Barnyard Runoff Control; CBP Credit Duration = 10 years

Arguments to Extend from 10 years to **15 years

Comments in RED and Blue were added during February's meeting.

Argument For	Argument Against
1. 558 Roof Runoff Structure, a closely related NRCS practice, has a NRCS Practice Lifespan of 15 years. States often report gutters (NRCS lifespan 15 years), which are Roof Runoff Structures.	1. Credit durations were established to be conservative/considerate of the minimum lifespan of related NRCS practices. There is a desire to be conservative with the amount of time we allow practices to go without inspection. Other reported practices can be less than 15 years, such as Diversion (10 years). Outside of the 10-year window, there is a greater potential these practices are not being maintained as expected or operations have changed. Animal Trails and Walkways is being reported more than other related BRC practices. Where was this decision made? **Action:** Vanessa Van Note is looking into documentation of this decision.
2. CBP AWMS has a credit duration of 15 years. BRC is a supporting practice. – It is simpler to verify all related/supporting practices at the same time since they can be installed together to support each other. PA is in favor of 15 years to verify the entire system as a whole.	2. The CBP AWMS was established based on **NRCS 313 (Waste Storage Facility) or NRCS 359 (Waste Treatment Lagoon)** that have 15-year practice lifespans.
3. The practice lifespan of related NRCS practices define a **minimum amount of time** (years) a practice is expected to be fully functional if proper O&M is performed. The system is designed to outlast the minimum practice lifespan (if maintained properly).	3. A maximum amount of time that a LLM practice will last (assuming proper maintenance) is *undefined*. Without proper maintenance, the practice is not designed to last the minimum amount of time defined by the practice lifespan.
5. Landowners contribute financially to NRCS funded projects = incentive to maintain and retain practice.	5. Animal numbers (an example of a resource concern) can be far in excess what the practice is designed to manage.

These projects address a specific resource concern.	We are unaware of how fast these operations are going.
6. Infrastructure is in place and can exceed minimum lifespan.	6. Infrastructure potentially undermined by new ownership. Ex. Amish Farmers in Lancaster Co. Often do not mechanized equipment. Can be simpler to allow runoff to run. (Potentially 8-10 of farms inspected in a county like Lancaster.) We do not know which time window new ownership occurs in on average [10-15 or 15-20 years?].
7. PA is found an average life of 19 years for all barnyard runoff control related practices. Some practices are at 20-30 years. Gutters have been replaced that are 50 years old; and even then, the wood beneath the gutter had rotted, not the gutter itself.	7. The purpose of credit durations was not to verify design life, they were to address how long we can reasonably assume a practice would remain on the landscape. Credit durations provide an accountability framework to practices that are no longer under programmatic oversight from state or NRCS funded programs. Verification increases the frequency of inspection. We are trying to answer the question of how often should we be out there on the ground inspecting.
8. Trails and Walkways may include fencing (20 years), gutters (15 years) that have been designed to last longer. Trails and Walkways were seen to have an average age of 16 years in PA.	8. • Trails and Walkways practice address erosion control (supporting practice to other practices like HUAP and prescribed grazing), not nutrient control. • There is not an armoured base. The primary purpose is to prevent sediment from moving, yet it is receiving a nutrient reduction credit as equivalent to BRC. • We have lumped many practices into one to have them all behave the same way. Are we able to separate these practices? Can it be more similar to LLM? • Could potentially be a simple change through the WTWG; but may change the history. Would we need a new benefit

	analysis/reduction efficiency? Is there new information available to inform efficiency values? Could we start with replicating the current efficiency value that is Partnership approved? **Action:** Vanessa Van Note is looking into these questions. • The pasture expert panel could not come up with an independent efficiency, but included in the efficiency of prescribed grazing? [This practice maps to BRC, not prescribed grazing.] • Expert Panel Outcome – Could not provide a satisfactory answer due to variations. This is a sediment reduction practice. It was included into the primary practice, prescribed grazing as a supporting practice. The prescribed grazing practice is an annual one. • Currently, the trails and walkways BMP is being mapped to a feeding space loading source, which is not an entirely accurate way to depict the loading rate of this BMP.

Loafing Lot Management, CBP Credit Duration = 10 years

Argument to extend from 10 years to 15 years.

Comments in RED and Blue were added during February's meeting.

