

STAC BMP Verification Subgroup

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Timeline

- March 2013: CBP made request for STAC input on BMP verification evaluation and oversight procedures and processes
- June 2013: STAC subgroup tasked with reviewing “Partnership Process for Evaluation and Oversight” section (Section 12) of draft BMP Verification Framework documentation
 - June 18: Conference call with Rich Batiuk to become familiar with BMP verification work/process
 - June 28: Subgroup conference call
 - July 1: Subgroup submitted draft comments to CBP
 - July 15: Draft BMP Verification Framework released
 - July 30: Follow-up conference call with Rich Batiuk
 - August 7: Subgroup conference call
 - August 15: Subgroup submitted final comments to CBP
- August 28 & 29: BMP Verification Review Panel met. Benham attended on behalf of subgroup

Background

- BMP verification is defined as
“the process through which agency partners ensure practices, treatments, and technologies resulting in reductions of nitrogen, phosphorus, and/or sediment pollutant loads are implemented and operating correctly.”
- The purpose of BMP verification is to
“...strengthen our [the public’s] confidence in local implementation efforts to ensure they are designed to help land owners, municipalities, and facility managers take the actions necessary to protect their properties, lands, riparian habitats, and local streams.”

Five Verification Principles

Practice Reporting Affirms that BMP verification is required to receive credit

Scientific Rigor Verification should assure effective implementation through scientifically rigorous and defensible, professionally established and accepted sampling, inspection and certification protocols.

Public Confidence Requires transparency in both the process of verification and tracking of underlying data.

Adaptive Management Recognizes that the verification process must evolve

Sector Equity Calls for equity in the measurement and functionality of BMPs across source sectors

“Given the lack of detail and the absence of specific examples of verification protocols in the July 15th draft BMP Verification Framework, the committee found it difficult to review and comment on the evaluation and oversight process.”

“As a result, the committee believed it necessary to provide an overarching [general] recommendation as to how BMP verification protocols should be developed and implemented.”

The general recommendations made by the STAC Verification Subgroup were consistent with those made by others.

General BMP Verification Recommendations

1. Measure not only numbers of BMPs, but also appropriate indicators/outcomes of BMP adoption.
2. Base BMP verification protocols on sound statistical sampling designs that consider, among other things, the objectives to be achieved, the populations being sampled, and the desired level of confidence/accuracy to be attributed to the data and conclusions drawn from the data.
3. Engage independent entities with appropriate expertise to design and implement BMP verification protocols.
4. Focus verification in areas and/or towards specific BMPs that have the most impact on water quality.
5. Decouple BMP verification from BMP accounting for input into the CBWM.

Summary Comments related to Ongoing Decision-Making Roles within the CBP Partnership

Section 12 in Draft BMP Verification Framework Documentation

- Much of the oversight structure and procedures appear to be focused on an initial review of the BMP verification process rather than an ongoing, robust, independently managed, and transparent procedure by which the verification protocols [plans and procedures] are designed and implemented, and periodically, if not continually, reviewed and revised.
- The BMP verification process should not focus on documenting the BMP verification paper trail, but rather on verifying actual observations that BMPs exist and are functioning.
- Develop a process/flow chart that clearly defines the BMP verification oversight and evaluation process. Include the roles and responsibilities of all parties involved in BMP verification oversight and evaluation, critical activities and timelines, and data/documentation requirements.