

**Water Quality Goal Implementation Team
Federal Facilities Workgroup
Meeting Minutes**

Date: August 12th, 2025

Time: 10 am – 12 noon

[Meeting Materials](#)



Chesapeake Bay Program

Science. Restoration. Partnership.

Time	Agenda Item (Discussion Lead) and Desired Outcome	Materials, Notes, and Action Items
10:00 – 10:10	<p>I. Welcome, Introductions, Announcements – Auston Smith (US EPA CBPO)</p> <ul style="list-style-type: none"> For roll call purposes, please enter your name & affiliation into the chat. Call-in participants are requested to identify themselves verbally. Staffer update: Marilyn Yang is departing from the Bay Program to start her masters and Caroline Kleis (kleis.caroline@epa.gov) will assume the staffer role for the FFWG. 	<p>ACTION: Please accept the new FFWG meeting invitation from Caroline Kleis (kleis.caroline@epa.gov) that was emailed to the FFWG on 8/26/25.</p>
10:10 – 10:30	<p>II. Call a Vote to Finalize the Federal Boundaries Data Layer for Phase 7 – Coral Howe (USGS), Sophie Waterman (USGS), and Auston Smith (US EPA CBPO)</p> <p>Following months of data requests and review, the final draft federal facilities data layer was shared to the FFWG for review on 07/29/2025. Thank you to all the agencies for participating in this process!</p> <p>DECISIONAL ITEM: Auston Smith will call a vote to finalize and approve the updated federal facilities data layer for the Phase 7 Model.</p>	<p>Materials:</p> <ul style="list-style-type: none"> Federal Facilities Review Viewer <p>The FFWG voting members were asked to vote on whether to approve the updated federal facilities data layer for the Phase 7 Watershed Model using the consensus continuum (1 = Stop, 2 = Hold, 3 = Stand Aside, 4 = Agree, with reservations, 5 = Endorse). The recorded votes are as follows:</p> <p>Kaylyn Gootman (EPA): 3</p> <p>Kevin Du Bois (DoD): 4</p> <p>Liz Dawson (FWS): 4</p> <p>Karl Wilson (USDA): 4</p> <p>Jason Rinker (USACE): 4</p> <p>Katie Brownson (USFS): 4</p> <p>Rene Senos (NPS): 4</p> <p>DECISION: The FFWG voted to approve the updated federal facilities data layer for the Phase 7 Watershed Model.</p>

		Huge thank you to Coral Howe, Sophie Waterman, John Wolf, and the federal agencies for their time and effort to accomplish this data call and successful update of the federal boundaries data layer!
10:30 – 10:45	III. Update on CAST Baseline Year for Establishing Fixed Acreage Estimates for Federal Lands and Update on Procedure for Removing Cropland and Pasture from Federal Lands – Peter Claggett (USGS)	<p>Materials:</p> <ul style="list-style-type: none"> • Federal Facility Estimates (Phase 7) Presentation <p>Peter explained that with the updated federal facilities data layer now approved, the next step is to bring the land use information from those footprints into CAST. For federal land uses—specifically construction, harvested forest, and agriculture (cropland/pasture and hay)—these will be handled differently.</p> <p>For construction and harvested forest, since the CBP still maps these on federal lands, they need to determine how to classify these within the federal facility footprint. Peter proposed reclassifying these areas as compacted pervious, a land use type with relatively low pollutant loading—second only to forests and wetlands. However, agriculture (cropland and pasture/hay) must be removed entirely from the federal footprint and reassigned to the state.</p> <p>What complicates this process is that CAST uses land use data across multiple time periods. High-resolution data is collected for three points in time and then backcast to 1985 to support the hydrology model, which is calibrated to the 1990s. From 2022 onward, the CBP forecasts land use, focusing mainly on urbanization and how much forest and farmland are lost as a result of that. However, federal lands are held constant in these forecasts because the usual drivers of change, such as population and employment growth, don't apply in the same way. Federal land use will only be updated again when new high-resolution data becomes available, expected around 2027–2028.</p> <p>Because land use changes over time in the backcast period, it's possible that more or less agriculture may appear on federal land in earlier years, requiring rules to determine how to adjust the federal footprint accordingly. It's also necessary to decide the specific point in time when the agricultural footprint is subtracted from federal lands.</p> <p>With 2022 established by the CAST team as the base year, Peter proposed that any agriculture present on federal land as of 2022 be moved to state responsibility while construction and harvested forest could remain, but be reclassified as “compacted pervious”. If there are tidal wetlands present—uncommon for most facilities but relevant for places like Aberdeen Proving Grounds—they would be permanently removed from CAST and handled in the main Bay model, since the Watershed Model and CAST do not</p>

