TETRA TECH

To:	Mark Dubin
From:	Jon Harcum and Steve Dressing
Date:	December 18, 2017, revised February 14, 2018, revised March 6, 2018
Subject:	CBP Technical Support: Producer Survey Recommendation Report

The partners of the Chesapeake Bay Program (CBP) developed and implemented a Framework that will guide improvements to the verification of BMPs reported annually for the purpose of demonstrating and evaluating progress toward achieving the goals of protecting and restoring the Chesapeake Bay. The purpose of this technical memorandum is to provide the Agriculture Workgroup (AgWG) a list of potential recommendations related to appropriate statistical metrics for the establishment of uniform evaluation standards for producer surveys as an alternative approach to agricultural best management practice (BMP) verification. In particular, this technical memorandum targets appropriate measures related to estimating the BMP extent (e.g., total number of acres, total linear feet); and is in response to the CBP partnership's interest in developing and implementing alternative approaches for the verification of agricultural BMPs historically and in the future.

Analysis

A previous technical memorandum developed by Tetra Tech is attached. The analysis in the attached technical memorandum was based on a survey conducted by Penn State University (PSU) and the Pennsylvania Department of Environmental Protection (DEP). In essence, farmers were mailed a conservation practice inventory form (or were provided access to an on-line form) to complete and submit to PSU. Approximately 10 percent of the responses from each county were then randomly selected for field verification by trained PSU Extension agents. PSU concluded that there was no systematic over- or under-reporting for nearly all BMPs with the exception of barnyard acres under E&S/NRCS plans and riparian buffers.

Tetra Tech further examined the data and computed the proportion correct (PC), hit rate (HR), and false alarm rate (FAR) for each reported BMP. The relatively high PC (71-97 percent) across most practices can be attributed to the large fraction of surveys where it was verified that the operation correctly reported that a practice was not in use. HR and FAR were more varied. Typically, low HR values are associated with higher FAR and vice versa. Low HR values indicate that surveys under-reported the number of BMPs while high FAR values indicate over-reporting. Tetra Tech compared the values of FAR and HR to the values identified in the AgWG decision from January 26, 2017 which states:

> *The AgWG approved the following proposed methodology for setting statistical confidence standards for BMPs submitted through alternative verification methods: use of a two-step process, wherein the first step requires a sample size greater than or equal to 20[1], a False Alarm Rate (FAR) threshold of 0.2 or below (upper 90%*

[1] Note that the standard established by the Agricultural Modeling Subcommittee and the CBPO have been set at 30 data points as a minimum.

confidence limit value), and a Hit Rate (HR) threshold of 0.7 or greater (lower 90% confidence limit value). If the previous conditions are met, the second step of this process would correct for bias in the BMP quantity by using the ratio of Post-Agreement Rate (PAG)/Hit Rate (HR) (lower 90% confidence limit value). This recommendation will remain in place until modified by the AgWG at a future time based upon additional data to help inform these recommendations.

Applying the above thresholds for FAR and HR would eliminate 26 of the 30 BMPs considered in the producer survey conducted by PSU and DEP. Perhaps these results are expected since the initial data are collected through a producer survey and achieving consistency in producer responses is a known challenge. As pointed out in the PSU survey report, differences in survey responses and field verification by experts can result from inconsistent understanding of the questions to be addressed. Better results should result from better and consistent communication.

However, recall that the data evaluated in this technical memorandum are related to BMP extent (e.g., total number of BMP acres, total BMP linear feet) and not "counts" of BMPs. So, while the January 26, 2017 AgWG decision was made on the broader overview of alternative BMP verification, it might be appropriate to consider the confidence interval associated with the state watershed- and/or county-wide estimates of total BMP acreage or linear feet.

PSU computed state watershed-wide estimates (including confidence intervals) for several of the BMPs using a 'mean difference' approach (see Table 1). The reported and expected results are the state watershed-wide estimates of BMPs from the producer survey and corrected estimates based on field verification, respectively.

Table 1. State watershed wide estimates of BMP implementation.

Practice	Reported Results	Expected Results	90% Confidence Interval Half Width	90% Confidence Interval Half Width as % of Expected	95% Confidence Interval Half Width	95% Confidence Interval Half Width as % of Expected
Nutrient Management Plans – Row Crops (Ac)	335,250	350,103	28,483	8.1	33,953	9.7
Enhanced Nutrient Mgt (ac)	97,562	82,303	36,414	44.2	43,407	52.7
Agricultural E&S Plans – Row crops (ac)	40,170	60,380	26,808	44.4	31,957	52.9
Conservation Plans – Row crops (ac)	173,481	229,636	104,998	45.7	125,163	54.5
Stream Bank Fencing (linear feet)	1,336,100	2,293,651	377,437	23.0	464,296	26.8
Watercourse Access Control (ac)	795	1730	444	60.8	588	69.2
Riparian Buffers (ac)	9,013	6,770	1,688	60.9	2,246	69.1

PSU also computed the 95 percent confidence interval half width for the state watershed total of each BMP. Tetra Tech divided the 95 percent confidence interval half width by the expected result (see *95% Confidence Interval Half Width as % of Expected*) and added corresponding values for the 90% confidence level. For example, 1.3 million feet of stream bank fencing was reported in the producer survey. Based on field verification, PSU estimates a total of 2.3 million feet of stream bank fencing with a +/-0.5 million (1.8-2.8 million) feet of stream bank fencing at

the 95 percent confidence level. The +/-0.5 million feet of stream bank fencing is 26.8 percent of the expected results of 2.3 million feet of stream bank fencing.

Tetra Tech furthered PSU's analysis of state watershed-wide confidence intervals to include county-level totals of BMPs using a general linear model (GLM). Tetra Tech concluded that it was possible to compute state watershed- and county-level total BMP acreage estimates; and found that it may be possible to compute somewhat smaller state watershed-level confidence intervals with the GLM. The reader is referred to the attached technical information for further information about the GLM.