Argument For	Argument Against
1. CBP AWMS has a credit duration of 15 years. LLM is a supporting practice. It is simpler to verify all related/supporting practices at the same time since they can be installed together to support each other. PA is in support of verifying an AWMS in its entirety.	1. The CBP AWMS was established based on **NRCS 313 (Waste Storage Facility) or NRCS 359 (Waste Treatment Lagoon)** that have 15-year practice lifespans. The practices most closely related to **LLM: HUAP, Access Roads, and Trails and Walkways**; have NRCS practice lifespans of 10 years. Outside of the 10-year window, there is a greater potential these practices are not being maintained as expected or operations have changed.
2. The practice lifespan of related NRCS practices define a minimum amount of time (years) a practice is expected to be fully functional if proper O&M is performed.	2. A maximum amount of time that a LLM practice will last (assuming proper maintenance) is *undefined*. . Without **proper maintenance**, the practice is not designed to last the minimum amount of time defined by the practice lifespan.

3. Landowners contribute financially to NRCS funded projects = incentive to maintain and retain practice.	3. **Funds provided address a specific resource concern**. Animal numbers (an example of a resource concern) can be far in excess what the practice is designed to manage. We are unaware of how fast these operations are going.
4. Infrastructure is in place and can exceed minimum lifespan.	4. Infrastructure potentially undermined by new ownership. Ex. Amish Farmers in Lancaster Co. Often do not mechanized equipment. Can be simpler to allow runoff to run. (Potentially 8-10 of farms inspected in a county like Lancaster.) We do not know which time window new ownership occurs in on average [10-15 or 15-20 years?].
5. 261, of a total 663, (or 39% of) Access Roads and HUAP practices were inspected by PA. All were functioning. On average, these practices were over 8 years past their credit duration (18 years old).	5. The purpose of credit durations was not to verify design life, they were to address how long we can reasonably assume a practice would remain on the landscape. Credit durations provide an accountability framework to practices that are no longer under programmatic oversight from state or NRCS funded programs.
6. • The states (MD and PA) have provided additional data that could be used to establish longer credit durations. • The goal of verification is to have the best data possible in the model. We have evidence from inspection that these practices are lasting longer.	6. • The primary practices looked at during the time these credit durations were established was the HUAP structure (561). 561 is typically a feeding areas and regulations would like these structures moved as far upslope as possible from streams and provide some level of nutrient and sediment reduction to the downslope area. Vegetated areas can be placed downslope to mitigate the runoff.

• MD and PA data is compelling. We did not have this kind of data 6 years ago. • Balance is needed. We cannot base everything on the weakest link. We should use the data from the state verification programs.	• Discussion was held in the AgWG in 2015. State and NRCS programs were looked at to determine the credit durations. Looked at the oversight that these programs provide. It was questionable whether or not these practices would continue to be maintained outside of the oversight. • The verification program and credit durations were established to reconcile the trust issues with the previous model. Once a practice was reported, it stayed in the model indefinitely. Constraints were set up 6 years ago. Is this data enough? • The purpose of credit durations was not to verify design life, they were to address how long we can reasonably assume a practice would remain on the landscape.
7. Caution looking at NRCS practice lifespan for one specific practice. All HUAPs Tim Peters have been involved in (assisted in designing) have also involved fencing. HUAPs won't function unless animals can be confined on the HUAP, and fence has an NRCS practice lifespan of 20 years. NRCS certainly wouldn't think the HUAP would fail before fencing.	7. Credit durations were established on contract durations of NRCS and state programs. The purpose of verification is to introduce an increased frequency of inspections. Does the rate of verification/inspection impact the frequency of maintenance?
8. Verified 71% of HUAP practices in NY, 100% have passed the inspection. Practices data back to 1988. NY's Verification program is setup in such a way that we will inspect all practices before their Credit Duration Lifespan is expiring. Even if that means more verification visits than it typically would through our selection process. We use our selection process as well as run reports for any practices that may be "ending in the next 12 months" to make sure that we are visiting them and inspecting them before their "lifespan" runs out.	8. The purpose of credit durations was not to verify design life, they were to address how long we can reasonably assume a practice would remain on the landscape. Credit durations provide an accountability framework to practices that are no longer under programmatic oversight from state or NRCS funded programs.

9. Cost-share helps keep cost low and Farmers want to keep off repairs as long as they can; but they maintain for animal health and ease of access within the farm. Farmers have practical reasons for maintaining practices.	9. Verification was introduced to balance trust in operations/farmers and the design integrity of structures.