Attachment A

CBP Verification Committee's
Revised Draft BMP Verification Principles

Revised: April 30, 2012

PRINCIPLE 1: Practices, treatments, and technologies reported for credit through the Chesapeake Bay Program partnership must be:
- properly designed, installed, and maintained to ensure that they are achieving the expected nutrient and sediment reductions reviewed and approved to by the partnership;
- consistent with or functionally equivalent to established practice definitions and/or standards;
- not previously reported; and
- not expired or removed from the landscape.

In support of tracking, verifying and reporting practices not consistent with nor functionally equivalent to established practice definitions and/or standards, partners and stakeholders can seek partnership review and approval of BMPs and corresponding efficiencies, supported by documentation/data, which are less than functional equivalents of the previous partnership approved BMPs working through the established partnership BMP review protocol.

PRINCIPLE 2: Verification of practices needs to provide assurance of effective implementation by being scientifically rigorous and defensible in this era of TMDL accountability, based on professionally established and accepted sampling, inspection, and certification protocols regardless of funding source (cost share versus non-cost share), source sector (agriculture, urban, etc.), and jurisdiction (state, local) while allowing for adaptability.

PRINCIPLE 3: Need to establish a representative baseline of practice implementation from which periodic confirmations will be performed to account for changes through time.

Additional principles requiring further consideration/review
by the BMP Verification Committee

Two Options for Principle 4 Not Fully Discussed by Committee

PRINCIPLE 4: Need to strive for the right balance between the requirement for verification and the need to focus limited staff and funding on continued program implementation.

OR

PRINCIPLE 4: Need to recognize and address the need for sufficient staff and funding in order to accomplish both verification and continued program implementation.

Two Principles Not Fully Address During April 30 Conference Call Due to Time Constraints

Principle 8: Use the verification process to encourage, even challenge land owners, municipalities, and implementing organizations to elevate their level of performance of practices, treatments, and technologies rather than attempt to define pollutant reduction efficiencies for less than functionally equivalent practices.

Feedback:
- Really like the last verification principle, particularly if it's tied to agricultural certainty.
- This principle raises red flags for us.

Committee Discussion from April 30th Conference Call:
- Confusing as written—recommend not including as a principle.
- Use of the word "challenge" could be seen as inflammatory.
- We could address some of what the principle is driving at, but with more clearly articulated and without the inflammatory language, within the preamble or background text within our BMP verification document.

Options:
- A) Accept the draft principle as written.
- B) Edit the principle to address concerns expressed.
- C) Reframe the entire principle.
- D) Remove this principle as it does not meet the criteria for being a principle.

Principle 9: Working to verify that practices are properly designed, installed, and maintained over time is a critical and integral component of transparent, cost efficient, and effective program implementation and ensuring the public of achievement of the expected nutrient and sediment load reductions over time.

Feedback:
- Need to include a principle describing how we can use verification to make better use of our existing resources in supporting local decision making, target better, make more efficient use of our resources.

Committee Discussion from April 30ᵗʰ Conference Call:
- No feedback documented as the Committee did not have time to discuss this draft principle.

Options:
- A) Accept the new draft principle as written.
- B) Edit the principle to better address the recommendation for an additional principle.
- C) Reframe the entire principle.
- D) Remove this principle as it does not meet the criteria for being a principle.

Addressing Overarching Concerns Raised by Committee Members Not Fully Addressed During April 30ᵗʰ Conference Call

1) There does not seem to be a pervasive commitment to transparency and public accountability; this needs to be deliberately and consciously incorporated.

2) ~~Need more time to work through each of the principles with the Steering Committee.~~

3) Want feedback from the various source sector workgroups to ensure these draft principles support/ don't conflict with their work on the verification protocols.