Recommendation

All field-verified BMPs can be counted and reported consistent with the Chesapeake Bay Program Partnership's guidance "Strengthening Verification of Best Management Practices Implemented in the Chesapeake Bay Watershed: A Basin Framework." The following recommendations apply only to the extension of verification results to the non-verified portion of the sample population through statistical analysis of the verification data.

Based on the above analyses, the following candidate recommendations for a two-tiered approach are made for purposes of AgWG discussion. The first step would be to ensure that the data are of suitable quality:

1. Only the results from producer surveys that include follow-up, independent verification using a stratified random sample of the returned mail surveys may be used.
2. Follow-up verification must be made using a 10 percent (or greater) random sample for each stratum (e.g., county) and a minimum of two (2) samples per BMP and stratum[2].
3. Any statistical adjustments made to the survey results only apply to the data set of returned surveys and cannot be used to extrapolate to non-respondents.

For reporting purposes, use the greater of the verified acreage or the lower 90% confidence interval determined by the approach taken to adjust survey data based on field verification. Adjustments can be made using either the mean-difference approach applied by PSU or by using the GLM approach described in the attached technical memorandum. While the PSU approach is simpler to apply, the GLM approach (Equation 3 in the attached) will yield a smaller standard error and, therefore, smaller confidence intervals.

Candidate recommendations for FAR and HR were considered but ultimately not included here for the reasons discussed earlier in this document. Note that we also considered the inclusion of a confidence interval half-width size as a recommendation (see Table 1), but ultimately decided to recommend use of the lower 90% confidence interval for consistency with the remote sensing recommendations.

If the AgWG approves the above, or some variant of the above, candidate recommendations, then the following general requirements are necessary to implement the GLM procedure:

- A detailed verification data set which includes the county name, reported BMP acreage (or linear feet) and verified acreage (or linear feet). For each BMP, a minimum of two observations are needed in each county per BMP.

[2] Variability in agricultural systems across the survey area may indicate a need for more samples per stratum.

- For each BMP, county- and state watershed-level BMP summary information that includes the number of returned surveys, the number of surveys with zero reported BMP acreage (or linear feet), the number of surveys with non-zero reported BMP acreage (or linear feet), and total reported BMP acreage (or linear feet) for each county and the state overall.

After some experience is gained with this procedure, it may be appropriate to relax the minimum sampling percentage. This would allow states to reduce their verification costs.

Attachment A: March 17, 2017 Technical Memorandum

TETRA TECH

To:	Mark Dubin
From:	Jon Harcum and Steve Dressing
Date:	March 7, 2017, revised March 17, 2017
Subject:	CBP Technical Support: Producer Survey Evaluations

Multiple methods exist to document the extent of non-cost-shared annual and multi-year structural best management practices (BMPs) as identified by the Chesapeake Bay Program Partnership's publication entitled "Strengthening Verification of Best Management Practices Implemented in the Chesapeake Bay Watershed: A Basin Framework."[3] This technical memorandum provides an overview of a procedure that could be used to evaluate a self-certified assessment inventory (e.g., mail-in survey, online survey, etc.) that includes follow-up in-person verification using a stratified random sample of the returned producer surveys. The procedures described here could be extended to address follow-up independent verification that uses alternative sampling strategies for selecting surveys to verify.

This technical memorandum does not address selection of an appropriate survey tool (e.g., online versus mail-in), but the method described here can be used to evaluate any survey that meets the criteria described in the Summary and Discussion.

This technical memorandum assumes that independent field verification yields the truth about the presence or absence of BMPs, as well as their operation and maintenance. The specific methods for assessing the presence or absence of BMPs are not addressed by this technical memorandum.

1.0 Background

Penn State University (PSU) and the Pennsylvania Department of Environmental Protection (DEP) undertook an agricultural conservation practice inventory (survey) to capture data on visual and non-visual non-cost-share BMPs for reporting and crediting in the Bay model (PSU 2016). The survey methodology is described in briefing materials (DEP 2016b) and a methodology report (PSU 2016). In essence, farmers were mailed conservation practices inventory forms to complete and submit to PSU. Approximately 10 percent of the responses from each county were then randomly selected for field verification by trained PSU Extension agents. Results from farmer inventories were compared against in-field independent inventories to assess the accuracy of the method. Of an estimated 33,610 farms in Pennsylvania's portion of the Chesapeake Bay watershed, PSU sent inventories to approximately 20,000 farms. A total of 6,782 surveys were returned (34%) and approximately 10 percent of the responses (710 farms) were selected for on-site verification.

PSU concluded that there was no systematic over- or under-reporting for nearly all BMPs (Royer 2016). The exceptions to this are barnyard acres under E&S/NRCS plans and riparian buffers. These practices both showed systematic over-reporting. Because their analysis showed that the over-reporting of these particular practices is statistically significant, PSU believes that an

[3] http://www.chesapeakebay.net/publications/title/strengthening_verification_of_best_management_practices_implemented_in_the

adjustment factor could be applied to adjust the cumulative dataset downward. PSU also believes that the systematic over-reporting of riparian buffer acres may be attributed to differences between the way the questions were asked in the farm survey regarding buffers and stream bank fencing, and how Extension agents were trained to record these answers during the on-farm visits.

Previously (Tetra Tech, 2016) reported on basic measures of statistical accuracy using proportion correct (PC), hit rate (HR), and false alarm rate (FAR) (see Table 1). The relatively high PC across most practices can be attributed to the large fraction of surveys where it was verified that the operation correctly reported that a practice was not in use. HR and FAR were more varied. This technical memorandum extends Tetra Tech's previous analysis to include a procedure that can be used to estimate state- and county-level acreages after adjusting for survey verification.

