

Chesapeake Bay Program Partnership's Jurisdictional BMP Verification Program Evaluation Form

Purpose

This Chesapeake Bay Program Partnership's Jurisdictional BMP Verification Evaluation Form will be completed by the members of the Partnership's BMP Verification Review Panel. This is the final element of their original charge given to the Panel back in September 2012. The Panel was formed to provide feedback and recommendations to the Chesapeake Bay Program Partnership. This form is not intended to represent official approval of any jurisdictional program, but will be used as a tool to help inform the evaluation by EPA of proposed state and jurisdictional programs.

Evaluation Form Design

Sector Focus

The evaluation form is designed to focus on how each jurisdiction has proposed to address verification of the six sectors—agriculture, forestry, stormwater, wastewater, wetlands and streams. For each sector, the Panel members will review each jurisdiction's approach to the key elements¹ within each sector's BMP verification guidance or whether any proposed alternative approaches have been sufficiently documented and meet verification goals. Emphasis is placed on the degree to which each jurisdiction followed the Partnership's BMP Verification Principles. A more comprehensive review of proposed statistical sampling methods as a way in which to address BMP verification will be conducted by a statistical survey design review group formed under a cooperative agreement with Virginia Tech. The statistical design review will take place in collaboration with Panel members, but was generally not considered as part of this Evaluation Form.

Program-wide Focus

The evaluation form also asks the Panel members advice as to whether the jurisdiction's overall BMP verification program achieves the five BMP verification principles. If Panel members feel that programs require modifications to achieve, or to be consistent with the principles, panel members are asked to provide specific recommendations for improvement.

Verification Principles

The Chesapeake Bay Program partnership defined and adopted five principles to guide partners' efforts as they build on existing local, state and federal practice tracking and reporting systems and make enhancements to their verification program. The five principles are summarized in Table 1 and should be considered the standard for acceptance throughout the Panel's evaluation of the jurisdictions' proposed BMP Verification Programs Plans.

¹ The key elements were identified by each of the Partnership's six sector workgroup coordinators.

Table 1. Summary of BMP Verification Principles.

Practice Reporting:

BMP Verification is required for practices, treatments and technologies reported for nitrogen, phosphorus and/or sediment pollutant load reduction credit through the Bay Program. Verification protocols may reflect different tools and timelines for measurement where appropriate (i.e. permits, statistical sampling, etc.) and will ensure that under normal operating conditions:

- 1) Structural practices are properly designed, installed, and functioning;
- 2) Practices meet the CBP Partnership's implementation and management definitions;
- 3) Practices are consistent with or functionally equivalent to established practice definitions and/or standards;
- 4) Practices are not double counted;
- 5) Practices are currently functional at the time of seeking credit.

Scientific Rigor:

BMP verification should assure effective implementation through scientifically rigorous and defensible, professionally established and accepted sampling, inspection and certification protocols, regardless of the funding source. Allows for varying methods of data collection that balances scientific rigor with cost-effectiveness and the significance of or priority placed upon the practice in achieving pollution reduction.

Public Confidence:

BMP verification protocols should incorporate transparency in both the processes of verification and tracking and reporting of the underlying data. Levels of transparency will vary depending on the source sector. Acknowledges existing legal limitations and the need to respect individual confidentiality to ensure access to non-cost shared practice data.

Adaptive Management:

Verification protocols will recognize existing funding and allow for reasonable levels of flexibility in the allocation or targeting of those funds. Funding shortfalls and process improvements will be identified and acted upon when feasible.

Sector Equity:

Each jurisdiction's program should strive to achieve equity in the measurement of functionality and effectiveness of the implemented BMPs among and across the source sectors.

