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

Date: June 10th, 2025
Time: 10 am – 12 noon
Meeting Materials



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Time	Agenda Item	Materials, Notes, and Action Items
10:00 – 10:10	<ul> <li>I. Welcome, Introductions, Announcements –         (Auston Smith, US EPA CBPO)         <ul> <li>For roll call purposes, please enter your name &amp; affiliation into the chat. Call-in participants are requested to identify themselves verbally.</li> <li>Review of the FFWG membership list</li> </ul> </li> </ul>	ACTION: Members are requested to review the FFWG member voting list to ensure the names are up to date and accurate. Please send any updates to Auston Smith, EPA (smith.auston@epa.gov) and Marilyn Yang, CRC (myang@chesapeakebay.net)
10:10 – 10:30	II. Progress Update on the Data Call for Updating the Federal Boundaries Data Layer for Phase 7 – (Coral Howe, USGS and Sophie Waterman, USGS)	<ul> <li>Materials:         <ul> <li>Federal Facilities Review Viewer</li> </ul> </li> <li>Action Paper: Updating the Federal Boundaries Data Layer</li> <li>Presentation: Updating the FFWG</li> </ul>
	Coral and Sophie will review the final draft of the updated federal facilities boundaries layer, which will go into effect in Phase 7. They will also share a pre- and post-update analysis of acreage differences, as requested by members	Coral provided an update saying all the requested changes from the data call were incorporated, including replacing entire footprints with new data and addressing specific property-level comments. They also reviewed properties in the "Other" category and removed some areas that were verified to not be federal properties.
	of the workgroup during the April FFWG meeting.	Coral presented a chart showing the pre- and post- acreage changes by agency to date. To calculate the acreage as accurately as possible, they converted vector data into raster (pixel-based) format, which helps resolve overlap issues between polygons
	Any remaining gaps—such as those related to the additional "Other Federal Facilities" category in the Federal Facilities Review Viewer—will be discussed. Time will also be	without needing subjective decisions. Based on the results, there weren't major changes, mostly slight reductions in acreage across a few agencies from new or corrected polygon shapes.
	reserved for agencies to ask follow-up questions.	For example, Coral referenced the reduction in USFS acreage as reflections of corrections in boundaries due to distinctions between proclaimed designations and

actual ownership. These changes are part of an ongoing effort across agencies, similar to work on protected lands.

Coral requested the federal agencies provide any final comments on the updated data layer so they can move forward with finalizing the data layer Phase 7.

## **Discussion**:

Auston Smith, EPA: Asked the group if they had any questions or comments. Hearing none, he informed the group that during the August 12th FFWG meeting, we will hold an official vote to finalize this updated federal facilities boundaries layer for Phase 7.

ACTION: Please review your agency's updated layer on the <u>Federal Facilities Viewer</u>. If you notice any remaining discrepancies, please send feedback to Coral Howe (<u>chowe@usgs.gov</u>) and Sophie Waterman (<u>swaterman@chesapeakebay.net</u>) so they can be incorporated into the data layer prior to the August 12th FFWG vote.

10:30 **–** 11:30

III. Continued Discussion on Tracking and Crediting Federal Land Uses/BMP Types
Unassigned in CAST – (Auston Smith, US EPA CBPO and Peter Claggett, USGS)

Auston will review the updated issue paper, which summarizes the feedback received thus far on each unassigned land use/BMP type. While a vote was previously suggested for the June meeting, the issue paper highlights the complexity of these topics and the need for additional time. As determined during the April meeting, this time will be used to continue evaluating the options.

FFWG members are requested to discuss each land use/BMP type internally with their agencies prior to the June 10th meeting to aid the discussions.

## Materials:

 <u>Issue Paper: Tracking and Crediting Federal Land Uses/BMPs Currently</u> <u>Unassigned (5/6/2025)</u>

Auston started off the discussion by providing background context on the ongoing discussions. He referenced the updated <u>issue paper</u> which includes context for the impetus of these discussions as outlined in the Brown and Caldwell report, and lists the four sectors we've been discussing over the past months: septic, construction, harvested forest, and agriculture (cropland and pasture/hay).

Summarizing the recent feedback, he indicated that construction and agriculture/cropland present the most challenges, particularly in establishing baselines and managing annual reporting tied to load allocations. Septic and harvested forest, however, appear more feasible for near-term progress.