Table 1. Measures of survey accuracy.

Practice	Subcategory	Proportion Correct (PC)	PC Range at 90% Confidence Level	Hit Rate (HR)	False Alarm Ratio (FAR)
	Row Crops	0.85	83-87%	0.77	0.13
	Pasture Acres	0.81	78-83%	0.62	0.19
	Hay Acres	0.80	78-82%	0.67	0.24
	Privately Funded Act 38 Row Crop Acres	0.93	92-95%	0.26	0.46
	Privately Funded Act 38 Pasture Acres	0.94	92-95%	0.14	0.60
	Privately Funded Act 38 Hay Acres	0.93	92-95%	0.09	0.69
	Privately Funded NRCS 590 Row Crop Acres	0.95	94-96%	0.21	0.68
	Privately Funded NRCS 590 Pasture Acres	0.97	96-98%	0.24	0.71
	Privately Funded NRCS 590 Hay Acres	0.95	94-97%	0.23	0.75
	Manure Management Plans on Row Crop Acres	0.84	82-86%	0.61	0.39
	Manure Management Plans on Pasture Acres	0.84	82-86%	0.49	0.40
	Manure Management Plans on Hay Acres	0.85	83-87%	0.60	0.43
	Advanced Nutrient Management	0.83	81-86%	0.35	0.69
E&S Plans	Row Crop Acres	0.90	89-92%	0.30	0.46
	Pasture Acres	0.92	91-94%	0.30	0.48
	Hay Acres	0.93	91-94%	0.27	0.44
	Barnyard Acres	0.96	94-97%	0.17	0.73
NRCS Plans (privately funded)	Row Crop Acres	0.81	79-84%	0.35	0.57
	Pasture Acres	0.86	84-88%	0.28	0.58
	Hay Acres	0.85	83-87%	0.31	0.58
	Barnyard Acres	0.94	92-95%	0.16	0.78
Stream Bank Fencing	Fencing Length (Ft.)	0.88	86-90%	0.71	0.15
	Distance from Stream to Fence (Ft.)	0.87	86-89%	0.74	0.19
	Public Funded Fencing (Ft.)	0.93	92-95%	0.69	0.25
	Privately Funded Fencing (Ft.)	0.87	86-89%	0.53	0.30
	Acres of Buffer	0.87	85-89%	0.70	0.19
	Acres of Privately Funded Buffer	0.87	85-89%	0.53	0.34

Practice	Subcategory	Proportion Correct (PC)	PC Range at 90% Confidence Level	Hit Rate (HR)	False Alarm Ratio (FAR)
Riparian Buffers	Buffer Acres	0.71	68-73%	0.45	0.50
	Privately Funded Buffer Acres	0.77	74-79%	0.29	0.70
	Buffer Width	0.71	68-73%	0.48	0.49

2.0 Approach

Lumley (2010) proposes applying ratios or general linear models (GLMs) for adjusting survey results to account for under- or over-reporting. Because the author noted that GLMs will generally result in estimates with smaller confidence intervals, the GLM method was chosen for this technical memorandum. In this analysis, we used the R integrated suite of software facilities (R Core Team, 2016) and the "survey"[4] package (Lumley 2004 and 2016). Note that similar analytical tools are available in SAS®. Advantages of using a survey-based analytical tool over traditional GLM tools include the abilities to correctly compute the standard errors for a variety of sampling strategies and to account for finite populations.

Selection and development of a model should consider the available data. Figure 1 displays the verified acreage as a function of self-reported acreage using the PSU/DEP verification data for row crops, and is typical of data sets for other BMPs in the PSU/DEP study related to acreage estimates. Although the PC is 85 percent, 371 of the correctly classified results are attributed to observations with zero reported and zero verified acreage (green circle). In Figure 1, there are 70 errors of omission, i.e., the observations in the blue rectangle, and 35 errors of commission, i.e., the observations in the black dashed rectangle. There is one observation with a reported acreage of 11,000 that appears to be an outlier relative to the other data.

Given the characteristics of the above data set (i.e., the large number of zero reported acreage), it is recommended to develop a general linear model that accounts for the zero and non-zero reported acreage separately. This can be achieved by using the model shown in Equation 1.

$$Y = \beta_0 + \beta_1 X_1 + \beta_2 X_1 X_2 \qquad \text{Eq. 1}$$

where

Y = the verified acreage,
X_1 = indicator variable (0: reported acreage=0, 1: reported acreage>0),
X_2 = reported acreage, and
$\beta_0, \beta_1,$ and β_2 = regression coefficients.

Equation 1 can be simplified by substituting in 0 and 1 for X_1 to yield Equation 2.

$$Y = \begin{matrix} \beta_0 & for\ X_1 = 0 \\ (\beta_0 + \beta_1) + \beta_2 X_2 & for\ X_1 = 1 \end{matrix} \qquad \text{Eq. 2}$$

As can be seen from Equation 2, $\beta_0 + \beta_1$ is the y-intercept and β_2 is the slope for non-zero reported acreage observations.