State:				
Sector: Agriculture				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Will agriculture BMPs be identified and verified according to the recommended verification categories (Visual Assessment-Single Year, Visual Assessment-Multi-Year, and Non-Visual Assessment)?</i>		
Notes:				
		<i>Will agriculture BMPs be identified and verified according to oversight categories (non-cost shared, cost-shared, regulatory, and permitted)?</i>		
Notes:				
		<i>Does the program define the frequency of verification assessments for initial and subsequent years of implementation and reporting? (For priority BMPs, onsite visits are recommended for 10% of BMPs per year)</i>		
Notes:				

State:				
Sector: Agriculture				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>If an alternative strategy to sub-sampling is utilized than the strategy outlined in the sector guidance, is it properly identified and appropriately justified?</i>		
Notes:				
		<i>Does the program identify a process where BMP assessment methods would change with a change in BMP oversight (i.e. cost-shared contractual BMP to non-contractual BMP)?</i>		
Notes:				
		<i>Does the program identify the difference in sub-sampling for subsequent years for BMPs under a CAFO permit oversight? (I.e. 20% compared to 10/5%)</i>		
Notes:				

State:				
Sector: Agriculture				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Are the assessment methods utilized to verify BMPs based on type and category of oversight clearly explained and consistent with the sector guidance?</i>		
Notes:				
		<i>Does the program identify the level of verification effort in relation to TMDL sector nutrient and sediment reduction goals?</i>		
Notes:				
		<i>For on-site non-visual assessments of plans for Nutrient Management, does the program identify the assessment methods utilized to verify each component of the plans, the degree of compliance with the CBP-defined practice standards, and the ability to track and report data on compliance levels of each component or standard?</i>		
Notes:				

State:				
Sector: Agriculture				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Is the intensity of verification efforts prioritized in proportion to a practices contribution to the overall TMDL pollution reduction in the jurisdiction's WIP?</i>		
Notes:				
		<i>Does the program make an effort to increase the transparency of its BMP verification programs? If so, what steps have been proposed?</i>		
Notes:				
Notes:				

Overall Agriculture Evaluation

Did the jurisdiction appear to utilize the suggested approach provided by the Verification Panel in Table 8 of the BMP Verification Framework when developing their Verification Protocol for this sector? If not, does the proposed approach comply with the verification principles? If not, please explain.

For each key element, particularly those for which an alternative approach was proposed, did the jurisdiction provide a sufficient level of documentation, understandable by a wider, non-technical audience, to explain their approach? If not, please explain what's missing.

Please identify any alternative approaches that you feel are not consistent with the CBP Partnership's five Verification Principles. How might the jurisdiction improve those approaches to achieve a protocol that is consistent with the Principles?

Please explain any other comments you have on the jurisdiction's BMP Verification Protocol for this sector and any specific recommendations.

Agricultural Verification Program Plan Score (Please check one):

- Inadequate** in that it is inconsistent with Sector Guidance, alternative approaches inconsistent with BMP Verification Principles, or missing many key elements [Score of 1]
- Good** but some inconsistency with the Sector Guidance or is missing some key elements [Score of 3]
- Fully consistent** with the Sector Guidance or documents alternative approaches consistent with BMP Verification Principles [Score of 5]

State:				
Sector: Forestry				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Is the intensity of verification efforts prioritized in proportion to a practices contribution to the overall TMDL pollution reduction in the jurisdiction's WIP?</i>		
Notes:				
		<i>Do verification methods for cost-shared agricultural riparian buffers utilize and build upon the existing verification programs for cost-shared contracts?</i>		
Notes:				
		<i>Are the frequency of site-checks consistent with the following recommendation from the sector guidance: Two visits within the first 4 years, spot-checked between years 5-10, and spot checked between years 10-15 to determine contract continuation? If not, are they sufficient to ensure scientific rigor? Are CREP partners involved in the reenrollment process?</i>		
Notes:				

State:				
Sector: Forestry				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Do proposed site inspection methods focus on common maintenance issues specifically related to water quality standards such as channelization or concentrated flows?</i>		
Notes:				
		<i>Do statistical sampling methods document how they demonstrate a clear improvement over the current sampling rate? (The recommended rate is 80% confidence in reported practices)</i>		
Notes:				
		<i>Are the baseline acres for each practice tracked in order to ensure there is a net gain in acres across a county or watershed segment over time?</i>		
Notes:				

