



CHESAPEAKE BAY FOUNDATION
Saving a National Treasure

Memorandum

To: Dinorah Dalmasy, Chair, Water Quality Goal Implementation Team (WQGIT)
James Davis-Martin, Chair, WQGIT

From: Beth McGee, At-Large WQGIT Member, Chesapeake Bay Foundation

Subject: Proposal to Eliminate Numeric Goals for Best Management Practices (BMPs) from Two Year Milestones

Date: October 4, 2019

Thanks for the opportunity to provide the Chesapeake Bay Foundation's (CBF) perspective on the subject proposal that is being forwarded to the Management Board. In addition, to the "Cons" presented in the discussion document (September 25, 2019 version), we offer the following comments.

Numeric BMP commitments are one way to quantitatively track progress toward the achievement of programmatic milestones. How can jurisdictions judge the effectiveness of their programmatic commitments without attempting to set some quantifiable implementation goals that would result and assessing progress toward meeting them?

Numeric BMP commitments provide the needed level of accountability to ensure progress is continued. Without these numeric goals, it's like saying, "I'm going to lose 20 pounds by exercising more and eating less," -- but not laying out a specific plan for *how much* you will exercise and *how many* calories you will cut per day.

For planning purposes, understanding how each pollution source sector is progressing is critical to achieving and maintaining the pollution caps. Too many states are overachieving on wastewater and underachieving elsewhere. And, while estimates of pollution loads by sector will provide some insight, even more detailed information is garnered from assessing BMP goals. By assessing progress, or lack thereof, toward BMP implementation, jurisdictions have the information needed to adaptively manage and make up for shortfalls by accelerating implementation of other practices.

Numeric BMP goals are not affected by updates to the Chesapeake Bay Watershed Model and as such estimates of progress will not be affected by changes to the model. We recognize that verification and other factors are influencing reported BMPs, but this is not a reason to jettison them as part of the milestone commitments.

Lastly, we are concerned about the effect of this decision on the numeric milestones needed to address climate change.

In summary, we believe that progress tracking, public accountability, transparency, and adaptive management ability are greatly facilitated by BMP milestone commitments. We respectfully request that you keep this key accountability measure intact. Thank you for your consideration of this request.