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# NRCS Ag BMP Crediting:

## Crediting NRCS Soil & Water Conservation Plan Practices

### NEIEN Appendix Proposal- POST WTWG

Agriculture Workgroup

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# Key Concerns raised by the WTWG

- *The CBP S&W Conservation Plan BMP is defined by a combination of practices.*
- *If the S&W Conservation Plan is equivalent to an individual practice, would the definition from the Simpson and Weammert report need to change?*
- *The SWCP efficiencies in the Simpson and Weammert report were evaluated as a combination of practices.*
- *What efficiencies would be assigned to the individual practices if the WTWG were to approve the proposal to reverse the Phase 6 NEIEN Appendix decision?*
- *Reporting both SWCP AND individual practices would lead to more cutoff in the model, meaning practices would not be credited because there is not enough land available in the model.*
- *If the May 2022 proposal is approved, states would need to choose whether to report SWCP OR individual practices.*
- *Keeping the June 2015 decision means a guidance needs to be developed for how to crosswalk (the units of) each practice to the CBP SWCP BMP. Example: Feet of hedgerow planting to acres of S&W Conservation Plan.*





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# History of actions to-date

The AgWG approved a motion to advance the topic to the WTWG. This does not mean that the topic has been partnership approved.

## **The NEIEN topic is contingent upon approval of the WTWG**

*Was a formal consensus vote in the AgWG, but to be passed and implemented, it is contingent upon the approval of the WTWG)*

**August 2022-** Topic was presented at the WTWG - several concerns were raised which they would like to address prior to this issue being voted on in the WTWG

**September AgWG Meeting :** *Final approval of changes in the NEIEN appendix was requested at the August WTWG meeting, however the WTWG expressed concerns related to the crediting of the individual practices. Leon Tillman, USDA-NRCS, and Vanessa Van Note, WTWG Coordinator, summarized WTWG main concerns (above)- and outlined three options for moving forward for AgWG consideration.*



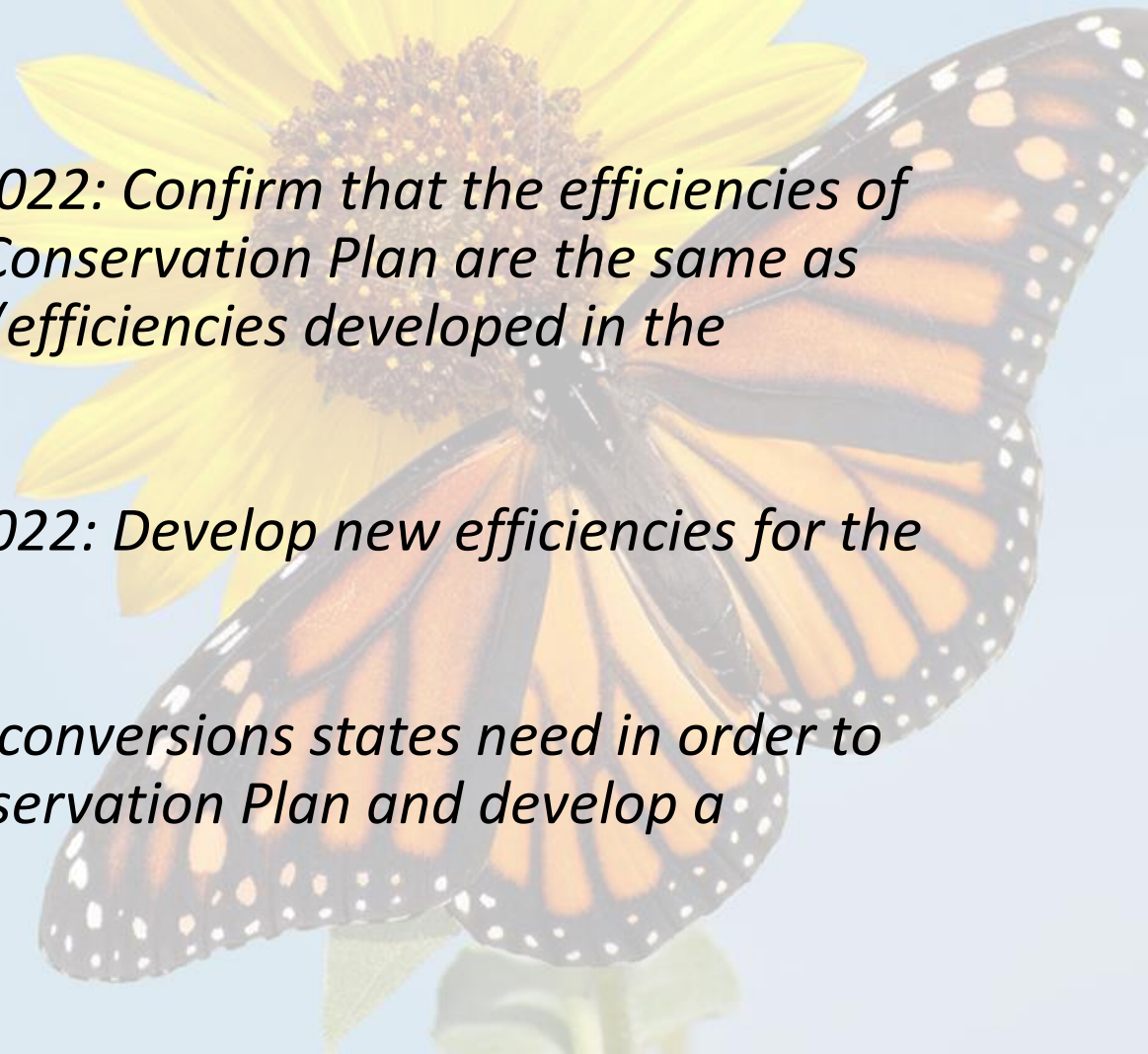
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# Options following the WTWG Meeting

