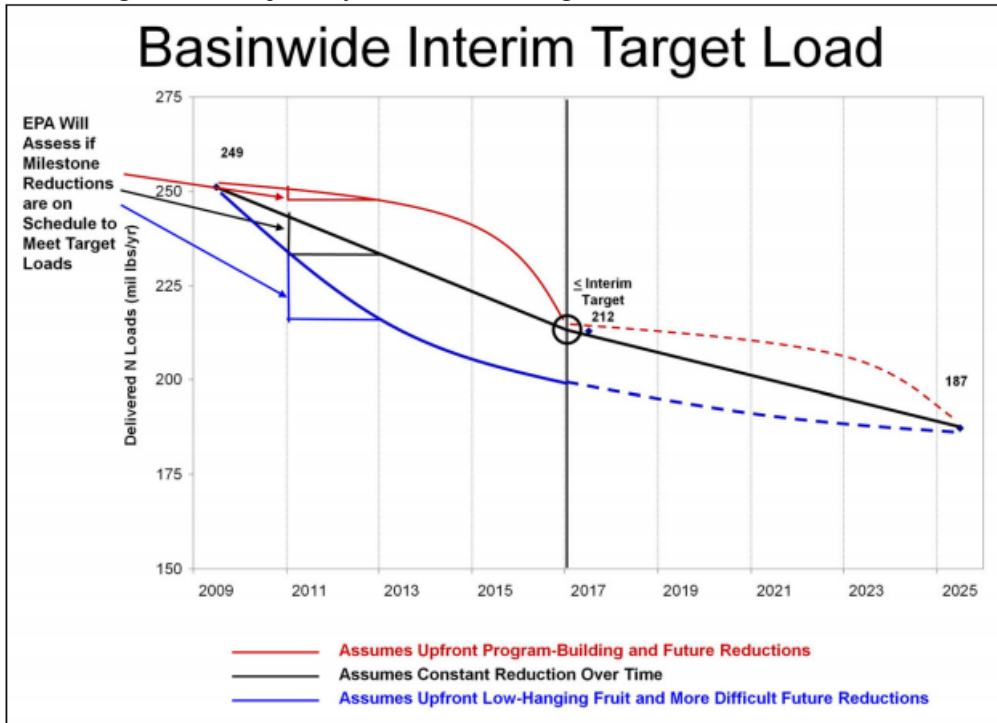


**Recommendation to the CBP Management Board regarding the development of numeric 2-year milestones under the Chesapeake Bay TMDL Accountability Framework**

Jurisdictions and federal agencies will be held accountable to their 2-year estimated numeric load reductions 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. EPA will provide the jurisdictions and federal agencies with the straight-line trajectory projection (including sector growth projections) at the beginning of each 2-year milestone period. Using this approach, the expectation for jurisdictions and federal agencies to develop Chesapeake Assessment Scenario Tool or “CAST” scenario estimated numeric 2-year milestones under the Chesapeake Bay Total Maximum Daily Load (TMDL) Accountability Framework would be voluntary.

The partnership’s expectation that jurisdictions and federal agencies develop programmatic milestones will remain. If a jurisdiction or federal agency so chooses, numeric 2-year milestones (i.e., full CAST scenario) could be developed for the purpose of following an alternative (i.e., non-straight-line) trajectory to 2025. See Figure 7-1 (below) of the TMDL document.



Source: USEPA 2009c

**Figure 7-1. Relationship between WIPs and 2-year milestones.**

In its evaluation of the Phase 3 Watershed Implementation Plans (WIPs), EPA identified concerns in jurisdictions that have significant gaps in meeting their planning targets or have committed to high rates of BMP implementation in their WIPs. These concerns should be addressed through development of specific and detailed numeric targets for BMP implementation in selected source sectors. In lieu of voluntarily developing CAST estimated numeric milestones and to improve the link between actual implementation and programmatic commitments, jurisdictions and federal agencies should include 2-year numeric BMP implementation targets as part of their programmatic milestones for those BMPs identified in EPA’s evaluations of the jurisdictions’ final Phase III WIPs. These implementation targets

should be tied directly to development of programs and implementation rates for practices proposed in their Phase III WIPs, that are key to achieving the 2025 goals. Additional measurable metrics like dollars committed and number of staff hired could also be included.

In addition to the biennial evaluations of the two-year milestones, EPA will continue to conduct its annual progress and verification assessments based on the jurisdictions' submission of BMP and wastewater data. This information represents the BMPs and control technologies that are tracked, verified, and reported as implemented each year. EPA reviews all BMP data that are submitted, not just those BMPs identified through the two-year milestone process, and provides these assessments to the jurisdictions annually.

Sector-scale numeric progress information will continue to be made available by the CBP partnership through established accounting metrics (e.g., annual progress evaluation) and may be used by EPA as another measure of progress toward the 2025 goals.