[4] https://CRAN.R-project.org/package=survey

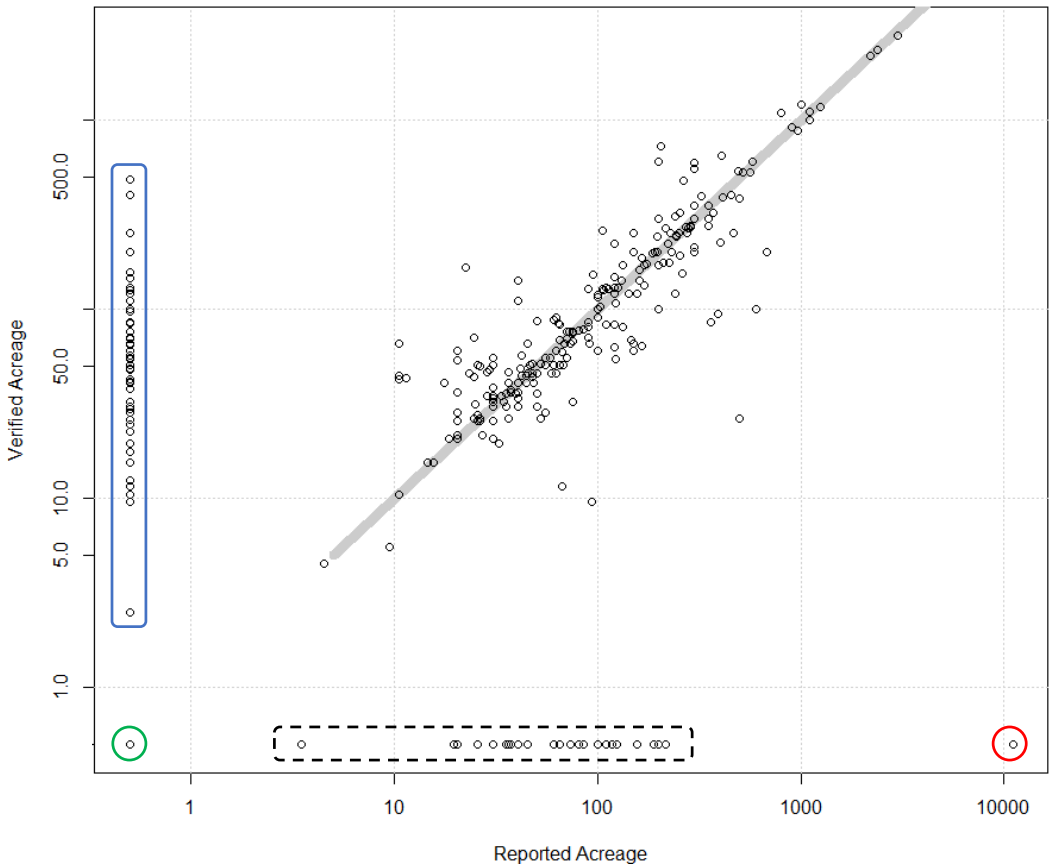

Figure 1. Verified acreage as a function of self-reported acreage for row crops. (All points are offset by adding 0.5 to facilitate plotting on a log scale. Points within blue rectangle: 70 observations with 0 reported acres and >0 verified acres. Points within black dashed rectangle: 35 observations with >0 reported acres and 0 verified acres. Points within green circle: 371 observations with 0 reported and verified acres. Points within red circle: 1 potential outlier with 11,000 reported and 0 verified acres. Grey line: 1:1 slope.)

Depending on the model fit, it may be appropriate to set the y-intercept term to zero. This can be achieved by introducing another indicator variable, X_0, which is 1 for zero reported acreage and zero otherwise (i.e., the opposite of X_1). The general equation is

$$Y = \beta_0 X_0 + \beta_2 X_1 X_2 \qquad \text{Eq. 3}$$

and the simplified model (substituting in for X_0 and X_1) is

$$Y = \begin{matrix} \beta_0 & for\ X_1 = 0\ and\ X_0 = 1 \\ \beta_2 X_2 & for\ X_1 = 1\ and\ X_0 = 0 \end{matrix} \qquad \text{Eq. 4}$$

In either case (i.e., Equation 1 or 3), the value of β_0 will correspond to the mean verified acreage for surveys where the reported acreage is zero. The functions *survey::svydesign*, *survey::svyglm*, and *stats::predict* can then be used to compute the model coefficients and estimate the state and county level totals. In our application of *survey::svydesign*, we set the strata argument to county because the procedure to select samples from the returned surveys was based on a post-stratification based on county.

3.0 Application for Statewide Estimate

Results from applying the approach described in Section 2 to the DEP/PSU row crop data are presented here. Note that it is necessary to have two or more observations per county to apply the strata argument. For the row crop data, the single samples in the verification data set for Elk and Jefferson counties were aggregated with Clearfield county; Sullivan county with Columbia county; and Wyoming County with Luzerne.

The state level results and model fits are shown in Table 2 and Figure 2, respectively. The red line uses the Equation 1 model and the entire verification data set. The blue line also uses the Equation 1 model but excludes the outlier circled in Figure 1. Finally, the black line uses the Equation 3 model and excludes the outlier.

The Equation 3 model is preferred given the lower standard error and visual inspection of Figure 2. The state estimate of 364,850 acres has 90% confidence intervals of 347,508—382,191 acres. Note, that the 90% confidence intervals do not contain the reported acreage of 335,250.

Table 2. Statewide row crops estimates.

Model	Estimated State Total	Standard Error	90% Lower Confidence Level	90% Upper Confidence Level
Equation 1	418,463	33,342	363,615	473,310
Equation 1 (exclude outlier)	355,062	15,014	330,364	379,760
Equation 3 (exclude outlier)	364,850	10,542	347,508	382,191

The approach to developing a model should generally follow the same best practices that would be used for any regression. For example, if there were enough county-level samples taken, then it might make sense to evaluate whether to add county as a covariate. Adding county to the Equation 3 model and simplifying would result in county-specific β_0 values as shown in Equation 5 where i represents the county.

$$Y = \begin{matrix} \beta_{0,i} & for\ X_1 = 0\ and\ X_0 = 1 \\ \beta_2 X_2 & for\ X_1 = 1\ and\ X_0 = 0 \end{matrix} \qquad \text{Eq. 5}$$

