

EPA EVALUATION OF PENNSYLVANIA'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 Pennsylvania'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 Pennsylvania's 2024-2025 milestone progress, final 2026-2027 milestone commitments, and numeric progress toward meeting its water quality targets through implementing its amended Phase III Watershed Implementation Plan (WIP) and two-year milestones.

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.

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.

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 Pennsylvania'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 Pennsylvania's narrative summary and amended Phase III WIP, and offers the following feedback.

General Comments

- EPA commends Pennsylvania for revising the format of its milestone commitments to align with the PSC directive to streamline the 2026-2027 milestone commitments.
- EPA commends Pennsylvania for identifying the Pennsylvania Department of Environmental Protection (PADEP's) strategic priorities and reflecting those priorities in the narrative summary.
- EPA recommends Pennsylvania clarify the baselines it will use for milestone outcomes that include "increases" – i.e., how an increase is being measured or determined and by what starting point.
- Pennsylvania included bulleted lists of activities for each milestone below the milestone commitments template table. Several of these activities read like milestones and should be considered for inclusion in the table.
- In order to combine the detailed lists of activities with the proposed milestones, Pennsylvania could consider grouping milestones under some sub-categories. Sub-categories do not need to align with sectors.

Core Commitments

General Comments

- The narrative summary for the core commitments does not match the proposed core commitment milestones. The narrative for the core commitments aligns more with the sector initiatives section. It would be helpful to include more detail in the introductory narrative about Pennsylvania's decision to focus on programmatic activities related to information management and capacity-building rather than direct implementation.

Agriculture Sector

- EPA commends Pennsylvania for the development of the Nonpoint Source Management Plan referenced in Milestone 7. This is a comprehensive action plan intended to maintain or increase implementation levels as partners work to achieve the Phase III WIP targets by 2030.
- EPA anticipates that Pennsylvania will continue to maintain or accelerate implementation across the watershed to close the gap in meeting its water quality targets even though the submitted milestones do not identify specific nutrient reduction activities such as new BMP implementation, or progress verification in the agricultural sector.
- EPA recommends that Pennsylvania consider including a target for increased implementation of conservation tillage as a result of implementing the Conservation Tillage Dashboard in Milestone 2.
- EPA recommends Pennsylvania continue to seek opportunities to accelerate implementation of priority agriculture BMPs to target nonpoint sources of nitrogen, phosphorus, and sediment.

Developed Lands (Regulated and Unregulated) Sector

- Pennsylvania included a milestone for a Chapter 102 Erosion and Sediment Control BMP mapping portal. EPA anticipates that Pennsylvania will continue working to finalize the update to the BMP Manual during the 2026-2027 period.
- EPA recommends Pennsylvania continue to seek opportunities to reduce nutrient and sediment loads from the developed sector.

Wastewater and Septic Sector

- EPA commends Pennsylvania for including a milestone for workforce development. Workforce development is a critical step for sustaining pollutant reductions achieved in the wastewater sector.
- EPA recommends a milestone for PADEP's technical assistance program (TAP) to continue to support wastewater treatment plant (WWTP) optimization efforts.

Trading and Offsets

- EPA anticipates that Pennsylvania will maintain its commitment to using the Regulatory In-lieu fee and Bank Information Tracking System (RIBITS) to serve as a tool for nutrient trading and continue work on the associated website roll-out.

Sector Initiatives (i.e., innovative actions)

General Comments

- EPA recommends that Pennsylvania consider reworking the supplemental bullets into a separate introductory narrative for the sector initiatives milestones to provide some background and context.