New York State USC Ag Team
Draft Ag Verification Protocol Concept Comments
CBP Ag Work Group
June 14th, 2012

Introduction

The process for collecting farmer initiated BMPs starts with the New York State Agricultural Environmental Management (AEM) program. AEM is the "umbrella program" that provides a consistent format to efficiently identify and address environmental concerns through a comprehensive on-farm assessment, planning, implementation, and evaluation cycle. AEM is administered and implemented by trained professionals at the local level through county SWCDs and their partners. AEM's on-farm framework is voluntary and is designed to be highly interactive and utilizes resource professionals and peers working with the farmer throughout the process. This framework and associated process increases farmer awareness of the impact farm activities have on the environment; it encourages farmer participation and seeks behavioral changes, which are important overall goals for meeting TMDL allocations. AEM utilizes a five-tiered process that includes inventory, assessment, plan development, implementation and evaluation. Overall we see the AEM program fitting well within the general Draft Chesapeake Bay Program Partnership's BMP Verification Principles and the more specific Draft Ag Verification Protocol Concept Comments. Within the AEM framework, other methods of data collection may be used such as regional AEM data collection meetings, phone surveys, farmer self-certifications, and using aerial imagery/dashboard surveying of cropland.

General Comments

The AEM program and its associated Federal Programs and the NYS Ag Nonpoint Source Abatement and Control Program and General Permitting for Concentrated Animal Feeding Operations (CAFO) provide the framework to use these protocols effectively with farms active in the AEM process and/or permitted farms. What is needed is the development of a finer level of detail within our current system to better capture non-cost shared, non-structural, and annual practices with the funding to match a program at the increased level. Our current framework will capture these farms, but the frequency of contact is not assured. Our comments on the Draft Ag Verification Protocol Concept are broken into 5 categories. They our bulleted below:

Level of Confidence

- Need to clarify the confidence of each individual verification method.
- Within any given verification method, it is important to have standardize protocols to maximize consistency and confidence in the data.

- Need to clarify whether or not there will be diminished credit for methods that have less confidence in their accuracy.
- In practice the NASS Survey protocol doesn't differ much from that of a farmer completing a self-certified inventory. If the former is the basis for most Ag Model inputs, there must be a reasonable level of confidence. Should the farm self-certified inventory receive a similar level of confidence for verification?
- With using farm records, we can assume that a farmer taking time to document farm activities to the level required for CBP reporting will be several steps ahead and therefore there should be a fair level of confidence in the data. The reduction in credit should be minimal, especially if there is spot-checking with records and surveys.

Cost/Benefit

- The relative cost and confidence level are linked. The higher the cost, usually the higher the confidence, lower cost leads to lower degree of confidence.
- In the farm inventory category, as long as each agency/third party/Ag industry professional is being properly trained and compensated, there is no reason that they can't all provide the same level of relative benefit and data confidence.

Frequency

- The Draft Ag Verification Protocol Concept table needs another column to include the frequency at which these assessments need to be conducted to provide reasonable assurance.
- Related to frequency is the duration of the data confidence level. For example, if cover crops are reported in year 1 with 100% confidence through verification, will this BMP then have 100% confidence and thus receive full credit in year 2 without verification?
- We recommend that for each year past the first year an annual BMP is verified and reported you get a reduction in credit until that BMP is verified and then reported again.
- Are the state's standard practice lifespan's good enough for reporting frequency or do they need to be verified at intervals throughout their lifespan? The intervals will likely vary by state and by practice.

Model Credit

- Different verification methods have different levels of confidence in the accuracy of the information received. This should be reflected with associated levels of credit given in the model. Lower confidence equals less credit given and vice versa.
- Under the current system in NY farm inventories by trained federal, state, and/or county agency personnel will likely provide the highest level of confidence and should therefore have the highest level of credit given.

Workload/Funding

- It can be overbearing to go back and verify things that have already been installed, especially the non-cost shared practices
- It is likely that states will have to employ a variety of protocol categories simultaneously. This will be complex and costly, forcing states and local governments to choose between further implementation towards water quality improvements or data verification to feed the model.
- Money to support an increased level of inventory data will be necessary. Where will this money come from?
- Increased verification confidence will require more site visits to the farm which provides opportunities to interact with a farm more, but will be challenging given increased stressed farm economics and government agencies' staff reductions.
- Getting planners, sprayers, nutritionists and other private technicians involved will be helpful to the effort, but there will need to be incentive for these partners to participate. They need to be compensated for their time either by federal and state agencies, the farmers, or both. This may be challenging given governmental budget cutbacks and challenging farm economics.
- Clarification is needed on which entities will bare the costs and which will receive the benefits for each verification method. For example, some verification methods will save the federal or state agencies money but will cost the farmer more.