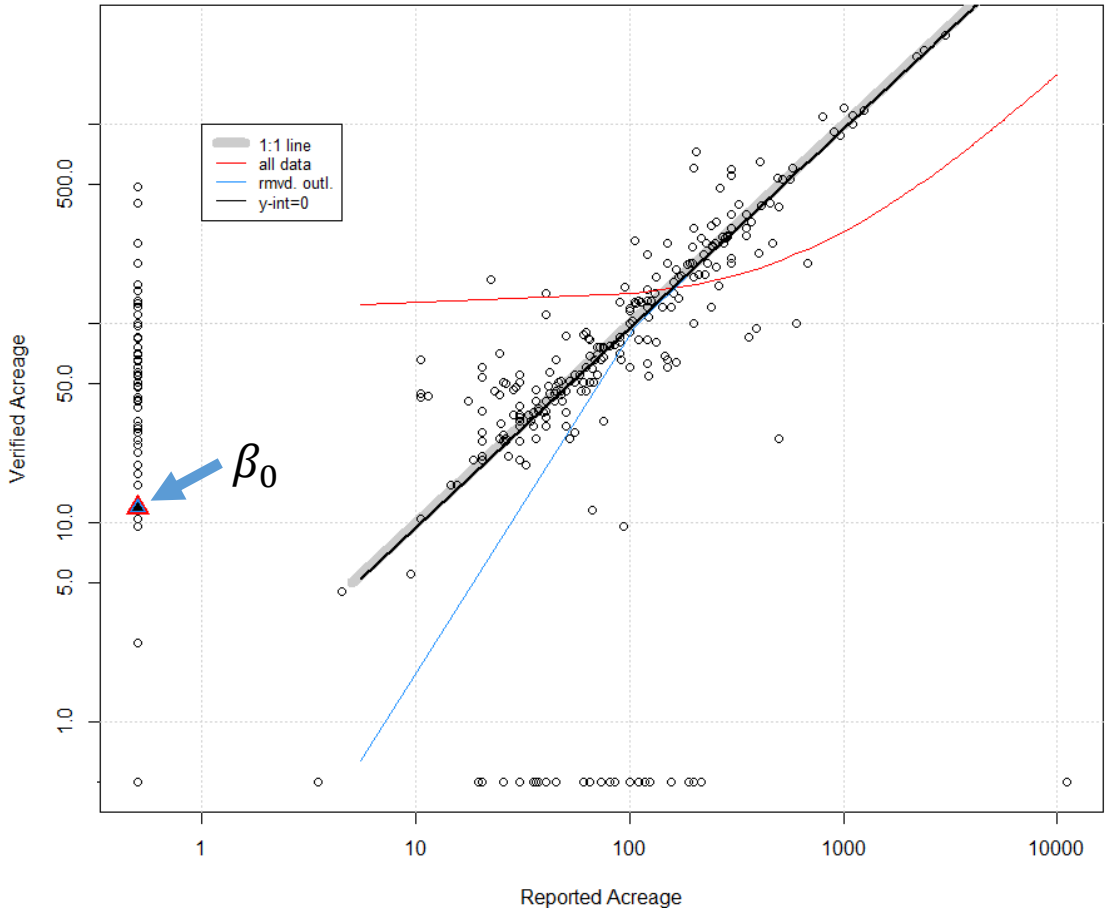

Figure 2. Verified acreage as a function of self-reported acreage for row crops together with model fits. (Fitted GLMs: Red line—Equation 1; Blue line—Equation 1, exclude outlier; Black line—Equation 3, exclude outlier.)

4.0 Hypothetical Extension to County Estimates

The Equation 3 model developed in Section 3.0 can also be applied to county level data. However, county level summary information was not available for this analysis. Therefore, a hypothetical county summary of row crop data was created for demonstration. Table 3 presents the hypothetical number of returned surveys, the number of surveys with zero reported acreage, the number of surveys with non-zero reported acreage, and total reported acreage for each county. Figure 3 presents the hypothetical predicted row crop acreage with 90% confidence intervals.

Table 3. Hypothetical county summary for row crops.

County	Returned Surveys	Surveys with Zero Reported Acreage	Surveys with Non-zero Reported Acreage	Total Reported Acreage
Adams	210	153	57	9,513
Bedford	191	153	38	2,072
Berks	96	38	58	3,952
Blair	124	86	38	5,228
Bradford	296	220	76	10,025
Cambria	57	57	-	-
Centre	229	105	124	11,050
Chester	172	86	86	6,457
Clearfield[A]	57	19	38	2,270
Clinton	67	29	38	2,113
Columbia[A]	191	162	29	1,050
Cumberland	191	124	67	20,453
Dauphin	105	38	67	11,315
Franklin	372	210	162	18,000
Fulton	105	67	38	4,227
Huntingdon	115	77	38	4,844
Indiana	38	38	-	-
Juniata	105	57	48	6,000
Lackawana	29	19	10	196
Lancaster	1,500	793	707	99,154
Lebanon	201	86	115	15,407
Luzerne[A]	76	67	9	74
Lycoming	240	173	67	5,137
McKean	38	29	9	150
Mifflin	124	57	67	5,146
Montour	115	77	38	7,726
Northumberland	124	86	38	8,750
Perry	201	115	86	15,649
Potter	67	67	-	-
Schuylkill	143	76	67	4,130
Snyder	162	143	19	9,809
Somerset	38	29	9	352
Susquehanna	267	181	86	2,369
Tioga	220	172	48	5,804
Union	143	76	67	6,700
Wayne	29	19	10	125
York	344	229	115	30,003
Total	**6,782**	**4,213**	**2,569**	**335,250**

[A] Elk and Jefferson, Sullivan, and Wyoming counties were assumed to be aggregated with Clearfield, Columbia, and Luzerne counties, respectively.

