Chesapeake Bay Program Water Quality Goal Implementation Team
BMP Verification Committee's March 13, 2013 Meeting

Attachment F

Watershed Technical Workgroup Requests for
Guidance on Historical Data Clean-up

Background

At the BMP Verification Committee's February 21, 2013 meeting, the Watershed Technical Workgroup posed a series of questions, seeking guidance on how to proceed forward with the historical data clean-up. As part of their request, the Workgroup put forth the following recommendations in their briefing presentation to the Committee:

- The focus of verification should be on new BMPs, not on historic BMPs.

- There should be a different level of verification scrutiny for the historic BMPs as it may be difficult if not impossible to provide the same level of verification detail for many historic BMPs as will soon be required for future implementation.

- Jurisdictions need more information before they can finalize their plans to refine historic data, so final plans are not expected following the March Watershed Technical Workgroup meeting.

- The historic BMP cleanup work plans should be referred to as "lines of effort." Jurisdictions would prefer to follow their own lines of effort, rather than potentially face penalties that might be incurred if a described task in a work plan is altered by a jurisdiction.

- The Chesapeake Bay Program Partnership should propose alternative cleanup options that might be conducted by Chesapeake Bay Program Office staff if any jurisdictions opt to not devote their resources to historical BMP data clean up.

Workgroup's Questions and Options Developed by CBPO Staff

Question: What will be the level of verification information required for historic data? Is statistical interpolation enough, or will verification of practices be required?

Options:
1) Verification of practices would NOT be required from 1985 to present. Practices implemented during this time period would be estimated using the following methods:
    o Analysis of best available data
    o Record of previous NEIEN historic data submissions

o Statistical estimation of implementation levels for each year using current implementation and best available records as reference points

2) Verification of practices WOULD be required from 1985 through present. Practices would be verified using the following methods:
o Spot checks of inspection and maintenance records from two or more points in time to estimate implementation levels across the state or county
o Spot checks of implementation levels from two or more points in time using aerial photography to estimate implementation levels across the state or county
o Other actions described in the source sector workgroup protocols

3) Verification of practices would NOT be required from 1985 through 2000, but WOULD be required from 2000 through present. Practices implemented from 1985 through 2000 would be estimated using the methods from option 1. Practices from 2000 through present would require more rigorous data for verification purposes. Practices would be verified using the following methods:
o Spot checks of inspection and maintenance records from two or more points in time to estimate implementation levels across the state or county
o Spot checks of implementation levels from two or more points in time using aerial photography to estimate implementation levels across the state or county
o Other actions described in the source sector workgroup protocols

4) The BMP record would NOT be built into the calibration period, so no verification of historic BMPs would be required.

Question: Will there be different levels of scrutiny for different sectors? E.g., will estimated data for some urban stormwater BMPs be acceptable while verified inspection records be required for some agricultural BMPs?

Options:
1) Chesapeake Bay Program would make every effort to ensure that data from all sectors is judged using equitable rules specified in the options from question 1.

2) States would follow protocols being developed by source sector workgroups, and the Watershed Technical Workgroup would look across verification protocols to ensure equity amongst the sectors.

3) States would be asked to submit a description of their historic BMP verification methods to the Verification Committee for review, and the Verification Committee would look across descriptions to ensure equity amongst the sectors.

Question: How much effort should be placed upon each previous 10-year period? Should jurisdictions prioritize efforts from 2000 through 2010, leaving 1985 through 2000 to be interpolated?

See options for first question.

Option for Data Base Clean-Up by CBPO Staff

As requested by the Watershed Technical Workgroup, here's the approach Chesapeake Bay Program Office (CBPO) staff could take in cleaning up historical BMP data records if any individual jurisdictions made the decision not to undertake this work themselves.

1) CBPO would likely begin with the reported cumulative record of BMPs and look at the reported history for when each BMP was first reported – as the end points.

2) There would also be a consideration of the reported history at intervals of, perhaps, five years as was done in some jurisdictions for the BMP conversion from WSM Phase 4.3 to Phase 5.

3) There would be an accounting of design or plan life of each practice where relevant, dropping off expired practices if the jurisdiction did not already take life span into account.

4) To minimize "cut-off", there would likely be a maximum implementation level for each BMP in the historic record and BMPs would be distributed across larger spatial scales and broader land use categories than, perhaps, originally reported.

5) There would be assurances of progressively increasing BMP levels through time for all relevant BMP at scales down to, perhaps, counties.

6) NRCS and FSA data would be accommodated directly or used as reference points. CBPO staff would also consider other sources of agricultural BMP data such as CEAP (Conservation Effects Assessment Project) and use data directly or as reference points depending on the BMP.

7) Jurisdictional staff would be consulted directly by CBPO staff to make best professional judgment calls, if and when needed.

8) Ultimately, each jurisdiction would "sign-off" on the historic BMP record and take responsibility for the data.

Requested Actions by the Verification Committee

ACTION: Select the preferred options in response to the Watershed Technical Workgroup's questions seeking guidance on how to proceed with planning for the historical data cleanup's by the jurisdictions.

ACTION: Reach agreement on the option for historical BMP data clean-up by Chesapeake Bay Program Office staff.