Points to Consider for the Recommendation on Partial Credit

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How did we get here?

Summary of Options/Proposals Covered up until this point:

1. **The BMPVAHAT recommends eliminating credit durations for reported cumulative BMPs such that the BMPs will continue provide nutrient and/or sediment reductions in the model until the reporting agency indicates the BMP is no longer functioning.**
    - Eliminating Credit Durations entirely has not been supported by the partnership. Credit Durations were established by the Source Sector Guidance and Verification Framework. The Bay Partnership has not overturned this decision. Discussion of credit durations led to the formation of the BMPVAHAT.

2. **The BMPVAHAT recommends extending the credit duration for all reported cumulative BMPs for X amount of years.**
    - Extending the credit durations for all reported cumulative BMPs was not supported by the Partnership, which led to prioritizing which BMPs to revisit (forestry practices, LLM, BRC, wetland practices, grass buffers).

3. **The BMPVAHAT recommends extending the credit duration for select cumulative BMPs based on examination of existing verification data sets:**
    - LLM – consensus not reached for 15 yrs; remains at 10 yrs
    - BRC- consensus not reached for 15 yrs; remains at 10 yrs
    - Forestry Practices (Forest Buffers, Tree Planting) – Consensus reached for 15 yrs
    - Wetland Practices (Wetland Restoration, Wetland Creation) – Recommendation produced by WWG, still in progress.
    - Grass Buffers – sufficient data was not provided to pursue extending the credit durations, the AgWG may need to discuss grass buffers in an EP type format in the future for multiple questions surrounding the BMP

4. **Which leads us here: The BMPVAHAT recommends approval of the proposed methodology for partial credit for federally funded cumulative agricultural BMPs that have exceeded their assigned credit duration.** This proposed methodology serves as a compromise that acknowledges the current challenges to verification facing some partners, allows more time for creative solutions to those challenges, and maintains the integrity of the verification protocol approved by the CBP partnership. The use of this methodology is expected to sunset when the CBP Phase 7 suite of modeling tools is implemented.

Discussion with WQGIT Leadership

- If partial credit is approved by the BMPVAHAT, it may be carried forward to the management board by the WQGIT.
- If partial credit is approved by the BMPVAHAT, this does not guarantee that partial credit will be included as a priority for CAST-23.
    - The WQGIT, along with the management board/Bay managers and the modelling workgroup, will need to determine the priorities for CAST-23, which may conflict with partial credit being included into CAST-23.
    - The programming team only has a set number of hours to address CAST-23 priorities. This will be taken into consideration when developing a workplan.
- If partial credit is approved by the BMPVAHAT and determined to be a priority for the Bay Partnership, the programming team will begin the development process, which may involve trial and error.
- If partial credit is successfully developed, a state may opt in or opt out of it (by identifying the BMP as a BMP fully funded by federal funds and implemented by USDA NRCS).
- States will need assistance from the Bay Partnership in communicating any changes to modeled results due to the application of Partial Credit.

Takeaways from the AgWG Survey

- **Conflicting views on the sunset period.**
- **This is a compromise, but not a solution to missing location data associated with USDA-funded practices.** We do not have any other solutions at the moment.
  - The verification of USDA funded practices should not be the states responsibility.
  - We need to ensure that we are not underreporting conservation across states.
- Crediting in the model and verification program procedures **should not be manipulated as a solution to the data-sharing issue.**
- The lifespan of these practices is variable. **Applying a set value for partial credit across these practices does not make sense.** This method is complex and has no scientific validity.
  - A conservation practice's effectiveness falls within a range of 100 to zero. The performance of BMPs over time cannot be assumed to be 100%.
- **It is better to remain conservative rather than overestimate the benefits of practices on the landscape.**