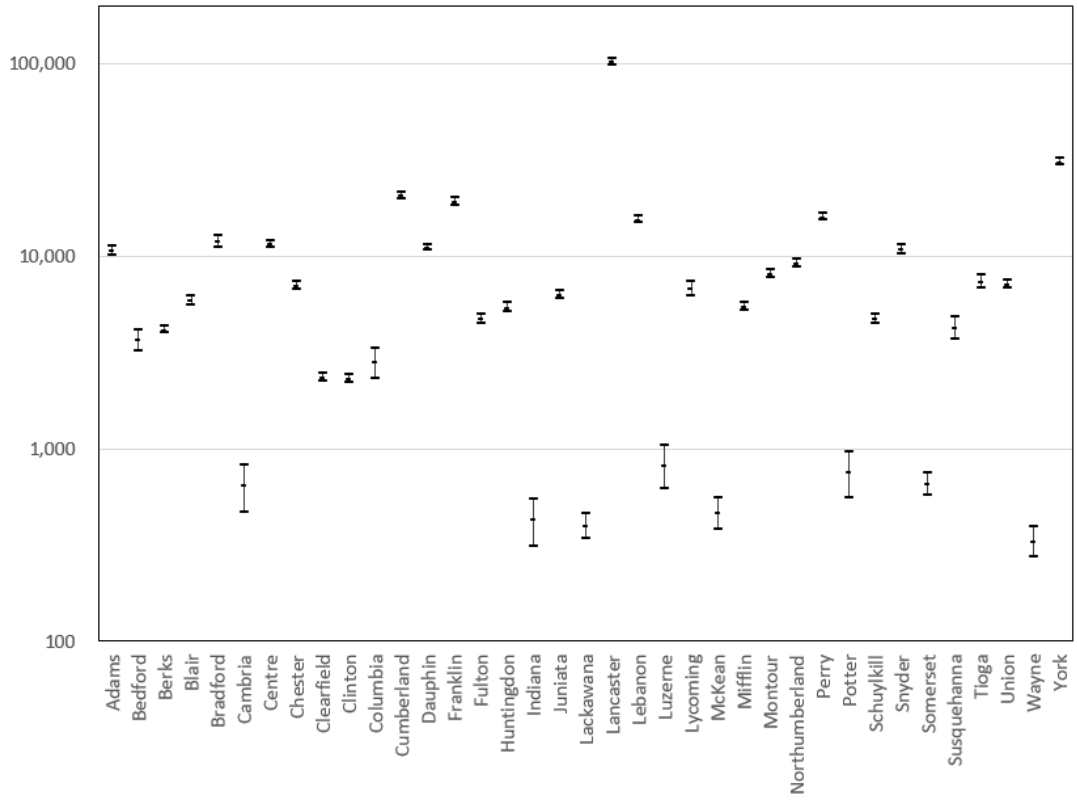

Figure 3. Hypothetical predicted row crop acreage with 90% confidence intervals.

5.0 Summary and Discussion

This technical memorandum presents an overview of a procedure that could be used to evaluate a self-certified assessment inventory (e.g., mail-in survey) that includes the follow-up independent verification using a stratified random sample of the returned mail surveys.

The general requirements for the procedure, as portrayed in this technical memorandum, include the following:

- A detailed verification data set which includes the county name, reported acreage and verified acreage. A minimum of two observations are needed in each county.
- County- and state-level summary information that includes the number of returned surveys, the number of surveys with zero reported acreage, the number of surveys with non-zero reported acreage, and total reported acreage for each county and the state overall.

With the above information, it is possible to compute overall metrics such as PC, HR, and FAR as well as state- and county-level total acreage estimates as illustrated in Table 4. The Agriculture Workgroup may want to consider both these metrics and the procedure presented here when developing criteria for determining the suitability of data collected from a producer survey.

Table 4. Summary of row crop information with 90 percent confidence intervals.

Subcategory	Reported State Acreage	Proportion Correct (PC)	Hit Rate (HR)	False Alarm Ratio (FAR)	Adjusted State Acreage
Row Crops	335,250	85% (83-87%)	77% (73-81%)	13% (10-17%)	364,850 (347,508-382,191)

6.0 References

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Attachment B: Comments on Draft (12-18-2017, revised 12/14/2018)

Frank Schneider, Pennsylvania State Conservation Commission

Page 1:

1. We believe that Tetra Tech was objective in their analysis, and I appreciate that objectivity.

No response.

2. The protocol that is explained below is extremely rigorous and I am not 100% sure it is well founded in science.

Response: While the mathematical approach is sound, we agree that best professional judgment is required. In addition, adjusting the approach may be warranted as results of its application are documented in practice.

Comments #3-5 refer to this text: In particular, this technical memorandum targets appropriate measures related to estimating the BMP extent (e.g., total number of acres, total linear feet); and is in response to CBP partnership's interest to develop and implement alternative approaches for the verification of agricultural BMPs historically and in the future.

3. Although this memo and report is dealing with Producer Survey, I believe the AgWG needs to still have a discussion and come to conclusion on remote sensing information collection, verification, and inclusion in the model. Both surveys and remote sensing will be areas of interest to each state.

Response: We concur.

4. I was a little surprised at this report as I believed the AgWG had already made the decision in 2017. This just goes to prove that surveys and remote sensing are a "Moving Target" and the criteria keeps changing. This needs to be agreed upon and put to bed, so states can start to develop Strategies.

Response: The recommendation was updated to report the lower 90% confidence limit on acreage or linear feet to better align with the recommendations for remote sensing, and in direct follow-up response to the Workgroup's defining decision statement from January 26, 2017 that the recommendation will remain in place until modified by the AgWG at a future time based upon additional data to help inform these recommendations.

5. With remote sensing, all practices are Geo-referenced and can be verified at any time (1 year, 5 years, 10 years, 15 years, etc.) That is a big advantage.

No response.