Auston encouraged the group to share their thoughts with the goal of gauging whether to move forward with considering how to assign and track these federal land uses/types or to conclude discussions and not move forward due to concerns such as capacity, etc.

## Discussion:

Angela Jones, DoD: Sitting in for Kevin, the DoD is still awaiting guidance on these 4 areas.

Auston Smith, EPA: Do you think August would be a doable timeline for making a decision on these areas?

Angela Jones, DoD: I can't speak definitively on that, but that would give us more time to look into this and wait for additional guidance.

Auston Smith, EPA: For the rest of the group, is there insight you can provide on any of these sectors.

Peter Claggett, USGS: It might be helpful to clarify the status quo and what would happen if nothing new is done. Currently in our models, **agriculture (cropland and pasture/hay)** on federal lands is shifted via a spreadsheet from federal lands to state lands, and then it's the states responsibility, and if the federal agencies want to work with the states to share BMP information then that falls between them.

But for the other land uses (**septic**, **harvested forest**, **and construction**), we just assume in the model they are not happening on federal properties and will not consider them, but we are mapping them so we do know they happen.

If there is no appetite for reporting information, then maybe instead of going completely with the status quo of Phase 6 where only agriculture (cropland and pasture/hay) are moved to state responsibility, maybe we move mapped construction and harvested forest to state responsibility. That way we try to not to ignore more sources of pollution that we have in Phase 6.

Liz Dawson, USFS: As long as the BMPs are counted to me it doesn't matter who they are counted for. It was nice to have credit for BMPs, but as long as they are being counted that would be the goal.

Auston Smith, EPA: For some of these sectors, they are not being counted, so in this proposal, if construction and harvested forest were moved to state responsibility, that would mean those categories wouldn't get lost. However, it seems like this would go back to the jurisdictions for their approval because it would change their load, correct?

Peter Claggett, USGS: I suppose it would. We're not talking about a ton of acres, we're talking about 2000+ for forest and construction respectively, etc. Essentially this would treat construction and harvested forest in the same way agriculture (cropland and pasture/hay) is treated on federal facilities. This way there would be no additional responsibilities on the federal agencies and it would make the model more accurate. If federal agencies are implementing BMPs, they can report that to the states so they

can be counted. The only caveat is that the federal agencies wouldn't be recognized for implementing the BMPs by the Bay Program, only the state would. This may be the most straightforward way to report given how complex direct reporting may be for the federal agencies.

Rene Senos, NPS: The other issue during the last conversation that came up was how this would increase the load requirements for federal agencies, so that's one question I want to loop back to. The other had to do with the assumptions that might be made with the federal agencies providing data. For instance, we don't harvest forest for NPS so what would happen if a default rate was applied, and the other comment would be on the lift this would require.

Auston Smith, EPA: Good points, to the first one, for the presence of forests I don't think there was a proposed method for how that would be broken out, whether it would be allocated to agencies outside of federal agencies, it hasn't been ironed out, it gets complicated because those land uses change each year.

In regards to concerns with the corresponding loads rising, agriculture would result in higher loads, while septic and harvested forest would be less so, but going back to what Peter was saying, if there is not an appetite to pursue that, then maybe there is a discussion where those lands be aggregated to the state, then it would be on the federal agencies to report to the states who then would report to NEIN.

My question back to you is, even if we were to move forward with any of these load sources with the understanding that breaking out the load allocations and the methodology would still need to be discussed, would there be appetite or do you think this is too big of a lift?

Rene Senos, NPS: We have two pieces floating around, the federal boundaries data layer, and then also not knowing how these impacts will impact loads and then how the methodology would be. For instance, NPS typically does not harvest forest lands. The only time we would do this is by converting forest lands to native meadow or wetland conditions. I wanted to question the proposed solution which would apply a default rate if we don't report.

Katie Brownson, USFS: I don't think if you're selectively harvesting that it would be captured in the model, the most would be those larger harvesting. The proposed solution that is listed in the <u>issue paper</u> (page 6) was an example of what we do on the state level, but if we did it on the federal facility level we would need to parse out the agencies that don't harvest and re-evaluate a new default rate that would be appropriate.

Rene Senos, NPS: Do you have documentation to share with any of these four categories that there is X number of agriculture, etc.?