State:				
Sector: Forestry				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Are tree canopy and riparian buffer acres re-assessed every 5 years to ensure net gain in tree canopy acres and riparian buffer acres over time?</i>		
Notes:				
		<i>Does the program rely upon qualified local forestry partners for tracking, reporting, and maintenance for expanded tree canopy practices?</i>		
Notes:				
		<i>Do existing and planned forest harvesting inspection programs track total acres or rate of implementation of forest harvesting BMPs? Do they require site-visits to ensure proper installation?</i>		
Notes:				

Overall Forestry Evaluation

Did the jurisdiction appear to utilize the suggested approach provided by the Verification Panel in Table 8 of the BMP Verification Framework when developing their Verification Protocol for this sector? If not, does the proposed approach comply with the verification principles? If not, please explain.

For each key element, particularly those for which an alternative approach was proposed, did the jurisdiction provide a sufficient level of documentation, understandable by a wider, non-technical audience, to explain their approach? If not, please explain what's missing.

Please identify any alternative approaches that you feel are not consistent with the CBP Partnership's five Verification Principles. How might the jurisdiction improve those approaches to achieve a protocol that is consistent with the Principles?

Please explain any other comments you have on the jurisdiction's BMP Verification Protocol for this sector and any specific recommendations.

Forestry Verification Program Plan Score (Please check one):

- Inadequate** in that it is inconsistent with Sector Guidance, alternative approaches inconsistent with BMP Verification Principles, or missing many key elements [Score of 1]
- Good** but some inconsistency with the Sector Guidance or is missing some key elements [Score of 3]
- Fully consistent** with the Sector Guidance or documents alternative approaches consistent with BMP Verification Principles [Score of 5]

State:				
Sector: Stream Restoration				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Is a professionally appropriate checklist or other tool used to assess the design of the project and whether the project was installed according to the design?</i>		
Notes:				
		<i>Does the verification program seek to identify the key features that relate to stream function?</i>		
Notes:				
		<i>Is a professionally appropriate checklist or other tool used to assess post-construction performance?</i>		
Notes:				

State:				
Sector: Stream Restoration				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Is the frequency of field verification defined?</i>		
Notes:				
		<i>Are inspections required two years after the initial construction and once every five years after that?</i>		
Notes:				
		<i>Does the program require a post-construction certificate to ensure that the project was installed properly, meets its functional restoration objectives, and is hydraulically and vegetatively stable?</i>		
Notes:				

State:				
Sector: Stream Restoration				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>What is the defined amount of time a locality/federal facility has to take corrective maintenance or rehabilitation to bring a sub-standard BMP back into compliance?</i>		
Notes:				
		<i>Are separate procedures necessary, and if so, identified for verifying restoration projects built for the purpose of nutrient trading within a state or to offset new loads elsewhere in the watershed?</i>		
Notes:				
		<i>Is the program consistent with the Bay Program-approved reporting standards as far as reporting units, geographic location, and removal rates?</i>		
Notes:				

Overall Stream Restoration Evaluation

Did the jurisdiction appear to utilize the suggested approach provided by the Verification Panel in Table 8 of the BMP Verification Framework when developing their Verification Protocol for this sector? If not, does the proposed approach comply with the verification principles? If not, please explain.

For each key element, particularly those for which an alternative approach was proposed, did the jurisdiction provide a sufficient level of documentation, understandable by a wider, non-technical audience, to explain their approach? If not, please explain what's missing.

Please identify any alternative approaches that you feel are not consistent with the CBP Partnership's five Verification Principles. How might the jurisdiction improve those approaches to achieve a protocol that is consistent with the Principles?

Please explain any other comments you have with the jurisdiction's BMP Verification Protocol for this sector and any specific recommendations.