	<p>simulate tidal wetlands.</p> <p>After these reassignments, they must determine which land use acres remain within the federal footprint (excluding agriculture and tidal wetlands) and keep those acres constant from 1985 into the future. To manage changes over time, rules are needed for different scenarios. For example, if more agriculture is found in earlier years than in 2022, it will be reclassified as compacted pervious. If less is found, the missing acres will be proportionally subtracted from forest or compacted pervious categories. The same logic applies to tidal wetlands, which may be adjusted to maintain constant acreage totals over time.</p> <p>Peter concluded by emphasizing that this rule-based approach provides a consistent and practical method for representing federal lands in CAST across both historical and future scenarios.</p> <p>Discussion: Kevin Du Bois, DoD: I'm not sure I understand why you are reclassifying cropland in the past.</p> <p>Peter Claggett, USGS: Let's say Aberdeen has 100 acres of agriculture in 2022. We would remove those 100 acres, and whatever remains becomes the fixed, constant footprint through time. But let's say in 2017, we had mapped 120 acres of agriculture. Now we've got a situation where 20 of those acres are still mapped as agriculture on the federal property, but we can't have agriculture on federal lands in CAST—there's no such thing as federal agriculture in Phase 7. So we have to reclassify those 20 acres into a land use that is valid for federal agencies in CAST, and in this case, that would be compacted pervious. We have to preserve the total acreage, so that's how we handle it.</p> <p>Kevin Du Bois, DoD: Why don't you just take those 20 acres and give it to the states, just like the 100 acres that you're gonna do now?</p> <p>Peter Claggett, USGS: Because then the acreage property of the federal footprint would change through time and that isn't allowed by the rules that were set in Phase 6 by the Modeling Team, nor would they be allowed in Phase 7.</p> <p>Kevin Du Bois, DoD: Would we get a higher loading rate then since compacted pervious loads are higher than agriculture?</p> <p>Peter Claggett, USGS: No, compacted pervious is one of the lowest, agriculture is one of the highest.</p>
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	<p>Kevin Du Bois, DoD: Ok</p> <p>Katie Brownson, USFS: I think I agree with your logic in terms of looking back in time, that we're unlikely to see buildings or more impervious land uses going to agriculture, but is this also the method that would be used for forecasting too?</p> <p>Peter Claggett, USGS: I included future years (refers to the slides) just to cover all the bases, but the truth is, we're only forecasting urban growth. We're not going to forecast an increase in agriculture in the future. What's actually going to happen is agriculture, forest, and compacted pervious will decrease due to urbanization—and that's all on non-federal land. For federal lands, we're not forecasting any change at all. So really, I should've left future years out entirely because they don't apply here and only add confusion. These rules don't get triggered by the forecast since it's only for urbanization on non-federal land. So there's no need for concern about future years affecting this process.</p> <p>Olivia Deverux: Peter, can you edit the slides in real time so we're all clear on documentation moving forward?</p> <p><i>Marilyn proceeds to update the slides based on Peter's recommendations. Following the meeting, Peter updated slide 8 further which can be reviewed here.</i></p> <p>Katie Brownson, USFS: I just want to make sure we're clear on how we're handling the future. I understand we're not projecting agriculture growth in the future, but when you get your new land use data for 2025, if there is less agriculture than there was in 2022...</p> <p>Peter Claggett, USGS: Then, that would trigger this, but that's not really the future that would be the present.</p> <p>Katie Brownson, USFS: Right, the new present. Even looking into the future—say in 2025 or 2026—if we end up mapping less agriculture than we did in 2022, wouldn't it make sense to consider that agriculture could be converting into other land uses besides just forest or compacted pervious? I get that in the past it's probably mostly shifting from those two, but going forward, agriculture could realistically be transitioning into more developed land uses. That's the point I was trying to make that agriculture might not always revert to natural land covers; it could become something more urban or developed.</p>
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	<p>Peter Claggett, USGS: I see what you're saying, and I was originally trying to keep things simple so it would be easier to handle in CAST. But for the scenario you're talking about—like in the next high-resolution mapping year—we'll actually have detailed data on land use transitions. So, we could be more precise about where those acres go, meaning we could track exactly what agriculture land converts into by 2025. I'm not ready to commit to doing that just yet, but it's definitely something we can consider looking into.</p> <p>Katie Brownson, USFS: Thanks for considering, yeah it wouldn't be as accurate to kind of gradually shift all the forest land off the federal footprint because we have these arbitrary decision rules.</p> <p>Peter Claggett, USGS: Right, correct.</p> <p>Auston Smith, EPA: Thank you Peter for walking though that and for everyone's input. Any other questions or comments?</p> <p>Rene Senos, NPS: All of the land use adjustments, reclassifications, and shifting responsibilities has been a lot to track in this discussion. Will there be a summary of this for us to consider in the future that is more fleshed out?</p> <p>Peter Claggett, USGS: I can provide a summary and write out those hypotheticals on the slide, including the one that Katie raised, so that hopefully we can all be on the same page of what this means.</p> <p>Helen Golimowski, Devereux Consulting: I would be happy to create some visual that demonstrates this as well and can work with you. I can mock something up and send it to you Peter.</p> <p>ACTION: Peter Claggett and Helen Golimowski will work together to create summary materials from this discussion, including a written summary explaining the hypothetical recommendations for fixing federal facility area from 1985-2022 (including Katie's suggestion) and a visual to help demonstrate these scenarios to the workgroup for future review and consideration.</p> <p>POST MEETING UPDATE: Link to the follow-up PowerPoint summary and visual explaining the recommendations. If you have any questions or concerns about the content, please contact Peter Claggett (pclagget@chesapeakebay.net) and Helen Golimowski (helen@devereuxconsulting.com)</p>
