Milestone Discussion Topics Raised by Jurisdictions

"Land Use"

Background: Milestone input decks, when developed, are run using 2010 land use, animal and septic numbers. The decision to use 2010 land use/animal/septic numbers maintains consistency to compare "apples to apples" across the TMDL: 2009 baseline, 2-year milestones, 2017 interim target and 2025 target projections. When annual progress runs are processed they are run using a projected land use (including animals and septic) for that year. The projected land use accounts for potential growth and changes in land use, animal numbers and septics between 2010 and the progress run year. When the 2012-2013 milestones were developed and modeled they were run using 2010 land use numbers. Progress runs are used to assess interim and final loads as a result of implementation and are run on a projected land use. Therefore EPA will not be comparing "apples to apples" in our evaluation of the implementation progress compared to the milestone load commitments. This issue was raised both by MD and VA.

- EPA needs to maintain using consistent land use for the 2009 baseline, milestones, 2017 and 2025 to compare target projections.
- For 2012-2013 milestones, EPA will maintain the milestones planning targets with 2010 land use/animal/septic numbers and will determine progress using projected land use/animal/septic numbers for each progress run year.
- ***Proposed recommendation for 2012-2013***: In addition, EPA will run the progress runs using the 2010 land use/animal/septic numbers in order to maintain an "apples to apples" comparison for milestone progress. This will be done at the time of each progress run. By showing this comparison it will help jurisdictions to gauge the impact/changes as a result of the two land use/animal/septic numbers.
- ***Proposed question for future years***: Does the Milestone Workgroup want to pursue changing the "land use" for developing future milestones from using 2010 to using the projected land use?
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Timing of Milestones

Background: One of the areas of concern with the milestone framework is the timing. In a cyclical planning process it is desirable to evaluate your progress before refining your plan. The cycle is: plan, implement, evaluate, and repeat. With the current schedule, annual reporting and progress evaluation is not complete until March, but the final milestones are due in January.

- There cannot be "dead time" where there are periods where there is no milestone in place.
- Jurisdictions requested at the development of the Milestone Guide to maintain current reporting dates and not add additional reporting requirements.

- EPA allowed for adaptive management where jurisdictions modified their 2012-2013 milestone input decks after the 2012 progress run data was available. Jurisdictions are able to modify their input decks as they desire.
- EPA does offer jurisdictions the ability to provide progress run data prior to December 31, which would allow jurisdictions to have that information sooner in order to develop the next round of milestone input decks.
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Reporting Format

<u>Background</u>: Progress for BMP implementation will be submitted using NEIEN and the spreadsheet for wastewater. The programmatic milestones are in a Word document format with a column to provide an annual status update. The "2-pager" documents are developed for the purposes of public consumption and highlighting key milestone targets in for the EC meeting.

- Are folks happy with the 2012-2013 milestone summary document format to use in 2013? Is that an effective format for communicating progress for numeric and programmatic milestone accomplishments each year?
- Are folks happy with the Word document format for the programmatic milestones? Last year we had discussed the possibility of exploring the use of BayTAS to submit and report progress for programmatic milestones. Is that a subject the workgroup would like to revisit?