

**Chesapeake Bay Program Water Quality Goal Implementation Team's
BMP Verification Committee
January 22, 2013 Conference Call**

ATTACHMENT E

Documentation of the Jurisdictions' BMP Verification Programs

Background

At the start of the process for developing a basinwide BMP verification framework, the partners agreed to reach consensus on the level of documentation expected from the jurisdictions at some point in the development process. That time has now come!

The outline below, subject to further modification, review, and concurrence by the Committee, describes expectations for the type and level of documentation needed from all the jurisdictions without getting too prescriptive. The recommended documentation elements draw directly from the principles, protocols, and procedures being developed, reviewed and adopted by the Chesapeake Bay Program Partnership.

Assumptions

- The Committee has already recommended any jurisdictional BMP verification program documentation build directly upon their existing quality assurance program plans (QA plans) already drafted, approved by EPA, and in place supporting their Chesapeake Bay Implementation Grant.
- The seven jurisdictions' existing QA plans are principally focused on documentation of their extensive BMP tracking and reporting programs and procedures for submitting the collected data to EPA through their state's national environmental information exchange network (NEIEN) node.
- Additional documentation, not already contained within the existing QA plan, will focus on describing existing or commitments to carry out expanded or new BMP verification efforts across all appropriate source sector and habitats.

Recommended Supplementary QA Plan Documentation

By the major source sectors and habitats targeted for restoration:

- Provide copies of or references to the BMP verification protocols and procedures adopted by the CBP Partnership.
- Describe and fully document any state specific modifications to/variations from the CBP Partnership adopted protocols and procedures.
- Document any jurisdictional decisions to focus verification efforts on a subset of practices, treatment or technologies.
- Document how the respective source sector/habitat BMP verification protocol(s) will be implemented by whom, how, and through what programs/mechanisms.

- Document what/which verification protocols/procedures are already in place, fully operational, and routinely carried out.
- Document what/which verification protocols/procedures are planned for future implementation, by when, by whom, how and through what programs/mechanisms.
- Describe what further programmatic changes are necessary to be carried out by whom in order to make the verification protocols/procedures fully operational and routinely carried out.
- Document the agency, departmental, and organizational responsibilities for carrying out the verification protocols/procedures cross walked with existing or planned regulatory programs, cost share programs, and programs providing technical services.

Address assurance for the jurisdiction's full access to federal cost share practices by:

- Providing as an appendix or providing URL links to the existing 1619 data sharing agreements with USDA's FSA and NRCS.
- Documenting procedures in place for handling the federal cost share practice data in adherence to the agreement(s).

Address elimination of double counting by:

- Providing documentation on the jurisdiction specific procedures either being carried out or which will be carried out to eliminate double (or more) counting of a single reported practice receiving funds from two or more sources which, in turn, are independently tracking and reporting the same practice.

Address historical data clean up:

- Based on the procedures developed and recommended by the Watershed Technical Workgroup and adopted by the CBP Partnership, provide documentation on how the jurisdiction plans to carry out the clean up their historical BMP implementation data based and over what time period.

Recommended Panel Presentation Documentation

For the jurisdictions' presentation of their recommended BMP verification programs to the Partnership's BMP Verification Review Panel, each jurisdiction should walk through each of the five BMP principles adopted by the Partnership and describe how their cumulative set of BMP tracking, verification, and reporting protocols and procedures upholds each of the principles.

Recommended Next Steps

- Written feedback from Committee members
- CBPO staff revised the documentation outline and send out to Committee members in advance of the February 21 Committee meeting
- Committee members review, make further changes, reach consensus, and approve a final set of jurisdictional documentation recommendations