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<p>10:45 – 11:30</p>	<p>IV. Finalizing the Discussion on Tracking and Crediting Federal Land Uses/BMP Types Unassigned in CAST – <i>Auston Smith (US EPA CBPO) and Peter Claggett (USGS)</i></p> <p>Per the follow-up email from Peter Claggett to the FFWG on June 10th, the tracking and crediting alternative suggested for federal practices during the June meeting would be onerous for both jurisdictions and the CBPO and should likely not be explored. The workgroup has exhausted many avenues surrounding this topic, so conversations will be had regarding the proposed finalization of this agenda item.</p>	<p>Materials:</p> <ul style="list-style-type: none"> • Summary of Status Quo Reporting Methods • Follow-up Email to the FFWG (6/10/2025) • Issue Paper: Tracking and Crediting Federal Land Uses/BMPs Currently Unassigned (5/6/2025) <p>Auston provided a recap of the ongoing discussion, noting that federal agencies are currently assigned loads in the developed and natural sectors, however, other land uses and BMP types—such as construction, septic, harvested forest, and agriculture (cropland and pasture/hay)—are not attributed to federal agencies under the Phase 6 Watershed Model. Instead, these loads are assigned to the state jurisdictions where they reside.</p> <p>As part of the Phase 7 Watershed Model planning, the FFWG has spent the past year examining whether these unassigned sectors could be tracked and credited by federal agencies in CAST. Through multiple meetings, the group was presented with several options and evaluated each sector individually, weighing the challenges and potential opportunities. That said, the general sentiment gathered from the past meetings is that assigning these loads to federal agencies would be a significant lift primarily due to the need to establish a consistent federal baseline and a reliable mechanism for annual reporting—both of which are constrained by funding and capacity limitations.</p> <p>He prompted the discussion by clarifying that this is not a formal vote, but stated that if no concerns were raised, we can consider this topic closed for Phase 7 and shift focus to other priorities. However, if any members feel differently, he encouraged members to share their thoughts.</p> <p>Discussion: Liz Dawson, USFWS: I think it's a reasonable request to ask the states to report to the federal facilities on how much credit they're receiving for the federal lands.</p> <p>Auston Smith, EPA: Maybe I am unclear, can we already see that break out in the CAAST reports?</p> <p>Olivia Devereux, Devereux Consulting: We can see where federal agencies get credit in CAST—it's visible for the land uses and load sources that are explicitly assigned to them, like stormwater. However, for land uses federal agencies aren't assigned to—like agriculture, construction, or harvested forest—they aren't going to receive credit for those practices. Instead, that credit goes to the states.</p> <p>Now, if the states reported in CAST that a practice occurred on federal land but labeled it as state (or non-federal), we could potentially sort that out. It would be complicated, but</p>
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	<p>technically possible. The challenge is that we often just don't know. For example, NRCS ag data is only available at the county level because of USDA privacy concerns, so we can't tell whether it happened on federal land or not—and the states can't either when they don't know.</p> <p>So while CAST shows reductions for the load sources federal agencies are responsible for, it doesn't capture everything, and that makes it hard to trace or assign credit accurately in some cases.</p> <p>Kevin Du Bois, DoD: For the DoD, we develop annual BMP credit reports. These reports list every BMP we submit to the jurisdictions and include whether or not those BMPs received credit in CAST. If they didn't, the report outlines potential reasons—sometimes it's on us, like when installations can't complete inspections or maintenance. Other times, it's due to issues transferring BMP data through NEIEN. We share these reports with both the jurisdictions and EPA, so I just wanted to make sure you were aware of that.</p> <p>Liz Dawson, USFWS: We have a list of all of our BMPs and it includes agricultural BMPs—we've put significant effort into that area. One thing I want to raise before we go too far is that the overall effort was originally set to end in 2025. However, if the effort continues and we're still expected to implement BMPs, I'm a bit concerned. I don't mind if states get credit for our ag BMPs, but it could make it look like we're not doing much, even though we are. Going forward, it would help to have a way to show that work—even if we didn't get credit in CAST—so we're not in a position where we're assigned goals we can't realistically meet. Having that narrative could be important.</p> <p>Olivia Devereux, Devereux Consulting: Liz, I think there are two parts to your question that I want to respond to. First, about how you can tell which BMPs are from the USFWS vs. those on non-federal land—that's really something the state reps on this call would need to help answer. Each state will have different data and approaches, so it's best to work with them directly on how to sort that out.</p> <p>Second, regarding the TMDL deadline—yes, there was a self-imposed deadline for 2025, but it hasn't been met and won't be met by then. Even if it had been, the work would still need to continue. Meeting water quality criteria requires ongoing BMP implementation to maintain and continue reductions in pollutant loads.</p> <p>So nothing was ever going to just “stop” in 2025, even under ideal circumstances. EPA will still be conducting an evaluation for 2025, but we don't have that data yet because of the typical lag in BMP reporting. That's also why we're developing the Phase 7 model now, using updated data and science. It will include new load estimates, new planning goals,</p>
