



Ag BMP Verification Guidance Review Comments and Responses

**Comments Provided by a
Subgroup of the CBP BMP
Verification Review Panel
((9/17/2014)).**

Ag BMP Verification Guidance Review

Comments and Responses

- Q: Will application of the Agriculture Workgroup's 'default' guidance, if followed by the states, result in improvements to their verification programs?
- R: The term "default" was utilized to define the baseline minimum that all states would adhere to and actually presents a higher subsampling requirement than what is currently required by NRCS.
- Those states that wish to present an alternative MUST provide statistically sound and clear justification, and receive approval to implement.

- Q: Did the Agriculture Workgroup's guidance move away from an independent review as recommended by the Panel?

- R: The AG WG did not move away from an independent review, but did identify the Q of 'who' exists on the landscape that can actually conduct the reviews
- The AgWG requested a review of the definition of "independent" by the BMP Verification Committee.

- Q: Should not the amount of follow-up sub-sampling be set based on a default high level of statistical confidence rather than a negotiated percentage of BMPs assessed?

- R: From the Tetra Tech "statistics 101" explanation of the binomial analysis, it's clear that in some cases, the subsampling may increase or decrease the percentage.
- The level of confidence can be established based on the knowledge of the practice, the level of confidence in its permanence, and the understanding of the practice implications on the landscape respect to management, adaptive management, and presence over time.

- Q: Doesn't the Agriculture Workgroup's guidance provide the states the choice to ignore the default recommendations and develop their own statistical verification procedures?

- R: States recognize that the default procedures are required unless they can provide an alternative that is statistically sound and justified.
- This is based on the understanding that the default had to be established at a level that provided high enough confidence across the board for all practices but could not take in to account practice-specific or landscape level considerations on implementation.

- Q: The BMP Verification Review Panel is not equipped to review the specific methodology and rationale for individual jurisdiction's follow-up sub-sampling procedures.

- R: EPA has committed resources to ensure the Panel will have access to available technical assistance to appropriately evaluate alternative sub-sampling procedures.
- It is a function that will be needed to support the guidance AG WG has provided.

- Q: Part of the Agriculture Workgroup's BMP verification guidance seems unnecessary or difficult to follow.

- R: The AgWG has received input that the revised guidance developed (8/2014) provides the states what is needed for them to develop their verification plans.
- The guidance was approved by consensus decision of the workgroup.

- Q: Is there a better way to measure the impacts and benefits of agricultural practices?

- R: The verification guidance was intended to address practices that are being reported; that they still exist, are still functioning, and are being maintained according to design standards.
- The impacts and benefits of agricultural practices is a monitoring and modeling question – as it would be for all sectors.