

EPA EVALUATION OF THE CONOWINGO WATERSHED IMPLEMENTATION PLAN STEERING COMMITTEE'S 2026-2027 MILESTONE COMMITMENTS

Executive Summary

The Chesapeake Bay Program (CBP) partnership established the goal to implement and maintain practices and controls to reduce nitrogen, phosphorus and sediment in order to achieve the applicable water quality standards, as described in the [Chesapeake Bay Total Maximum Daily Load](#) (Bay TMDL). The CBP partnership, including the seven jurisdictions (Delaware, the District of Columbia, Maryland, New York, Pennsylvania, Virginia, and West Virginia) and the U.S. Environmental Protection Agency (EPA), agreed to develop and implement a framework for holding each partner accountable for reducing nitrogen, phosphorus, and sediment loads to meet the [CBP partnership water quality targets](#).

EPA has evaluated the Conowingo Watershed Implementation Plan (WIP) Steering Committee's draft 2026-2027 milestone commitments for the CBP partnership and the public in accordance with its oversight role and responsibility under the CBP partnership's accountability framework. The next evaluation will assess the Conowingo WIP Steering Committee's 2024-2025 milestone progress, final 2026-2027 milestone commitments, and numeric progress toward meeting its water quality targets through implementing the Conowingo WIP and two-year milestones. As detailed in the [EPA Expectations for the Implementation of the Conowingo WIP Phased Approach](#), based on this next evaluation, EPA will provide recommendations to the CBP partnership on a path forward for the Conowingo WIP (i.e., whether this phased approach should continue until a date certain or whether an alternative path should be pursued).

Background

The CBP partnership has been using two-year milestones since 2009 to help identify shorter term actions to implement the WIPs and document progress toward the partnership's water quality targets. In January 2025 the Principals' Staff Committee (PSC) approved [an updated approach to the two-year milestones](#) to streamline the milestone commitments and milestone progress reporting, starting with the 2026-2027 milestones. Jurisdictions, the Conowingo WIP Steering Committee, and Federal Agencies (collectively referred to as Milestone Partners) are expected to identify high-level programmatic actions they plan to implement during the 2026-2027 milestone period to maintain or accelerate implementation toward meeting the water quality targets through 2030. By December 31,

2030, the CBP partnership will update its modeling tools, approve updated planning targets, and develop or amend WIPs designed to meet these updated targets by 2040.

In December 2017, the PSC agreed to develop a separate and collaborative Conowingo WIP and associated two-year milestones that would outline the programmatic and numeric commitments that would be taken to reduce the adverse water quality impacts to the Chesapeake Bay resulting from Conowingo Dam infill. At its July 19, 2022, meeting, the PSC reached consensus that the Susquehanna jurisdictions of Pennsylvania, New York, and Maryland represented by the Conowingo WIP Steering Committee could address the Conowingo nutrient loads through the actions WIP outlined in the WIP using a phased approach that extends beyond 2025. EPA established [expectations for this phased approach](#), specifying the numeric and programmatic implementation elements to be addressed by 2025—the end of Phase I—through the Conowingo two-year milestones and/or an amended Conowingo WIP. The Conowingo WIP Steering Committee committed to implement practices to reduce 25 percent of the nutrient load attributable to Conowingo Dam infill (1.675 million pounds of nitrogen and 0.07 million pounds of phosphorus) by 2025.

EPA committed to conduct an evaluation in 2026 of the Conowingo WIP Phase I implementation to assess whether sufficient programmatic and numeric progress has been made and to provide a recommendation to the PSC on a path forward (i.e., whether an alternative path should be pursued).

Progress and Monitoring

In addition to updating tools, targets, and WIPs, the CBP partnership is also exploring ways to better explain progress, using a combination of modeling results and monitoring data. Although this evaluation of the *draft* 2026–2027 milestones will not review modeled or monitoring information, the final evaluation will include a detailed review of load reductions and further descriptions of monitoring data.