Stream Restoration Verification Program Plan Score (Please check one):

- Inadequate** in that it is inconsistent with Sector Guidance, alternative approaches inconsistent with BMP Verification Principles, or missing many key elements [Score of 1]
- Good** but some inconsistency with the Sector Guidance or is missing some key elements [Score of 3]
- Fully consistent** with the Sector Guidance or documents alternative approaches consistent with BMP Verification Principles [Score of 5]

State:				
Sector: Urban Stormwater (Regulated)				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Is the existing MS4 permit inspection and maintenance framework the foundation of the jurisdiction's program?</i>		
<i>Notes:</i>				
		<i>Is field performance verification scheduled for every other MS4 permit cycle? How often?</i>		
<i>Notes:</i>				
		<i>Does the program link the timing of visual inspections to the length of credit durations for urban stormwater practices?</i>		
<i>Notes:</i>				

<i>State:</i>				
<i>Sector: Urban Stormwater (Regulated)</i>				
<i>Was element addressed?</i>		<i>Key Element</i>	<i>Was alternative approach taken that was consistent with the Verification Principles?</i>	
<i>Yes (pg. #)</i>	<i>No</i>		<i>Yes (pg. #)</i>	<i>No</i>
		<i>Will MS4 communities be assessing their entire BMP populations within two permit cycles? If so, will they address pre-2000 BMPs prior to pre-1990 BMPs?</i>		
<i>Notes:</i>				
		<i>What is the defined amount of time a locality/federal facility has to take corrective maintenance or rehabilitation to bring a sub-standard BMP back into compliance?</i>		
<i>Notes:</i>				
		<i>Does the program address proper installation, whether or not the practice meets the design standards, and whether it functions in the hydrologic manner in which it was designed prior to submitting the BMP for credit?</i>		
<i>Notes:</i>				

State:				
Sector: Urban Stormwater (Regulated)				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Is the program consistent with the Bay Program-approved reporting standards? Do they allow appropriate flexibility for practices that don't lend themselves to the NEIEN geographic reporting requirements?</i>		
Notes:				
		<i>Are verification efforts prioritized according to a practice's contribution to the overall TMDL pollutant reduction in a state's urban source sector?</i>		
Notes:				
		<i>Will the jurisdiction provide spot checks on a subset of local and federal facility BMP project files to validate the reported BMP data?</i>		
Notes:				

State:				
Sector: Urban Stormwater (Semi-Regulated)²				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Does the program address semi-regulated communities by following one of the three options provided in the sector guidance?</i>		
Notes:				
		<i>Are the fastest-growing semi-regulated communities prioritized?</i>		
Notes:				
Notes:				

² Semi-Regulated BMPs, as defined in the Urban Stormwater Sector Guidance, refers to any BMP that is installed locally under a state construction general permit (CGP) outside of a MS4 community. While the permit applicant must sign an agreement that they will maintain the BMP, the locality is not required to have an inspection program to enforce maintenance, and the state may not have sufficient staff resources to do so on their behalf.

Overall Urban Stormwater Evaluation

Did the jurisdiction appear to utilize the suggested approach provided by the Verification Panel in Table 8 of the BMP Verification Framework when developing their Verification Protocol for this sector? If not, does the proposed approach comply with the verification principles? If not, please explain.

For each key element, particularly those for which an alternative approach was proposed, did the jurisdiction provide a sufficient level of documentation, understandable by a wider, non-technical audience, to explain their approach? If not, please explain what's missing.

Please identify any alternative approaches that you feel are not consistent with the CBP Partnership's five Verification Principles. How might the jurisdiction improve those approaches to achieve a protocol that is consistent with the Principles?

Please explain any other comments you have on the jurisdiction's BMP Verification Protocol for this sector and any specific recommendations.

Urban Stormwater Verification Program Plan Score (Please check one):

- Inadequate*** in that it is inconsistent with Sector Guidance, alternative approaches inconsistent with BMP Verification Principles, or missing many key elements [Score of 1]
- Good*** but some inconsistency with the Sector Guidance or is missing some key elements [Score of 3]
- Fully consistent*** with the Sector Guidance or documents alternative approaches consistent with BMP Verification Principles [Score of 5]

