

September 4th, 2019

For WQGIT review:

Request to convene BMP Verification group and address some additional issues of concern
Draft Letter to Dana Aunkst, Chair CBP Management Board

The WQGIT discussed verification issues at their meeting on July 8, 2019. The group recommends the BMP Verification Subcommittee, or another group that includes representation from the Jurisdictions, EPA and the Chesapeake Bay Commission at a minimum, convene to discuss and make recommendations to the WQGIT regarding the implementation of verification. The WQGIT recommends that this be a standing group, able to address these topics as well as any additional topics that may arise during their discussions or that may arise from future updates to the modeling system.

A number of specific topics were identified by the WQGIT, they are described below:

- Consider alternatives and make recommendations on the timing and format of annual updates to jurisdictions' verification program plans.
- Consider alternatives and make recommendations on the process and timing for review, approval and publication of the annual updates to jurisdictions' verification program plans and QAPPs to ensure the equitable and consistent application of verification standards between states. Nutrient Management Plans can serve as a case study in considering this issue.
- While the original jurisdiction verification program plans were reviewed in great detail, by verification experts prior to approval, recent reviews of annual updates seem to go beyond the original approved protocols. Consider alternatives and make recommendations on procedures for approving any additional data collection and verification expectations that are beyond that which was included in jurisdictions' approved verification program plans. Conservation Tillage can serve as a case study in considering this issue.
- The verification actions to remove BMPs at the end of their credit duration are not currently included in CAST reports. This presents a transparency problem for local implementation partners that are very interested in seeing that the BMPs they report are getting credit in the models. These reports should be re-evaluated in light of verification to ensure our BMP reporting systems are as accurate and transparent as possible. Consider alternatives and make recommendations on reporting actions to remove reported BMPs for verification reasons in CAST reports.
- Make recommendations on alternatives to the current all-or-nothing approach to BMP re-verification. The partnership should explore the potential for partial credit, or variable credit through time rather than losing 100% credit for practices outside of their credit duration. Animal Waste Management Systems can serve as a case study in considering this issue.
- The partnership should re-assess the scientific/logical basis for the established credit durations and update them as appropriate. The forestry workgroup has requested revisiting credit durations on some practices. Similarly, the responsibility for establishing the credit duration for newly established BMPs is not currently assigned.

Consider alternatives and make recommendations on procedures for updating or establishing BMP credit durations.

- BMPs reported as installed in accordance with verification plans, can be eliminated from the modeling for reasons other than verification, such as back-out or cut-off. These procedures have not been documented with the same level of transparency as verification, nor have the processes been re-evaluated in light of verification or the high resolution land cover data acquisition plan, and this is needed. Consider alternatives and make recommendations on back-out and cut-off procedures, documenting those processes and ensuring they are consistent with the processes for updating land cover and transparent in CAST data reporting.
- Consider alternatives and make recommendations for determining and including an estimate of the costs of verification for each BMP in CAST.

Finally, there are two additional issues of concern that came up during the WQGIT conversation:

- The first has to do with the process and methods used by CBPO to evaluate annual progress data submissions. The analysis that was done for 2018 did not accurately reflect the details of the data and resulted in faulty conclusions that reflected poorly on reporting jurisdictions. The WQGIT requests that moving forward, the analysis methods be developed in coordination with and approved by the partnership. It would be helpful for the resulting progress reviews to include a factsheet to help interpret the findings along with the reasoning supporting any resulting conclusions. Suggestions for how to improve the quality of the data and resolve any identified concerns should also be included. The goal is to move the process from the current “gotcha” mindset to a collaborative partnership effort to improve the integrity of our modeling data and processes. This may be most appropriately considered in the Watershed Technical Workgroup.
- The second issue goes beyond the Verification Subcommittee or workgroup and beyond the role of the WQGIT. Ensuring jurisdictions have full access to all federally cost-shared conservation practice data and enhancing reporting of federally cost shared practices were among the twelve Verification Framework elements approved by the partnership. However, very little progress has been made in these areas. The WQGIT asks that the Management Board take the lead in advancing these lagging verification elements.

Without some progress on these critical issues, the Partnership’s verification efforts, and our overarching water quality goals are vulnerable to failure.