EPA encourages each of the Milestone Partners to review and assess both the available real-world monitoring data and the most recent modeling results (Progress Year 2024) to inform the priority strategies and actions identified in the final 2026-2027 milestones. Milestone Partners can use the [Chesapeake Assessment Scenario Tool \(CAST\)](#) to access the latest modeled progress results and build scenarios estimating future nitrogen, phosphorus, and sediment loads. The CBP partnership's Chesapeake Bay Nontidal Water Quality Monitoring Network, [supported by twenty-five groups](#) representing local, State, and Federal agencies, including the EPA, the U.S. Geological Survey (USGS), the Susquehanna

River Basin Commission (SRBC), and the Bay jurisdictions, generates water quality monitoring data in freshwater rivers and streams throughout the watershed that is analyzed by USGS to provide monitoring-based information about the amount of nitrogen, phosphorus, and sediment entering the Chesapeake Bay through its nontidal rivers. These data inform watershed management by providing information on which to base restoration and conservation actions. The most recent results (www.usgs.gov/CB-wq-loads-trends) for the full 123-station network over the long-term 1985-2023 and short term 2014-2023 were published in March 2025. Long-term 1985-2024 and short term 2014-2024 results for the nine River Input Monitoring stations along the fall line were published in July 2025.

Additionally, the [Monitored and Expected Total Reduction Indicator for the Chesapeake \(METRIC\) tool](#) can be used to compare observed water-quality trends with expected outcomes based on management actions, helping to clarify progress and guide priorities.

Future EPA evaluations will continue to stress the importance of using both modeling and monitoring information to target water quality actions such as milestone commitments to maintain and accelerate meeting the partnership's water quality targets. This integrated approach supports more accurate assessments and reduces misinterpretation, ultimately aiding partnership efforts to maintain and accelerate restoration and conservation efforts to achieve the water quality targets.

Feedback on 2026-2027 Milestone Commitments

Under the updated milestones framework, there are two categories of milestone commitments: core commitments and sector initiatives. Core commitments are the activities or actions of Milestone Partners that sustain or accelerate implementation priorities identified in the milestone narratives of the optional [milestone commitments template](#), while sector initiatives are the *innovative* actions introducing new approaches that sustain or advance implementation priorities that do the same.

This evaluation reviews how milestone commitments support the identified priorities and acceleration of implementation. When EPA evaluates milestone [progress in 2028](#), EPA will only evaluate progress in meeting the core commitments. EPA will recognize the innovative actions but will not evaluate their outcomes, to encourage innovation and creativity in achieving nutrient and sediment reductions.

EPA reviewed the Conowingo WIP Steering Committee's draft 2026-2027 milestone commitments, assessing the core commitments and sector initiatives in context of how

well they align with the priorities described in the narrative summary and the Conowingo WIP, and offers the following feedback.

Core Commitments

General Comments

- EPA commends the Conowingo WIP Steering Committee for quantifying the anticipated nitrogen and phosphorus reductions from implementation activities.
- EPA commends the Conowingo WIP Steering Committee for revising the format of its milestone commitments to align with the PSC directive to streamline the 2026-2027 milestone documents. Compared with its 2024-2025 milestones, these 2026-2027 milestone commitments offer a clearer picture of the Conowingo WIP Steering Committee's objectives, expected outcomes, responsible parties, and funding sources for milestone activities.
- The Conowingo WIP Steering Committee committed to implement practices to reduce at least 25 percent of the nitrogen and phosphorus reductions identified in the Conowingo WIP, or 1.675 M lbs/year and 0.07 M lbs/year of phosphorus, by 2025. Milestones 1-3 anticipate reductions of 245,300 pounds of nitrogen and 13,720 pounds of phosphorus annually over the two-year period. This represents 14.6 percent of the short-term nitrogen reduction goal and 19.6 percent of the short-term phosphorus reduction goal, respectively. The type and scale of the activities described in the milestone commitments do not provide confidence that the 25 percent reduction goals will be achieved soon. EPA recommends the Conowingo WIP Steering Committee outline additional actions that it will take to accelerate implementation of BMPs and secure dedicated funding sufficient to implement the Conowingo WIP and achieve the necessary load reductions.
- Please ensure that all acronyms are spelled out with the first mention (e.g., SRBC, MTT).

Sector Initiatives (i.e., innovative actions)

General Comments

- EPA commends the Conowingo WIP Steering Committee's commitment to support Plain Sect outreach and watershed coordinator positions to strengthen engagement with agricultural producers and partner organizations, which could help advance project implementation in target watersheds.
- EPA supports the Conowingo WIP Steering Committee's plan to evaluate new and innovative BMPs as viable BMPs and to complete the Conowingo Reservoir Modeling Study. As appropriate, please coordinate with the EPA Chesapeake Bay Program Office regarding technical guidance.