Jurisdictional Verification Protocol Design Table Supporting Narrative

Panel/Committee Members: The Jurisdictional Verification Protocol Design Table is provided for use by the jurisdictions as guidance, supplementary to the "Chesapeake Bay Program Best Management Practice verification Program Design Matrix" and the "State Protocol Components Checklist" already provided in the draft basinwide framework report. The Design Table provides an example format a jurisdiction could choose for organizing the documentation of their verification protocol choices for their preferred groupings of BMPs covered by common verification protocols. Regardless of the exact format a jurisdiction chooses to use to document their BMP verification protocols, by following what is presented in the Design Table, the jurisdictions can work stepwise through the recommended verification documentation for their appropriate grouping of BMPs. Please review and comment from this perspective.

Sector Workgroups: The BMP Verification Review Panel asks that you confirm that your Sector Verification Guidance provide the jurisdictions with specific recommendations addressing:

- *WIP Priority*: Clear guidance for determining those practices would are providing such a low level of nutrient and sediment pollutant load reductions to the overall WIP implementation that they warrant a different level of verification.

- *BMP Type*: Recommendations for the logical groupings of BMPs which can be, in turn, verified using common protocols.

- *Initial Inspection*: Provide specific recommendations addressing applicable inspection methods by your workgroup's recommended groupings of BMPs, the recommended frequency of those initial inspection(s), recommendations for the qualifications of the inspection personnel, and recommendations for what data/information should be recorded during the initial inspection.

- *Follow-up Checks*: Provide recommendations on the applicable suite of methods for conducting follow-up checks.

- *Lifespan/Sunset Provisions*: Provide any sector-specific recommendations for addressing practice lifespan and sunsetting practices which have not been follow-up checked at the end of their approved lifespan.

Please use the Design Table to walk through your current 'close to final' Sector Verification Guidance and check off that your guidance provides clear recommendations for how the jurisdictions could address all the elements included in the table.

The Panel encourages your workgroup to either structure you overall guidance document to reflect the headings/subheadings within the Design Table or at least provide a similar table summarizing your recommendations as a table within or as an appendix to your verification guidance document. Please make it easy for our jurisdictional partners to follow your guidance and recommendations for each of the logical groupings of BMPs.

WIP Priority
As described within the draft basinwide verification framework report, jurisdictions can choose to vary to the level of verification based on the relative importance of a specific practice to achieving the jurisdiction's WIP nutrient and sediment pollutant load reduction targets. By clearly documenting the relative WIP priority for a BMP or group of related BMPs, a jurisdiction can proceed forward with documenting the verification protocols for that lower contributing BMP/group of BMPs which can be different from the verification of practices accounting for higher levels of pollutant load reductions. The different sets of Sector Verification Guidance provide more detailed guidance on the jurisdiction on how to identify such low contributing BMPs/groups of BMPs.

BMP Grouping
Jurisdictions do not need to develop and document detailed protocols for each individual BMP of the potentially hundreds BMP which their track, verify, and report for nutrient and sediment reduction load credit. Jurisdictions should take their complete listing of tracked and reported BMPs and organize them by the categories that best account for the jurisdiction's relative Watershed Implementation Plan (WIP) priority, any logical grouping of the data specific to the jurisdiction, and consideration of the BMP types described in the relevant Sector Verification Guidance. Then, as presented within the Design Table, the jurisdiction would document the appropriate protocols and procedures followed for each logical grouping of BMPs.

Initial Inspection and Follow-up Checks
The Design Table illustrates the CBP Partnership's BMP Verification Review Panel's recommendation to the jurisdictions for structuring their verification programs to carry out an **initial inspection** for answering the question "is the BMP there?" and then **follow-up checks** carried out at the appropriate frequency to answer the question "is the BMP still there and operating" throughout the lifespan of the practice.

Lifespans and Sunsetting Practices
The Design Table prompts jurisdictions to provide documentation on procedures in place which prompt the need for conducting a follow-up check of a BMP at the end of its approved lifespan. The Design Table calls on jurisdictions to also document procedures for removing BMPs which go beyond their lifespans and are not follow-up checked to confirm the BMP is still there and operational.

Data Quality Assuring, Recording, and Reporting
The Design Table calls on jurisdictions to clearly document the systems/processes the jurisdiction uses to confirm the initial inspections/follow-up checks were conducted, prevent double counting, and quality assure the reported data before it is accepted by the jurisdiction. Given BMP data will likely be reported to a jurisdiction from a multitude of sources outsides of the state agencies, jurisdictions need to have written procedures in place for assuring the quality of the data for which they are now accountable for. The jurisdictions are prompted to document any additional steps taken by the jurisdictions in properly recording the accepted data prior to its reporting through the jurisdiction's NEIEN node.