

Strawman 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 proposal for consideration at the November 13 Management Board meeting and the December Principals' Staff Committee meeting.
- 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 Default Approach:

1. **EPA requests the Federal Leadership Committee (FLC) to endorse** the 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.
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 We expect that states with a limited number of federal facilities/lands in the Bay watershed will likely put all of them on their list.
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 (within 30 days).³
6. **Upon receipt of the facilities' land use data, jurisdictions determine appropriate 2017 and 2025 targets** 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** 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. **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.

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.