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	<p>and new WIPs. States will be responsible for setting planning goals and determining how to meet them going forward, and that process will be ongoing.</p> <p>So again, for identifying agricultural BMPs on federal land, I recommend working with the states—each one will have its own way of handling it.</p> <p>Liz Dawson, USFWS: What is the current timeline looking like for continuing this BMP implementation and how far away do we seem to be from where we want to be?</p> <p>Auston Smith, EPA: For 2024 progress, nitrogen across the watershed—including atmospheric deposition—was at 59% of the goal. So we’re closer to reaching the goals for both phosphorus and nitrogen, but Liz, I can’t speak right now to how many more progress years it might take to hit 100% for each. The PSC already determined and accepted that the 2025 goals won’t be met. That’s one reason we’re seeing a revised watershed agreement and renewed discussions around planning efforts.</p> <p>Kelly Gable, EPA: Just a tiny tweak to what was said—there isn’t actually a deadline in the TMDL itself. The 2025 date—whether you call it a deadline, goal, or timeframe—was set by the partnership and actually predates the TMDL by several years.</p> <p>The way 2025 got tied into the TMDL is through the Phase I WIPs. Each state developed a final WIP, and for the most part (with a few exceptions), the allocations in those WIPs were used in the TMDL. When EPA evaluated those WIPs using the modeling tools, we looked at whether they aligned with the partnership’s 2025 goal.</p> <p>So, it’s a little complicated and often needs to be teased apart, but I just wanted to make that clear for folks. Also, the TMDL doesn’t expire—that’s not a thing in either the statute or the regulations. It will keep going, and especially for point sources, permits will need to continue being issued that are consistent with those allocations.</p> <p>Kevin Du Bois, DoD (in chat): Kelly Gable, could you please identify your affiliation?</p> <p>Auston Smith, EPA (in chat): EPA Region 30 Office of Regional Counsel</p> <p>Kevin Du Bois, DoD (in chat): What is ORC Regional council?</p> <p>Kelly Gable, EPA: Yes, regional council, the lawyers basically.</p> <p>Liz Dawson, USFWS: We really need to know what those numbers are. Because right now, it feels like we’re giving away a lot of what we’ve accomplished, and I think we deserve to</p>
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	<p>know those numbers one way or another.</p> <p>Auston Smith, EPA: And those numbers would be the difference between what is shown on cast for federal agency credit, but then also what the state needs to report as the other sectors that federal agencies don't get credit for. But those practices in the counties where they know their federal agencies, what is the breakout of credit applied to them that is from the federal facilities? That's the difference you want?</p> <p>Liz Dawson, USFWS: Yes, I think we should have that.</p> <p>Auston Smith, EPA: As Olivia mentioned, there's currently an agreement between USDA and USGS that agricultural data is aggregated at the county level, with all personal information removed—that's what the states receive. So, I think it's going to depend on each jurisdiction's ability to tease out which practices happened on federal facilities within that county versus those that didn't.</p> <p>I'm happy to help facilitate those discussions with Olivia, but this might require reaching out to each state individually offline to figure out if and how that information can be produced—and whether it could be done annually for your tracking purposes. Would that be acceptable?</p> <p>Liz Dawson, USFWS: I would like something more concrete than that. I understand the limitations of the situation, but I feel pretty strongly about this.</p> <p>Olivia Devereux, Devereux Consulting: It might be helpful, along the lines of Liz's questions, to have Helen share at a future meeting—maybe a quick 10-minute demo—to show a comparison of various scenarios in CAST. This way, federal agencies can see how to view those comparisons themselves. It could include some graphs or tables showing planning goals, planning targets, and progress to date.</p> <p>Katie Brownson, USFS: I agree that I think it would be really helpful to have some kind of mechanism or system for better tracking federal BMP implementation, even if it's not through CAST. I tend to agree that developing and implementing some of the changes we discussed would be really challenging and likely not palatable to the partnership.</p> <p>So maybe more of an informal sort of crediting mechanism, where federal agencies that are participating in implementing and reporting BMPs can just be able to show what the impacts of their work are for the Chesapeake. I think that would be really helpful, even just to help some of the agencies feel like it's worth their time to do the reporting—</p>
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	<p>because, speaking for the USFS, we're super capacity limited right now.</p> <p>Auston Smith, EPA: I agree that a breakout would be good. I don't know what to promise, maybe I can reach out to a couple jurisdictions about what a breakout may look like on their end, but I recognize that it's useful to point to where they are sending. What I am tentative about is that we keep running into this data sharing agreement.</p> <p>Katie Brownson, USFS: I think that data agreement is for private facilities, not for practices implemented on federal lands by federal facilities.</p> <p>Auston Smith, EPA: My understanding is—and I'm not speaking officially for any federal agency, so please correct me if I'm wrong—that many agricultural practices occurring on federal facilities actually happen on leased land. Wouldn't that mean those practices are covered under the 1619 protections?</p> <p>Olivia Devereux, Devereux Consulting: Yes, if agricultural practices occur directly on federal agency land, like with the USFWS, they would likely be reportable. But it's not since many are on leased land managed by private individuals, which is the same justification that federal agencies gave for not taking responsibility for agricultural lands, so we're kind of going in a circle on this.