

## Chesapeake Bay Program (CBP) partnership Water Quality Goal Implementation Team (WQGIT) recommendation to the Management Board

**Recommendation:** State and federal agencies will be held accountable to their short-term (i.e., 2-year) numeric goals through a biennial evaluation of progress compared to the straight-line trajectory of necessary reductions to the 2025 Phase III planning targets or federal agency planning goals. If a state or federal agency so chooses, numeric 2-year milestones could be developed for the purpose of following an alternative (i.e., non-straight-line) trajectory to 2025. See [Figure 7-1](#) of the TMDL document. Using this approach, the expectation for states and federal agencies to develop **numeric** 2-year milestones under the Chesapeake Bay Total Maximum Daily Load (TMDL) Accountability Framework could be eliminated. The expectation to develop programmatic milestones will remain. Sector-scale numeric progress information will continue to be made available by the CBP partnership.

Pros	Cons
<ul style="list-style-type: none"> <li>• Programmatic (not numeric) milestones are the significant driver for state implementation planning</li> <li>• The annual progress evaluation is a better data source for planning for the next 2-year cycle and measuring the pace of short-term progress</li> <li>• Most states do not control what Best Management Practices (BMPs) are installed--local entities (e.g., counties or private property owners) ultimately decide. Therefore, states can only make an estimate of what local entities will do, sometimes making this effort a paperwork exercise to meet a target, producing a false sense of certainty or accountability. <ul style="list-style-type: none"> <li>○ Smaller states do have more control over BMP implementation.</li> <li>○ Local entities are not required to develop 2-year plans.</li> </ul> </li> <li>• Out-year budgets for states/federal agencies are not known when numeric milestones are developed, further contributing to uncertainty in implementation forecasts.</li> <li>• Reduces milestone development and evaluation time and effort</li> <li>• Minimizes confusion of having another set of goals besides the 2025 Phase III WIP planning targets</li> </ul>	<ul style="list-style-type: none"> <li>• Perception of a lack of short-term accountability or commitment to demonstrate remaining on pace to achieve the 2025 goals</li> <li>• Communication challenge since the new framework for demonstrating accountability and attainment of short-term goals differs from the <a href="#">2008 Executive Council commitment</a> and subsequent <a href="#">WQGIT Management Strategy</a> and <a href="#">2-year workplan</a> which anticipated both numeric and programmatic 2-year milestone development</li> <li>• Two-year numeric commitments allow flexibility in proposing short-term changes in implementation since states may not expect progress to be even year-to-year.</li> <li>• Numeric BMP commitments are one way to quantitatively track progress toward the achievement of programmatic milestones</li> <li>• Numeric BMP commitments provide the needed level of accountability to ensure progress is continued</li> <li>• Understanding how each pollution source sector is progressing is critical to achieving and maintaining the pollution caps. While estimates of pollution loads by sector will provide some insight, even more detailed information is garnered from assessing BMP goals. By assessing progress, or lack thereof, toward BMP implementation, jurisdictions have the</li> </ul>

Pros	Cons
<ul style="list-style-type: none"> <li>• Eliminates confusion related to differing time frames (i.e., numeric milestones are on a July 1-June 30 schedule and programmatic are on a January 1-December 31 timeframe)</li> <li>• States have other internal mechanisms for setting goals (e.g., MD has a financial assurance planning program for their MS4s).</li> <li>• Consistent with the Federal Executive Order strategy, which only requires programmatic milestones from the Federal Partners</li> <li>• Should not impact development of programmatic commitments by federal agencies</li> </ul>	<p>information needed to adaptively manage and make up for shortfalls by accelerating implementation of other practices.</p> <ul style="list-style-type: none"> <li>• Numeric BMP goals are not affected by updates to the Chesapeake Bay Watershed Model and, as such, estimates of progress will not be affected by changes to the model</li> </ul>

- Decision on numeric milestones to address climate change reductions post-2022 will be handled separately
- Decision on numeric milestones for Conowingo will be handled separately through the PSC and its Conowingo WIP Steering Committee