6. As an AgWG we should look at the sample size again. We don't know what producers will respond to a survey (or remote sensing). An example would be a survey sent to all farmers in one county. 1 or 2 poultry producers responded, but 30 dairy producers respond. The poultry producers (lets say 30 in county, but only 2 respond) report mortality composters but 0 of the dairy producers report mortality composters. Having a sample size of 20, would throw out the mortality composters that were reported by poultry.

Comment refers to this text: Tetra Tech compared the values of FAR and HR to the values identified in the AgWG decision from January 26, 2017 which states:

> *The AgWG approved the following proposed methodology for setting statistical confidence standards for BMPs submitted through alternative verification methods: use of a two-step process, wherein the first step requires a sample size greater than or equal to 20, a False Alarm Rate (FAR) threshold of 0.2 or below (upper 90% confidence limit value), and a Hit Rate (HR) threshold of 0.7 or greater (lower 90% confidence limit value). If the previous conditions are met, the second step of this process would correct for bias in the BMP quantity by using the ratio of Post-Agreement Rate (PAG)/Hit Rate (HR) (lower 90% confidence limit value). This recommendation will remain in place until modified by the AgWG at a future time based upon additional data to help inform these recommendations.*

Response: Adjustments to the approach may be warranted as results of its application are documented in practice.

Page 2:

7. What 4 BMPs would count? Are those 4 BMPs points, are they counted in either acres or feet?

Comment refers to this text: Applying the above thresholds for FAR and HR would eliminate 26 of the 30 BMPs considered in the producer survey conducted by PSU and DEP. Perhaps these results are expected since the initial data are collected through a producer survey and achieving consistency in producer responses is a known challenge.

Response: The four practices (as reported by PSU) that would count are nutrient management row crop acres, stream bank fencing (feet), stream bank fencing distance from stream to fence (feet), and stream bank fencing acres of buffer.

8. Not sure I agree that we need to do anything different from what was previously approved. A BMP is a BMP, it shouldn't matter if it's a point, acre, or feet.

Comment refers to this text: However, recall that the data evaluated in this technical memorandum are related to BMP extent (e.g., total number of BMP acres, total BMP linear feet) and not "counts" of BMPs. So while the January 26, 2017 AgWG decision was made on the broader overview of alternative BMP verification, it might be appropriate to consider the confidence interval associated with the state watershed- and/or county-wide estimates of total BMP acreage or linear feet.

Response: Our analysis indicated that there is a need to handle acreage and feet differently from counts.

9. My suggestion would be to go with the reported results for inclusion into the model. The verification (20 or more) prove that the reported results are correct. By trying to extrapolate expected results, just leads to more people questioning what is put into the model and more "research and time" trying to figure a "better" method. The only thing that should be added is any results that were not reported that were physically seen by the verifier.

Comment refers to Table 1.

Response: The report's recommendations were modified to address the separate management and use of field verified BMPs as part of the BMP verification sampling process on page 3 of the report, which now states that all field-verified BMPs can be counted and reported consistent with the Chesapeake Bay Program Partnership's guidance "Strengthening Verification of Best Management Practices Implemented in the Chesapeake Bay Watershed: A Basin Framework". The reported findings from the PSU study that were previously approved by the Workgroup for use in the development of the CBP Phase 6 modeling tools and are presently represented in the tools are not affected by the findings of this report.

Page 3:

10. I understand the process and wanting to get as much information into the model as we can. I just feel it's much more simpler and not as questionable, by some, if we would stick to reported BMPs (if verification confident) and any additional BMPs that were found by a verifier during the verification process.

Comment refers to this text: Tetra Tech furthered PSU's analysis of state watershed-wide confidence intervals to include county-level totals of BMPs using a general linear model (GLM). Tetra Tech concluded that it was possible to compute state watershed- and county-level total BMP acreage estimates; and found that it may be possible to compute somewhat smaller state watershed-level confidence intervals with the GLM. The reader is referred to the attached technical information for further information about the GLM.

Response: This is something that should be decided by the Agriculture Work Group.

Comments #11-15 refer to items 1-4 in the Recommendation.

11. Agree

Comment refers to item 1: Only the results from producer surveys that include follow-up, independent verification using a stratified random sample of the returned mail surveys may be used.

No response.

12. OK

Comment refers to item 2: Any statistical adjustments made to the survey results only apply to the data set of returned surveys and cannot be used to extrapolate to non-respondents.

No response.

13. Can live with.

Comment refers to item 3. Follow-up verification must be made using a 10 percent (or greater) random sample for each stratum (e.g., county) and a minimum of two (2) samples per BMP and stratum.

No response.

14. How many linear feet?

Comment refers to item 4. The 90% confidence interval half-width cannot exceed the greater of 10% of the predicted total or 200 acres (or linear feet) for any state watershed-wide or stratum-specific estimate.

Response: This recommendation was removed.

15. Is it just simpler to do 1-3 and any other BMPs that the verifier found?

Comment refers to item 4. The 90% confidence interval half-width cannot exceed the greater of 10% of the predicted total or 200 acres (or linear feet) for any state watershed-wide or stratum-specific estimate.

Response: Recommendation was updated.

16. Wouldn't it be simpler and not as questionable, by some, if we would stick to reported BMPs (if verification confident) and any additional BMPs that were found by a verifier during the verification process.

Comment refers to this text: The second step would be to adjust the survey data based on field verification data. Adjustments could be made using either the mean-difference approach applied by PSU or by using the GLM approach described in the attached technical memorandum. While the PSU approach is simpler to apply, the GLM approach (Equation 3 in the attached) will yield a smaller standard error and therefore smaller confidence intervals.

Response: This is something that should be decided by the Agriculture Work Group.

17. Feet, or count (as well).

Comment refers to this text: A detailed verification data set which includes the county name, reported BMP acreage and verified acreage. For each BMP, a minimum of two observations are needed in each county per BMP.