</p> <p>Auston Smith, EPA: Yeah, I don't want to overpromise, but I will commit to reaching out to a jurisdiction or two to get a sense of their capacity to look at this for annual progress. And maybe in about two months, it would be helpful for Helen to provide an overview of CAST reports to show what we're already capable of displaying.</p> <p>Kevin Du Bois, DoD: I'm concerned about this mission creep, I thought the idea was to close this and it seems like this would be rehashing. If individual agencies want to pursue a better understanding of their contributions, I'm not going to stand in their way, but my understanding was that today we'd vote on whether to continue the discussion or not. And from what I heard, Austin, you don't want to pursue a vote anymore, but rather allow us to decide whether to close discussions on this topic?</p> <p>Auston Smith, EPA: Right, I didn't think we need a formal vote to not discuss a topic any longer.</p> <p>Liz Dawson, USFWS: Well for USFWS it's a big deal and I'm not sure if others are dealing with it.</p> <p>Kevin Du Bois, DoD: When these decision points have come up in past meetings, we were</p>
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	<p>asked directly whether we'd support enhanced reporting in these four areas. I've consistently provided white papers because I personally can't make decisions about major policy or procedural changes for DoD within the partnership. I've spent a lot of time briefing up my chain of command to get clarity on how DoD—not just me—wants to approach these issues. And now I have clear direction from headquarters on how we're to handle this. I thought we were going to resolve this today, but it doesn't seem like that's happening. As a federal facility workgroup, I can't support us continuing to belabor this issue.</p> <p>Auston Smith, EPA: I'm starting to see these as slightly different issues. Kevin, I think what we've discussed at length in the past around federal agencies being allocated loads for different sectors doesn't seem to be of interest to the workgroup. But Liz, what I'm hearing from you is that having better insight into what credit a jurisdiction is receiving for practices that are actually happening on federal facilities would be useful, and could help inform possible next steps.</p> <p>Liz Dawson, USWFS: Yes, I think that's right. We've been in this situation before—trying to address loads—and this is a key piece of data that we'd be missing if we don't address it. I'd also echo what the USFS representative (Katie) said: why would we report if there's no impact? If it takes more meetings to talk through this and figure it out, then I think we should do that.</p> <p>Kevin Du Bois, DoD: I want to clarify I'm not against the work, I'm worried about the target changing about what we are moving up the chain of command. I don't think you can have a question about the credit you are getting, you can't decouple the credit from the load.</p> <p>Auston Smith, EPA: I do want to be clear, I am hopeful there is no need for you to go further up the chain, what I am hearing is that there is not appetite to discuss allocating loads for new sectors to federal agencies. So that's not a moving target. And unless I hear otherwise, that can be the final brief you need to give your leadership on that.</p> <p>Katie Brownson, USFS (in chat): Maybe there's an opportunity to disentangle the crediting vs. tracking BMPs. Agree crediting is probably a dead-end at this point, but some better mechanism for tracking would be helpful to workshop further</p> <p>Peter Claggett, USGS (in chat): If the request for clarification won't impact Phase 7 decisions, then can we advance the Phase 7 decision to not report septic, agriculture, construction, and harvested forest from federal facilities?</p>
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	<p>Kevin Du Bois, DoD: I would need this documented somewhere that we ceased this discussion.</p> <p>Auston Smith, EPA: Absolutely—that will be included in the minutes. Also, for the concerns raised by Liz and Katie, I think there may be a way to disentangle crediting from simply tracking federal agency contributions to the overall effort. This wouldn't necessarily require increased reporting or effort from the federal agencies. Instead, it could be something the CBPO could take the lead on—looking at what can be teased out in counties where we know there are federal facilities, particularly for ag practices.</p> <p>I'm planning to reach out to some jurisdictional partners to explore what might be possible there. I also think this would be a useful topic for future FFWG calls.</p> <p>Liz Dawson, USFWS: Thinking back to Kevin's comment, I really think that even if the states are taking credit for the BMPs on federal land, it's still federal land and work done by the USFWS.</p> <p>Kevin Du Bois, DoD: Yeah, we're thinking differently, I'm thinking of land outside of the fence line vs outside the fence line. For DoD, we know what we're doing in terms of BMP application inside the fence line.</p> <p>Auston Smith, EPA: I think it might be helpful for us to have a follow-up conversation offline, especially if there's any confusion—maybe around land uses that aren't being reported on. But since I didn't hear anything from the group about continuing down that path, we'll document that and move on.</p> <p>What I am hearing from a couple of federal agencies is interest in a topic for future consideration: possibly working out a way to track those harder-to-discern practices.</p> <p>Rene Senos, NPS: The feedback loop that's been described reminded me of the study you did back in 2022 on our progress. I wonder if folks remember those recommendations from 2022, when we were looking at our progress, identifying gaps, and figuring out where improvements could be made. It often feels like we report information, but then there's confusion about what states and jurisdictions are actually counting as BMPs, and where the disconnects are. Speaking broadly, I think it would be worthwhile to revisit some of those recommendations since they seem quite relevant to this discussion.</p> <p>Auston Smith, EPA: I believe you are referencing the Brown and Caldwell report.</p> <p>Olivia Devereux, Devereux Consulting (in chat): This is the report Rene is mentioning.</p>
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https://www.chesapeakebay.net/files/documents/federal_agency_evaluation_final.pdf

