

Chesapeake Bay Program (CBP) partnership Milestone Workgroup's recommendation to the Water Quality Goal Implementation Team (WQGIT)

Recommendation: Eliminate the expectation for states and federal agencies to develop **numeric** 2-year milestones under the Chesapeake Bay Total Maximum Daily Load (TMDL) Accountability Framework. Instead, state and federal agencies will be held accountable to their short-term 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.

Pros	Cons
<ul style="list-style-type: none"> • Programmatic (not numeric) milestones are the significant driver for state implementation planning • 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 • 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"> ○ Smaller states do have more control over BMP implementation. ○ Local entities are not required to develop 2-year plans. • Out-year budgets for states/federal agencies are not known when numeric milestones are developed, further contributing to uncertainty in implementation forecasts. • Reduces milestone development and evaluation time and effort • Minimizes confusion of having another set of goals besides the 2025 Phase III WIP planning targets • 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) • States have other internal mechanisms for setting goals (e.g., MD has a financial assurance planning program for their MS4s). • Consistent with the Federal Executive Order strategy, which only requires programmatic milestones from the Federal Partners • Should not impact development of programmatic commitments by federal agencies 	<ul style="list-style-type: none"> • Perception of a lack of short-term accountability or commitment to demonstrate remaining on pace to achieve the 2025 goals • Communication challenge since the new framework for demonstrating accountability and attainment of short-term goals differs from the 2008 Executive Council commitment and subsequent WQGIT Management Strategy and 2-year workplan which anticipated both numeric and programmatic 2-year milestone development • 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.

- 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