<i>State:</i>				
<i>Sector: Wastewater</i>				
<i>Was element addressed?</i>		<i>Key Element</i>	<i>Was alternative approach taken that was consistent with the Verification Principles?</i>	
<i>Yes (pg. #)</i>	<i>No</i>		<i>Yes (pg. #)</i>	<i>No</i>
		<i>Does program require significant wastewater treatment facilities to monitor and report monthly flows and loads via DMRs?</i>		
<i>Notes:</i>				
		<i>Does program require significant facilities to submit annual loading reports where trading or general permit conditions apply to a facility and when annual WIP reporting applies?</i>		
<i>Notes:</i>				
		<i>For non-significant wastewater treatment facilities, will NPDES DMR be used to report load reductions from BMPs (i.e. upgrades and offsets of new or expanding facilities)?</i>		
<i>Notes:</i>				

State:				
Sector: Wastewater				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Will non-significant facilities be tracked against aggregate waste-load allocations with loads reported annually via the mechanisms documented in the jurisdiction's WIPs?</i>		
Notes:				
		<i>Will Combined Sewer Overflows (CSOs) undergo construction verification to ensure proper design, installation and maintenance?</i>		
Notes:				
		<i>Are plans in place to ensure that CSOs receive sufficient post-construction monitoring and inspection, and that they are being properly tracked and reported?</i>		
Notes:				

<i>State:</i>				
<i>Sector: Wastewater</i>				
<i>Was element addressed?</i>		<i>Key Element</i>	<i>Was alternative approach taken that was consistent with the Verification Principles?</i>	
<i>Yes (pg. #)</i>	<i>No</i>		<i>Yes (pg. #)</i>	<i>No</i>
		<i>Are Onsite treatment system verification procedures based on existing state regulations <u>or</u> do they follow the set of minimum elements for verification based on existing state programs in Delaware (DE), Maryland (MD) and Virginia (VA)?</i>		
<i>Notes:</i>				
		<i>Are proper checks in place to ensure the design and installation on-site BMP systems will be done and reported by certified service providers and verified in the permitting processes?</i>		
<i>Notes:</i>				
		<i>Is the frequency of maintenance and inspection of onsite systems annual, or otherwise consistent with the recommendations from Table B-17 of the Onsite Wastewater Treatment Expert Panel report?</i>		
<i>Notes:</i>				

Overall Wastewater Evaluation

Did the jurisdiction appear to utilize the suggested approach provided by the Verification Panel in Table 8 of the BMP Verification Framework when developing their Verification Protocol for this sector? If not, does the proposed approach comply with the verification principles? If not, please explain.

For each key element, particularly those for which an alternative approach was proposed, did the jurisdiction provide a sufficient level of documentation understandable by a wider, non-technical audience, to explain their approach? If not, please explain what's missing.

Please identify any alternative approaches that you feel are not consistent with the CBP Partnership's five Verification Principles. How might the jurisdiction improve those approaches to achieve a protocol that is consistent with the Principles?

Please explain any other comments you have on the jurisdiction's BMP Verification Protocol for this sector and any specific recommendations for addressing each concern.

Wastewater Verification Program Plan Score (Please check one):

- Inadequate*** in that it is inconsistent with Sector Guidance, alternative approaches inconsistent with BMP Verification Principles, or missing many key elements [Score of 1]
- Good*** but some inconsistency with the Sector Guidance or is missing some key elements [Score of 3]
- Fully consistent*** with the Sector Guidance or documents alternative approaches consistent with BMP Verification Principles [Score of 5]

<i>State:</i>				
<i>Sector: Wetlands</i>				
<i>Was element addressed?</i>		<i>Key Element</i>	<i>Was alternative approach taken that was consistent with the Verification Principles?</i>	
<i>Yes (pg. #)</i>	<i>No</i>		<i>Yes (pg. #)</i>	<i>No</i>
		<i>Were a combination of site assessments and groundwater flow equations used to determine the changes in surface ponding?</i>		
<i>Notes:</i>				
		<i>Were remote sensing technologies used to determine the area of effect?</i>		
<i>Notes:</i>				
		<i>For rehabilitation projects, were hydraulic models of stream flow used in combination with topographic data to determine the area of effect? Was validation completed through site visits during storm flow?</i>		
<i>Notes:</i>				