Rene Senos, NPS: Yes, all the federal agencies reviewed that report and actually added more suggestions to it. I just want to make sure as we're moving forward, we're benefiting from that work.

Auston Smith, EPA: We definitely don't want to reinvent the wheel or go in circles on things that have already been hashed out. The Brown and Caldwell report is a solid reference for moving forward, especially regarding the potential to break out AG practices for enhanced reporting.

What I'm hearing now is maybe in about two months, Helen and Olivia could come back with a CAST report overview relevant to federal agencies. Then, Renee, maybe I can work with you and Olivia to identify some key points from the Brown and Caldwell report that would be worth exploring first—especially around clearly breaking out what federal agencies are doing within a county versus what the jurisdiction is credited for.

Kevin Du Bois, DoD (in chat): I think Olivia's suggestion was a good one. These issues could be worked out during coordination with jurisdictions during Phase IV WIP development.

Auston Smith, EPA: Responding to Peter's comment, there is no dissent towards the idea of putting the topic for Phase 7 to rest. Federal agencies will not septic, construction, harvested forest, or agriculture in Phase 7.

Katie Brownson, USFS: Well, in some cases, agencies report them they just don't get allocated the loads.

Olivia Devereux, Devereux Consulting: For clarify, perhaps the decision can be: Federal agencies will not be assigned land uses from those specific categories, but they can still report BMPs to the states, and those practices will be credited as either federal or non-federal depending on the sector whether it's on septic, or ag vs. storm water. But it doesn't have to do with the BMP reporting, but rather about the land use and the responsibility for loads from that land, which federal agencies are being exempted from. Is that a more accurate way to frame it? Does that align with what others are thinking?

Rene Senos, NPS (in chat): Yes Olivia

Auston Smith, EPA: I think that's perfectly accurate—thank you, Katie, for pointing out my error. We'll go ahead and type that up and make sure it's formally included in the

		<p>minutes. Thank you, Peter.</p> <p>DECISION: In Phase 7, federal agencies will not be assigned land uses from these specific categories—septic, construction, harvested forest, and agriculture—but they can still report BMPs to the states, and it should be submitted as fed or non-fed accurately, and then it will be reassigned on CAST to non-fed as necessary depending on the sector (septic and agricultural BMPs are credited to the states, but not harvested forest or construction). Further discussion on new rules in CAST around how to track BMP information from the federal agencies will be discussed further at future meetings.</p> <p>ACTION: Auston Smith will work with Rene Senos and Olivia Devereux to identify key points from the Brown and Caldwell report to build on the discussions around tracking BMPs—especially around clearly breaking out what federal agencies are doing within a county versus what the jurisdiction is credited for.</p> <p>ACTION: Auston Smith will reach out to jurisdictions to explore what a breakout of BMPs credits between federal agencies and states might look like and what capacity they would have to do so.</p> <p>ACTION: In two months, Helen Golimowski and Olivia Devereux will provide a CAST report showing planning goals, planning targets, and progress to date. During a future meeting, they will also provide a short demo showing a comparison of various scenarios in CAST, so that federal agencies can see how to view those comparisons themselves.</p>
11:30 – 11:45	<p>V. Beyond 2025 - Figuring out the Next Steps for the FFWG – Auston Smith (US EPA CBPO)</p> <p>With the Partnership undergoing the Beyond 2025 process to revise the Chesapeake Bay 2014 Watershed Agreement, the future of the goal teams and workgroups are currently in flux and many will experience changes and restructuring following the adoption of the revised Agreement.</p> <p>Given this, it's timely to discuss with the FFWG what vision and role they see this workgroup playing after 2025, including what priorities and topics may be of interest to the members.</p>	<p>Discussion:</p> <p>Auston Smith, EPA: Especially as Phase 7 work continues, are there issues or ideas we should continue to chew on in future meetings?</p> <p>Kevin Du Bois, DoD: I know we've talked on and off about updating jurisdiction templates to allow for the reporting of purchased nutrient credits. If I remember correctly, DC was the only jurisdiction that expressed interest, while others were either neutral or opposed.</p> <p>Now that DoD has the authority to purchase nutrient credits, I expect we'll have credits to report before next year's data call. But unless the jurisdiction-specific templates are updated to allow for that, we won't be able to get those BMPs into the model.</p> <p>So I'd like to renew the request that all jurisdiction partners update their templates to allow reporting of purchased nutrient credits, so we can properly reflect those efforts in</p>