## Suggested Options to Move Forward

- 1. Move forward with the Proposal from May 2022: Confirm that the efficiencies of the individual practices under the CBP S&W Conservation Plan are the same as the efficiency for a combination of practices (efficiencies developed in the Simpson and Weammert Report).*
- 2. Move forward with the Proposal from May 2022: Develop new efficiencies for the individual practices under the S&W*
- 3. Keep the June 2015 Decision: Inform the unit conversions states need in order to report individual practices as the CBP S&W Conservation Plan and develop a guidance for reporting these practices.*







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**Option One:** *Move forward with the Proposal from May 2022: Confirm that the efficiencies of the individual practices under the CBP S&W Conservation Plan are the same as the efficiency for a combination of practices (efficiencies developed in the Simpson and Weimert Report).*

***Does not seem like a valid option to the WTWG as stated because:***

- An individual practice isn't going to accomplish what a combination of practices accomplishes- the efficiencies would not be equivalent
- the SWCP efficiencies were evaluated for a conservation plan composite or combination of practices.
- We would need to determine efficiencies for each of these individual draft status practices
- The AgWG would need to endorse an expert panel with a reasoning
- Prior to endorsing devoting CBP resources to an expert panel-states should decide whether they want to report these practices individually or under the existing SWCP- they need to choose on order to avoid duplication and excess/cutoff issues (see next slide)



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**Option Two:** *Move forward with the Proposal from May 2022:  
Develop new efficiencies for the individual practices under the  
S&W*

- This option assumes the AgWG will endorse an expert panel to develop individual efficiency values for each draft status BMP
- This reintroduces the original issue of double counting and cut-off that prompted the change from reporting individual practices to reporting the SWCP:
  - the probability of overlapping BMPs increases as the implementation level of each BMP increases- only the state or reporting entity knows if they are reporting BMPs implemented on the same acre
  - Reporting both a S&WCP and individual bmp components of a plan for the same acreage would be double counting- potential for more cutoff - a state would need to decide to report one way or the other





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**Option Three:** *Keep the June 2015 Decision: Inform the unit conversions states need in order to report individual practices under the CBP S&W Conservation Plan and develop guidance for reporting these practices.*

**Background:**

- NRCS does not have a SWCP BMP, they track individual BMPs/components of the SWCP (draft status BMPs)
- Several states only track individual practices- rely on NRCS data, not plans
- This means NRCS/states are not getting credit for those individual BMPs in the model
- The NEIEN appendix does have/allow conversions for various units to acres, any missing values needed could be generated

Assumption: providing conversion tables from various practice units to acres would allow states that do track individual draft practices to add the acreage involved under each practice and report the total under the SWCP BMP to receive credit

**This option:**

- Avoids the issue of double counting practices (when a state reports both SWCP's and individual BMPs)
- Avoids the issue of increased excess/cut-off when states report mutually exclusive BMP's from the same acre



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**Option Three:** *Keep the June 2015 Decision: Inform the unit conversions states need in order to report individual practices under the CBP S&W Conservation Plan and develop guidance for reporting these practices.*

**Potential Issues with this option identified by WTWG:**

- Adding individual BMP acres and reporting them as a plan excludes all the conditions where the BMPs are in a treatment train (are multiplicative or apply to the same acre of land)
- Assumes all the BMP components of a SWCP are additive- this is not the case, to correctly account for the effect of multiplicative BMPs- we would need a separate efficiency value for each, presumably this would require an Expert Panel.
- Could ignore the real-life condition of treatment trains and just sum the acres for each BMP

**Alternative that might allow us to avoid the necessity for an expert panel:**

- Compare both composite and individual practices in the reported dataset to see if we can determine a relationship between the sum of the individual BMP acres and SWCP acres





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## Alternative Options for Consideration

1. If states want to report Soil and Water Conservation Plan practices individually as mutually exclusive additive acres, the AgWG will need to endorse an expert panel to identify the component efficiencies of multiplicative (treatment train) BMPs
2. States can continue to report Soil and Water Conservation Plans as a composite BMP that excludes multiplicative (treatment train) BMPs
3. AgWG work to establish an additional BMP category to account for multiple, similar practices similar, but different than SWCP
4. Rescind proposal and re-structure it to make this easier. This could be a recommendation evaluated and considered by the Federal Crediting Task Force



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# QUESTIONS

