

Proposed Approach for Setting Federal Facility Targets

Background:

- Following EPA's evaluation of the 2012-2013 two-year milestones, the Chesapeake Bay Program's (CBP) Management Board requested that the Chesapeake Bay Program Office explore options for improving federal facilities' best management practice (BMP) progress reporting, including the use of federal targets to quantify expected load reductions from federal facilities.
- The Management Board requested a concept proposal for consideration at the November 13 Management Board meeting and the December Principals' Staff Committee meeting. This version incorporates comments received on an October 21 Water Quality GIT call.
- For the Phase 6 Watershed Model and the Phase 3 Watershed Implementation Plans (WIPs) in 2018, there will be a new federal lands overlay for use with the land use classifications which will help to identify the acres and loads associated with federal facilities.
- Between now and the end of 2017, EPA is proposing the following approach for setting federal facility targets using the new BayFAST tool to assist with this process. Note that BMP scenarios assessed using BayFAST will not exactly match Chesapeake Bay Program Watershed Model outputs and Chesapeake Bay TMDL allocations, however, taking this approach will move the Partnership forward now and enable any needed refinements to be made in 2018 when the jurisdictions develop their Phase 3 WIPs.

Proposed Approach:

1. **EPA requested the Federal Leadership Committee (FLC) to endorse** this approach to setting of federal facility targets at the October 28, 2014 FLC meeting and to direct their respective agency facility managers to work with the jurisdictions on meeting the pollution reduction targets set for their facilities. *(NOTE: EPA presented this proposal at the 10/28/14 FLC meeting and DOD and DHS officials expressed some concerns about not having more details on how this approach would work. DOD plans to provide written comments on this proposal to the WQGIT and plans to participate on the team developing a more detailed protocol as described under Next Steps below).*
2. **CBP provides the jurisdictions with a comprehensive list of federal facilities/lands** in their respective jurisdiction.
3. **Jurisdictions identify a list of "Priority Federal Facilities"**¹ based on their own criteria (e.g., VA list is top 75 facilities that constitute ~90% of the nutrient and sediment loads from federal facilities/lands in their state).² States with a limited number of federal facilities/lands in the Bay watershed may choose not to create a priority list. In such cases, EPA still expects the states to set clear expectations for pollutant load reductions at federal facilities within their respective jurisdictions.
4. **Jurisdictions contact each of the "Priority Federal Facilities"** informing them of their plans to provide them with N, P and S reduction targets for 2017 with interim reporting for 2015 and 2016 that demonstrates progress toward the 2017 target and 2025 goal.

¹ This approach can also apply to smaller, lower priority facilities.

² Jurisdictions may propose an alternative approach so long as they develop and provide documentation of their approach for federal targets.

5. **Jurisdictions request facilities to use BayFAST to update land use information** for their facilities and provide that information to the jurisdiction.³
6. **Upon receipt of the facilities' land use data, jurisdictions determine appropriate 2017 targets and 2025 goals** based on the state-basin in which the facility is located (e.g., Virginia Potomac) and provide those targets in writing to each priority federal facility. Targets could be based on per acre loading rates or percent reductions specific to each land use in each state-basin. Jurisdictions also will provide the facilities a description of the methodology used for setting their targets.
7. **EPA Regional Administrator sends letters to federal agencies' Federal Leadership Committee (FLC) members** (or equivalent) informing them of their agency's facilities in each of the Bay jurisdictions that have received facility-specific targets and stating EPA's expectation for meeting the targets. EPA also expects FLC members to communicate these targets directly to each of their facility managers.
8. **Federal facilities use BayFAST to create BMP scenarios to meet those targets**, using those scenario results to inform their future development of two-year milestones. Federal facilities will report BMP implementation progress towards these facility-specific targets to the jurisdictions annually on October 1 using the spreadsheet templates for inclusion into each jurisdiction's annual progress run data submission.
9. **Federal agencies are to undertake BMP verification** following the Basinwide BMP Verification Framework approved and adopted in September 2014 by the Principals' Staff Committee. As part of this framework, federal facilities should also conduct an inventory of historic BMPs implemented on their facilities, installations, and lands so they get credit for nutrient and sediment pollutant load reduction practices they have already put in place.
10. **Jurisdictions incorporate federal facility progress data into annual progress runs submitted through the National Environmental Information Exchange Network (NEIEN) to calculate load reductions.** EPA evaluates federal facilities' progress and milestone commitments as part of its annual oversight.

EPA will assist the jurisdictions in this effort by working with the FLC, FOD and Federal Facilities Team to inform them of this process and get needed, top-level support from federal agency management. EPA also provides contract support for any changes needed to BayFAST, CAST, MAST, VAST tools and offers additional BayFAST training to federal agencies and jurisdictions.

Progress and Next Steps:

- On their November 10 call, the Water Quality Goal Team approved moving the concept proposal forward to the Management Board and decided that a small team of jurisdiction and federal agency representatives would be formed to develop a more detailed protocol for implementing this approach. On November 13, the Management Board approved the proposed and forward to the Principals Staff Committee for approval at their December 10 meeting.
- Jurisdictions and federal agencies will be requested to identify a representative to work on the team to develop the protocol.
- The protocol would be developed following approval of this proposed approach by the Principals Staff Committee.

³ Note that this update would be in addition to updates that federal facilities are providing to the Federal Facilities Editor Tool for the Phase 6 Watershed Model data inputs.