Peter Claggett, USGS: Yes, referring to Table 2 in the <u>issue paper</u> (page 10-12), we have mapped the number of acres in these land uses/sources in the blue column. For the 292 acres under NPS, this could be a range of possibilities that the model is picking up, such as an area that had trees and now doesn't and appears to be regenerating or it could be wooded areas that were cleared and appear to us as harvested forest based on our decision rules in the model.

Rene Senos, NPS: Could you figure out where these locations are?

Peter Claggett, USGS: Yes, we could figure it out and get that to you but there isn't a public viewer.

Arianna Johns, VA DEQ (in chat): Could this 292 acres of "harvested forest" be a result of forest fires?

Peter Claggett, USGS (in chat): Yes - could be

Rene Senos, NPS: Back to the construction category, we already are doing strict storm water reporting as per jurisdictional requirements. What do the 491 acres of construction for NPS in this table represent? Are they different from the jurisdictional requirements, if so, why are we adding additional categories?

Peter Claggett, USGS: I'm not aware there are additional reporting categories for construction over E&S and what the local jurisdictions have. I know for some jurisdictions even where BMPs are applied to almost all their construction lands, there is still an associated load and although it is lower it's still worth accounting for. For this case, there may be some blanket assumptions that the states use in regards to BMPs on construction land that we could draw from for construction on federal facilities, which would still be an improvement over what we're doing now which is pretending it doesn't exist.

Angela Jones, DoD: For the construction acres that are completed, at what point would they be removed from that category?

Peter Claggett, USGS: I think it's only presumed to exist for a year because states report an annual amount which in turn has BMP assumptions built into that. If the states don't report an annual amount, then the model applies an estimate of

impervious change x 1.29 which means if there are a 100 acres of new impervious on a military base, we presume that 129 acres were at some point in the past year in a construction phase. For the following year, we directly update it for the states that report, but if they don't report it then we will refer to the mapped land use data.

Moving into the future, we don't have mapped data that comes out every year, it comes out every 4 years at high resolution. Right now, we don't model urbanization on federal facilities because they are unique compared to elsewhere in the states because assumptions such as jobs and population growth don't drive change in the same way on federal properties like DoD. So for future years, there wouldn't be a load on federal facilities until we get the high-resolution data to map the change which would mean there would be a lag.

Angela Jones, DoD: And in the gap of time the loads would remain the same?

Peter Claggett, USGS: Well we would have to make a partnership rule which could look like many things for example maybe the construction load goes to 0 until we get new data or maybe some average amount that was under construction over the past eight years is the default. That would be a decision from this group to the WQGIT.

Rene Senos, NPS: Some of these numbers are striking to me, the federal agencies would need a way to cross check the data that's being presented. Can we tell where you are drawing this data from, for instance in the category for construction, I can't think of where the 491 would have come from.

Peter Claggett, USGS: I could create a GIS layer using Coral's new federal facility layer that assesses at the facility level and aggregates it for the spreadsheet. What I'm not sure about is whether I have polygons of the NPS boundaries unattributed with any other information for the facilities, but you could see where they are in the watershed and zoom in rather than having the details name of the facility to avoid any breach of a security protocol.

Liz Dawson, USFS: For the 51 acres of harvested forest for FWS, I'm not aware of them doing any harvested forest, I wouldn't have any idea to what site it was referring to, there would be no way of identifying the site to see.

Peter Claggett, USGS: So for you all to be comfortable with the values of this table, and potentially having these loads become responsible to the state, you would want to see it at the facility level to cross walk it with what you know is happening at the facilities?

Auston Smith: That's what I'm hearing as well, Peter. Would the FFWG be comfortable with making a decision on any of these sectors in August if they had that viewer to look at beforehand?

Liz dawson, USGS: I'm not getting sense that the group feels it's realistic to adopt any of these, I think it would be nice to count our BMPs, and it would be a step overall if the states have the option to report these BMPs, maybe we should discuss it with that perspective.

Auston Smith: Maybe approaching this the way Peter was proposing at the beginning might be the way by allocating federal land uses of agriculture, construction, and harvest forest to the states for what they report.

Peter Claggett, USGS: Yes, on a completely voluntary basis, this would be the most accurate way to capture that without adding reporting loads on the federal agencies.

Auston Smith, USGS: So maybe the next step would be for your team, Peter, to provide a data review layer.

