

*The following PDF is a copy of Peter Claggett's update email shared with the FFWG on June 25th, 2025. The email provided an update to the June 10th FFWG meeting discussion on tracking and crediting unassigned federal land uses/BMP types in CAST for Phase 7.*

*Please note, this is an updated version of the original email with a few corrections and clarifications for "harvested forest".*

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Dear FFWG members,

During the June 10th FFWG meeting, I suggested that it might be possible to treat "harvested forest" and "construction" land uses on federal lands similarly to how cropland and pasture are currently treated- shifting those acres to the states while allowing federal agencies to share BMP information with the states for reporting purposes. After further internal discussions with the CAST modeling team and EPA-CPBO leadership, however, it was decided that this option would be onerous and challenging to implement, not achieve appreciable benefits because not all agencies and facilities would opt to comply, and would likely prove unacceptable to the states. Moreover, unlike cropland and pasture land uses, timber harvest or construction activities are ephemeral land uses meaning that the acreages vary through time. Federal land areas must be held constant over time in Phase 7, similar to how jurisdictional boundaries must be respected. This would not be possible if harvest and construction acres are virtually shifted from federal ownership to state ownership.

For the August 12th FFWG meeting, we anticipated to vote on whether to cease discussions on this topic (and maintain the status quo reporting methods) or to change reporting methods. **Given the above information, however, the CAST team recommends that we maintain the status quo and not bother with a vote.** Here are the status quo reporting methods for the following land uses/BMP types under review (please review the [issue paper](#) for more context):

- **Septic** - Loads from onsite septic systems on federal facilities are absent from the CBP watershed model and federal agencies are not credited for their actions to reduce these loads. If a federal agency implements BMPs on the land, it will only be tracked if the federal facility reports that information to the state for their annual BMP reporting. That credit is then attributed to the state and not to the federal agency.
- **Construction** - Loads from construction activities requiring E&S permits on federal facilities are absent from the CBP watershed model and federal agencies are not credited for BMP practices despite the BMP practices being tracked.

- **Harvested Forest** - Loads from harvested forest on federal lands are absent from the CBP watershed model and federal agencies are not credited for these practices despite them being tracked.
- **Agriculture (Cropland and Pasture/Hay)** - Loads and acres from agricultural lands on federal facilities are shifted to the responsibility of the states in which they reside within the CBP watershed model. If a federal agency implements BMPs on the land, it will only be tracked if the federal facility reports that information to the state for their annual BMP reporting. That credit is then attributed to the state and not to the federal agency.

Regarding the summary of land use acres by federal facility polygons, while initiating that work it was found that the federal facilities data layer included duplicate and overlapping polygons and required cleaning before land use summaries could be produced. That process is still ongoing. A final federal facilities data layer will be updated on the [federal facilities web viewer](#). You will be notified once the data are updated so you can review it ahead of the August 12th FFWG meeting, during which we will vote to approve the final federal facilities data layer.

If you have any concerns or questions about this recommendation, please contact Peter Claggett ([pclagget@chesapeakebay.net](mailto:pclagget@chesapeakebay.net)) or Marilyn Yang ([myang@chesapeakebay.net](mailto:myang@chesapeakebay.net)).

Sincerely,

Peter

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