<i>State:</i>				
<i>Sector: Wetlands</i>				
<i>Was element addressed?</i>		<i>Key Element</i>	<i>Was alternative approach taken that was consistent with the Verification Principles?</i>	
<i>Yes (pg. #)</i>	<i>No</i>		<i>Yes (pg. #)</i>	<i>No</i>
		<i>Were appropriate field indicators used to check for periodic soil saturation or inundation? Does the program use the suggested checklist for field verification?</i>		
<i>Notes:</i>				
		<i>Are post-construction site visits mentioned and do they check for the following: predominance of native wetland vegetation; was the project completed as designed; that the hydrology is as planned; and that structures are operating properly?</i>		
<i>Notes:</i>				
		<i>Will the installing agency provide a post-construction certification?</i>		
<i>Notes:</i>				

State:				
Sector: Wetlands				
Was element addressed?		Key Element	Was alternative approach taken that was consistent with the Verification Principles?	
Yes (pg. #)	No		Yes (pg. #)	No
		<i>Does the verification program use the monitoring requirements for financial assistance programs? Which ones?</i>		
Notes:				
		<i>Will a project file be maintained by the installing agency for each restoration project installed?</i>		
Notes:				
		<i>Is onsite monitoring required within three years following construction? Is aerial imagery used for remote observation of long-term monitoring of wetland BMPs?</i>		
Notes:				

Overall Wetlands Evaluation

Did the jurisdiction appear to utilize the suggested approach provided by the Verification Panel in Table 8 of the BMP Verification Framework when developing their Verification Protocol for this sector? If not, does the proposed approach comply with the verification principles? If not, please explain.

For each key element, particularly those for which an alternative approach was proposed,, did the jurisdiction provide a sufficient level of documentation, understandable by a wider, non-technical audience, to explain their approach? If not, please explain what's missing.

Please identify any alternative approaches that you feel are not consistent with the CBP Partnership's five Verification Principles. How might the jurisdiction improve those approaches to achieve a protocol that is consistent with the Principles?

Please explain any other comments you have on the jurisdiction's BMP Verification Protocol for this sector and any specific recommendations.

Wetlands Verification Program Plan Score (Please check one):

- Inadequate*** in that it is inconsistent with Sector Guidance, alternative approaches inconsistent with BMP Verification Principles, or missing many key elements [Score of 1]
- Good*** but some inconsistency with the Sector Guidance or is missing some key elements [Score of 3]
- Fully consistent*** with the Sector Guidance or documents alternative approaches consistent with BMP Verification Principles [Score of 5]

Overall Evaluation of the Jurisdiction’s BMP Verification Program

Achievement of BMP Verification Principles

Does the jurisdiction’s overall proposed BMP verification program sufficiently address the following five BMP Verification Principles? If the answer is no, please provide specific recommendations for what could be added or enhanced that would enable the jurisdiction to propose a verification program consistent with the Partnership’s BMP Verification Principles.

Jurisdiction:		
Principle	Achieved	Not Achieved
<i>Practice Reporting</i>		
Comments/Recommendations:		
<i>Scientific Rigor</i>		
Comments/Recommendations:		
<i>Public Confidence</i>		
Comments/Recommendations:		
<i>Adaptive Management</i>		
Comments/Recommendations:		
<i>Sector Equity</i>		
Comments/Recommendations:		

Missing Elements

Does the jurisdiction’s own checklist indicate any key elements are missing from their proposed BMP verification program? If so, do you consider these missing elements to be a fatal flaw in their BMP verification program and why?

Overall Jurisdictional BMP Verification Program Score (Please check one):

- Inadequate*** in that it is inconsistent with many of the BMP Verification Principles or missing many key elements in the checklist [Score of 1]
- Good*** but some inconsistency with the BMP Verification Principles or is missing some key elements in the checklist [Score of 3]
- Fully consistent*** with the BMP Verification Principles and includes most/all of the key elements in the checklist [Score of 5]

Summary of Scores

Agriculture	_____
Forestry	_____
Stream Restoration	_____
Urban Stormwater	_____
Wastewater	_____
Wetlands	_____
Overall Verification Program	_____

Final Comments

Please provide any further comments or recommendations that have not previously been captured in your evaluation.