Response: Recommendation was updated to include linear feet.

18. Feet or count, as well.

Comment refers to this text: A detailed verification data set which includes the county name, reported BMP acreage and verified acreage. For each BMP, a minimum of two observations are needed in each county per BMP.

Response: Recommendation was updated to include linear feet.

Page 4:

19. Feet or count, as well.

Comment refers to this text: For each BMP, county- and state watershed-level BMP summary information that includes the number of returned surveys, the number of surveys with zero reported BMP acreage, the number of surveys with non-zero reported BMP acreage, and total reported BMP acreage for each county and the state overall.

Response: Recommendation was updated to include linear feet.

Comment #20-22 are made after the recommendations section.

20. So if I read this correct, if verifiers picked up more practices it is counted against the survey or remote sensing when statistically analyzed. That to a non statistician doesn't seem right. Would this not lead to a verifier ONLY verifying the data in the survey or remote image and not added additional practices for the sake of adding more practices to the model.

Response: Additional practices found by verifiers are factored into the adjustments and can be reported for BMP implementation crediting as per the inserted recommendation statement on page three which states All field-verified BMPs can be counted and reported consistent with the Chesapeake Bay Program Partnership's guidance "Strengthening Verification of Best Management Practices Implemented in the Chesapeake Bay Watershed: A Basin Framework".

21. It seems that depending upon the statistical method utilized, the results could be different. Tetra Tech made the point that the GLM method is more challenging than the Mean-difference method. Penn State utilized the Mean-difference method, in their Statistics analytics laboratory, which didn't seem to be noted as an incorrect statistical analysis methodology.

Response: We concur that the results will usually be different. Because the PSU method is more conservative (i.e., larger confidence intervals), the estimate using the lower 90% confidence interval will be lower than an estimate developed using the GLM method.

22. PA could possible vote in favor of that both methods be approved for use, for the jurisdictions to decide which one best fits their scenario. We are concerned that the approval of this statistical method would override the original approval from 2017. We would not be supportive of the approval of this new method if this is the only way to do it in the future.

Response: This is something that should be decided by the Agriculture Work Group.

Page 5:

23. We may need to have a discussion on the credentials of verifiers? If someone is well versed in BMPs and NRCS standards, there shouldn't be an issue.

Comment refers to this text: This technical memorandum provides an overview of a procedure that could be used to evaluate a self-certified assessment inventory (e.g., mail-in survey, online survey, etc.) that includes follow-up in-person verification using a stratified random sample of the returned producer surveys.

Response: This is something that should be decided by the Agriculture Work Group. The Chesapeake Bay Program Partnership's guidance "Strengthening Verification of Best Management Practices Implemented in the Chesapeake Bay Watershed: A Basin Framework" *includes specific language addressing the credentials of the verifiers for agricultural BMPs. The supporting BMP Expert Panel recommendations reports for Phase 6 also supplement the Basin Framework document with additional verification information specific for the BMP(s) that are addressed by the reports.*

Jeremy Hanson, Virginia Tech

Page 1:

1. "as an alternative to ag BMP verification"....for what, exactly? Non-cost-shared practices? Visual, multi-year? Visual, single year? Non-visual? Or all of the AgWG's practice categories? If there are specific connections to the terminology or framework in the AGWG's verification guidance it would help to use consistent language and make those connections explicitly.

Comment refers to this text: The purpose of this technical memorandum is to provide the Agriculture Workgroup (AgWG) a list of potential recommendations related to appropriate statistical metrics for the establishment of uniform evaluation standards for producer surveys as an alternative approach to agricultural best management practice (BMP) verification. In particular, this technical memorandum targets appropriate measures related to estimating the BMP extent (e.g., total number of acres, total linear feet); and is in response to CBP partnership's interest to develop and implement alternative approaches for the verification of agricultural BMPs historically and in the future.

Response: This is something that should be decided by the Agriculture Work Group. For example, the PSU producer survey and subsequent field verification included visual and non-visual BMPs, as well as cost-shared and non-cost shared BMPs.

2. Survey for ALL implemented practices? Or only for non-cost-shared practices? If the respondents include cost-shared BMPs - or if there's a risk they do so - is there a way to prevent double-counting? If nothing meets the criteria for progress reporting then this isn't an issue. However, if, for example, the stream exclusion fencing met the statistical thresholds then can PA ensure they aren't double-counting any of the linear feet?

Comment refers to this text: A previous technical memorandum developed by Tetra Tech is attached. The analysis in the attached technical memorandum was based on a survey conducted by Penn State University (PSU) and the Pennsylvania Department of Environmental Protection (DEP). In essence, farmers were mailed a conservation practice inventory form (or were provided access to an online form) to complete and submit to PSU.

Response: This is something that should be decided by the Agriculture Work Group. For example, the PSU producer survey and subsequent field verification specifically addressed the originating financial and technical resources of the BMP(s) included in the study, i.e. cost-shared versus non-cost shared practices.

Page 3:

3. I suppose the third step is reporting the adjusted data for progress. However, it seems to me that the partnership and EPA need to agree on what exactly gets reported in this kind of situation. NM was the only practice to meet the criteria, but the survey results give one number, the field visits another number, and then we have the confidence intervals. So, presumably we use the value from the visits by the trained extension agents, not the survey responses? However, the CI suggests we are 90% confident that the ACTUAL value is somewhere within +- 28,000 acres...so maybe the states should report the value at the lower bound of the 90% confidence interval? That conversation/decision that is outside the scope of this document, but perhaps this report can articulate that discussion as a next step for the partnership.

Comment refers to this text: The second step would be to adjust the survey data based on field verification data.

Response: The recommendation was changed to have the states report the value at the lower bound of the 90% confidence interval.