	<p>the model moving forward.</p> <p>Auston Smith, EPA: For our jurisdictional partners on the line, how feasible would it be to update your templates to allow for the reporting of purchased nutrient credits? Are there any concerns or hesitations on your end? Is it a relatively simple change?</p> <p>Kelly Gable, EPA: I just wanted to ask a quick clarifying question. If a federal agency is purchasing a nutrient credit, that credit would have been generated by someone else, correct? And in that case, wouldn't the BMP associated with generating the credit already be reported. So, my follow-up is: is there any concern about double counting—meaning the load reductions are being claimed both where the credit was generated and again where it was purchased?</p> <p>Kevin Du Bois, DoD: Yeah, I'm not exactly sure how it works when a nutrient credit bank is established—whether the bank is assigned the load and then the credit gets assigned separately. But if that's how it works, then yes, there would need to be some mechanism for the state to transfer the credit from the entity that generated it to the one that purchased it. That's my basic understanding of how it would need to work.</p> <p>Kelly Gable, EPA: Hopefully we can get that flushed out here, I'll defer to Tyler.</p> <p>Olivia Devereux, Devereux Consulting (in chat): There are established reporting protocols for BMPs that were used for a credit. This is all accommodated in the reporting methods the states use.</p> <p>Alicia Ritzenthaler, DC DOEE (in chat): I believe that DOD has already talked with DOEE's Regulatory Review some about this. I would need to confirm with my team but I believe that there aren't any significant constraints given that there is a process for us to report this via the existing NEIEN schema if it were to occur. Any comments on the later point Olivia Devereux?</p> <p>Olivia Devereux, Devereux Consulting (in chat): It is already set up in the NEIEN schema.</p> <p>Tyler Trostle, PA DEP: Kevin, we talked about doing this in PA a while back. It's not an easy task. We have a contractor who handles most of our template updates and data architecture. We're looking at incorporating nutrient credit trading, potentially by next year, but I can't promise it'll be ready for the 2026 progress report. There's a cost involved—estimated around \$23,000—to update the schema, template, and maintain the new database architecture. We're working on it as we finalize our contract, so it's possible</p>
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	<p>but not guaranteed yet.</p> <p>Auston Smith, EPA: It might be too early to ask, but would there be a time when it'd be possible for you or someone on your team to provide an overview of the update? It would be really helpful, especially in light of Kevin's request, to share your experience and maybe assist other jurisdictions as they consider making a similar shift.</p> <p>Tyler Trostle, PA DEP: In the future we can definitely go over what's been done. It's mostly a schema-related update, but since internal architectures differ across jurisdictions, it can vary a bit. I'm open to providing an update down the line. I have some funds allotted that could potentially cover this work, but I can't guarantee they won't be used for something else. So, while there's a possibility to have it done for the 2026 progress report, I'm not ready to promise that yet.</p> <p>Auston Smith, EPA: It's great to hear that the update is already completed on DC's end. Maybe Alicia or Olivia, could you provide a brief update on what it took to make that update? For example, how easy or difficult it was, any challenges you faced, or if there were minimal constraints.</p> <p>Alicia Ritzenthaler (DC DOEE): To be clear, DOEE hasn't submitted any BMPs through the trading credit process yet. When the topic first came up and DoD showed interest, we looked into it. As Olivia confirmed, NEIN already has a way to report a BMP located in one place but credited to another entity. We haven't used that part of the schema because we don't have any such BMPs here in DC.</p> <p>My understanding is that this process already exists and fits within our current system. Our DC database tracks the physical location of each BMP and has a separate field indicating ownership—that is, who gets credited. Assuming there are no issues implementing this existing schema, I don't foresee any problems. We would just need to familiarize ourselves with the schema, but as Olivia mentioned, it's already built into NEIN</p> <p>I wasn't part of the initial conversations, so maybe Kevin can add if he has any different insights from discussions with our regulatory review division. But to my knowledge, there aren't any concerns.</p> <p>Kevin Du Bois, DoD: No, that's not really my area of expertise, so I'm not aware of any problems. But I've been raising this possibility for several years to try to get ahead of the ball. I'm not sure what we'll do when we have a Bay Program approved BMP that we can't get credit for because the jurisdiction's process isn't set up to record those BMPs. I guess</p>
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	<p>we'll continue to track them for now, but it's definitely something to work through.</p> <p>Olivia Devereux, Devereux Consulting: Kevin, this process has been set up in the NEIN schema for more than five years. We've had meetings here and in the Watershed Technical Workgroup about how jurisdictions can submit these credits. The investment was made because we support trading where it aligns with the TMDL, including accounting for new growth and meeting TMDL targets—Kelly can certainly speak more on that.</p> <p>That said, although the method to accept nutrient credits has been in place for at least five years, no one has reported them yet. But the Bay Program side is ready, and I'm glad Alicia confirmed that DC is set up to do so as well. Now, it's really up to the other states. I'm excited to hear that DoD is planning to purchase credits and use that offset option—that's something MS4 programs encourage, depending on the state.</p> <p>Have you had discussions with each state about how you will report this and what their plans are? Is there any technical information the Bay Program Office can provide to help facilitate this? From my perspective, this seems to be an issue between DoD and the states since the Bay Program doesn't manage each state's data system—they manage their own.