Angela Jones, DoD: Just to be conservative from the DoD standpoint, I don't want the DoD information out there and would need approval on this.

Peter Claggett: I can section out the DoD data and send that separately to you and then for the rest of the agencies, I can send the rest of the data review to the agencies in the workgroup.

Rene Senos, NPS: I know you're pushing for an August decision, I'm curious if you will finalize the land boundaries piece of this, there were discrepancies that resulted in reduced acreage, so wouldn't you have to recalculate those acres first?

Peter Claggett, USGS: Yes, I can get the layer from Coral to recalculate the numbers before redoing the viewer.

Auston Smith, EPA: Thank you Peter, Coral, and everyone for this. It sounds like there is little to no appetite for allocating these load sources/uses to federal agencies, but there is appetite to continue the conversation and take a deeper dive at the data that Peter will provide, specifically for construction and harvested forest, to see if they could be reported at a more robust level at the jurisdiction level for a more complete model as some sort of middle ground. Any more questions?

Arianna Johns, VA DEQ (in chat): Virginia has sent out an email to all our BMP reporting partners for our yearly warehouse webinar, and we got a large swath of bounce backs from Federal employees that no longer work for the various agencies. How can we get a list of the federal partners and who will be reporting the BMPs to our warehouse this year?

Auston Smith, EPA: I can work with Olivia and Marilyn to get you an updated list.

Alicia Ritzenthaler, EPA (in chat): I'd also be interested in that list if you're able to share with DC as well. Thanks!

Rene Senos, NPS: We've had a lot of attrition in our workforce, so I'm not sure if we'll have the capacity to review these new pieces of information. It sounds like you want us to review in July to provide comments in August, I don't think that's realistic.

Auston Smith, EPA: If we were to move forward with an approach like this, it's my understanding it would need to fall under the current phase 7 timeline in August, but I understand the concern with things feeling rushed will need to be checked in with my leadership about whether we can go past August.

Angela Jones, DoD: Kevin mentioned he sent out the credit reports to the jurisdictions and EPA, and he noticed there were NEIN entry errors between the DoD agency code and there was some loss of credit. We will address some maintenance gaps, but he just wanted to mention that about corrections in the NEIN database. He also wanted to ask if there were any template changes from the jurisdictions.

Auston Smith, EPA: I don't believe any templates have changed, I did see the emails from Kevin and saw that maybe Pennsylvania was outstanding.

Tyler Trostle, PA DEP: I handle the Pennsylvania reporting. There are no changes to the template, but we do have a data reporting meeting on Thursday that I can forward to you, Angela, if Kevin will still be OOO.

Auston Smith, EPA: Closing out today's discussion, I will see if we can move beyond the August timeline and then you all will hear from us once Peter is able to provide that supporting viewer.

ACTION: Peter Claggett will provide an updated viewer to the FFWG (with a separate one containing DoD data sent to DoD individually) showing which mapped acres are attributed to which federal agency.

		ACTION: Auston Smith, Olivia Devereux, and Marilyn Yang will provide an updated list of the federal BMP reporting partners to Arianna Johns and Alicia Ritzenthaler.
		ACTION: Auston Smith will check with the CBPO leadership about the feasibility of extending this decision past the August Phase 7 timeline.
		POST MEETING UPDATE: Following the meeting, an email from Peter Claggett was shared with the FFWG on 6/25/25 providing an update to his reporting suggestion of treating "harvested forest" and "construction" land uses on federal lands similarly to how cropland and pasture are currently treated by 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-CBPO leadership, it was decided not to move forward with this suggestion given the various challenges to implement such changes.
		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 identified challenges, however, the CAST team recommends that we maintain the status quo and not bother with a vote.
		Please refer to the language in Peter Claggett's <a href="mailto:update email">update email</a> for more details and context. If you have any questions or concerns with this recommendation, please contact Peter Claggett ( <a href="mailto:pclagget@chesapeakebay.net">pclagget@chesapeakebay.net</a> ), Auston Smith ( <a href="mailto:smith.auston@epa.gov">smith.auston@epa.gov</a> ), and Marilyn Yang ( <a href="mailto:myang@chesapeakebay.net">myang@chesapeakebay.net</a> ).
11:30 – 11:35	V. Wrap-up and Conclude  Next FFWG Meeting: August 12th, 2025  (10:00am-12:00pm)	