasonable assurances that the states/District will achieve the expected nutrient and sediment load reductions from reported controls/practices. More specifically, what are the procedures for reporting, tracking, and verifying that BMPs (regulatory and voluntary) are properly designed, installed, and maintained over the lifespan of the practice according to agreed-upon practice standards?

As part of its work plan with CBP, CSN is responsible for looking at these procedures for the urban and suburban sector, and is looking for some initial scoping feedback from the USWG on the current issues they are experiencing in BMP reporting, tracking and verification. Some of the key questions include:

- ***What are the current strengths, weaknesses and bottlenecks in reporting BMPs from the local level to the state level?***
- ***What are the primary issues the states are encountering when aggregating BMP implementation from dozens/hundreds of local governments?***
- ***How can the administrative burden of local BMP reporting be streamlined without compromising data quality?***
- ***Most structural BMPs are assumed to have a permanent removal credit—should the duration of the credit be shortened, and renewed based on performance assessed during maintenance inspection***
- ***Maintenance inspections are a critical verification tool and most Bay states requires locals to perform periodic maintenance inspections. How can these existing programs be refined to meet the BMP verification needs under the Bay TMDL***