</p> <p>Kevin Du Bois, DoD: That's why I'm bringing it here at the Federal Facilities Workgroup meeting.</p> <p>Olivia Devereux, Devereux Consulting: Gotcha, I just wanted to make sure that it wasn't a problem on the Bay program office side because we're ready.</p> <p>Kevin Du Bois, DoD: I've been bringing it up in this forum because I think back in 2022, the National Defense Authorization Act allowed DoD to purchase nutrient credits, but the process wasn't fully defined until recently. VA installations will soon buy credits to meet MS4 permits and report them next year. My concern is that if jurisdiction templates aren't updated to capture purchased credits, these BMPs won't be properly recorded or reported in CAST. Some jurisdictions like DC and Pennsylvania are prepared, but others aren't, risking gaps in progress tracking. I'm raising this here to encourage collaboration between federal facilities and jurisdictions to fix this reporting issue.</p> <p>Olivia Devereux, Devereux Consulting: (in chat): DC has acknowledged that they are ready. PA indicated that they are ready to make the investment next year to their data system. Could we do a round-robin with the other states?</p> <p>Auston Smith, EPA: Thanks, Kevin, and great summary, Olivia. It sounds like DC and PA</p>
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	<p>have their next steps pretty well figured out. Kevin, maybe you and I can follow up offline to identify what other follow-ups might be needed. This is definitely the right place to raise these concerns, thanks again.</p> <p>Olivia Devereux, Devereux Consulting: Kevin, you mentioned purchasing Virginia credits for the facilities there. Have you connected with Arianna—who I think is on this call? Maybe she can share an update on where Virginia stands with their BMP data warehouse system.</p> <p>Arianna Johns, VA DEQ: VA currently does not have a way to take these reports. We have another mechanism that's not related to our warehouse that deals with that.</p> <p>Olivia Devereux, Devereux Consulting: So you have a system in place?</p> <p>Arianna Johns, VA DEQ: It's handled through a completely different division and it's not us.</p> <p>Auston Smith, EPA: Thanks, Arianna, I might reach out after the call to get a contact from you to see if they'd be open to a schema update or adjustment.</p> <p>Kevin Du Bois, DoD (in chat): Can we get comments from Maryland?</p> <p>Mike McMahon: We do have someone specifically assigned to accrediting this. I'd need to put him in contact with Dylan, who would be handling the necessary submission. Kevin, please drop me an email or share your email address, and I'll connect you both.</p> <p>Kevin Du Bois, DoD (in chat): kevin.r.dubois.civ@us.navy.mil</p> <p>Mike McMahon mike.mcmahon@maryland.gov</p> <p>Auston Smith, EPA: Any other topics for future meetings?</p> <p>Katie Brownson, USFS: One topic for a future meeting, I understand there's going to be a new approach to milestones, including those for federal agencies. It sounds like we'll be asked to develop something like two-pagers. That might be a good opportunity for us to come together and discuss whether we can create a common template or framework. Collaborating on this could help streamline the process and reduce the workload as we adapt to the new approach.</p> <p>Auston Smith, EPA: That's a great flag, any others?</p> <p>Katie Brownson, USFS: Another idea is to discuss the revised watershed agreement. Some</p>
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	<p>of us know the details well, but others may not. After the Executive Council meeting in December, it would be helpful to review the updated agreement and how federal agencies are engaging with it.</p> <p>Also, when Greg Allen was involved, he wanted to expand this group's focus to include non-water-quality topics that support other outcomes. That could be a good starting point for a broader discussion.</p> <p>Auston Smith, EPA: Yes, once everything's finalized, an overview of where the revised agreement stands regarding the federal family and where it's headed would be really helpful.</p> <p>Rene Senos, NPS: This is more of a question for the group than a future topic. Has anyone else been contacted by the engineering firm AMT? They were apparently hired by the Chesapeake Bay Trust to conduct a research project called <i>Beyond Bean Counting: Assessment of BMP Tracking and Accounting Procedures</i>. I just wanted to see if anyone else was familiar with this.</p> <p>Kevin Du Bois, DoD (in chat): DoD participated in those Beyond Bean Counting surveys.</p> <p>Tyler Trostle, PA DEP (in chat): PA participated in the surveys as well.</p> <p>Auston Smith, EPA: Yes, that is a real thing. I'm a part of that group and they asked me who else from federal agencies it would be useful to contact, so I shared some emails from our members. The purpose is to walk through BMP reporting and explore benefits beyond just counting credits for nitrogen, phosphorus, and sediment.</p> <p>Kevin Du Bois, DoD: One thing I liked that the contractor did was they took notes and then circulated them back for our approval beforehand to make sure their notes are accurate which was very professional. I say that for anyone on the bubble about participating.</p> <p>Auston Smith, EPA: Yeah, Renee feel free to reach out to me via email if you have any other questions or concerns around that effort and thank you for asking since I know it sounds like a fishy name.</p> <p>ACTION: Auston Smith will follow-up with Arianna Johns regarding nutrient credit reporting to see if VA DEQ is open to a schema update or adjustment to their reporting templates.</p> <p>ACTION: For future meetings, the following discussion items were suggested:</p> <ul style="list-style-type: none"> ● Identify and establish procedures to incorporate nutrient credit purchases in state
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		<p>reporting templates</p> <ul style="list-style-type: none"> • Create a common template or framework for milestone reporting to streamline the process and reduce the workload • Once the revised agreement is finalized, the FFWG leadership will provide an overview of the changes and specifically how it will impact federal agencies engagement
11:45 – 12:00	VI. Wrap-up and Conclude Next FFWG Meeting: October 14th, 2025 (10:00am-12:00pm)	