

EPA EVALUATION OF THE DISTRICT OF COLUMBIA'S 2024-2025 and 2026-2027 MILESTONES

Executive Summary

The Chesapeake Bay Program (CBP) partnership established a goal to implement and maintain practices and controls to reduce nitrogen, phosphorus, and sediment in order to achieve 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 interim water quality targets](#).

In that role, EPA evaluated the District of Columbia's (the District) progress toward attaining nitrogen, phosphorus, and sediment goals at the state and state-basin level and progress toward meeting sector-specific programmatic commitments for the 2024-2025 milestone period. This evaluation also provides an assessment of the final 2026-2027 commitments to maintain and accelerate progress over the next two years.

In reviewing the District's final programmatic progress for the 2024-2025 milestones, the 2025 numeric progress, and the final 2026-2027 milestone commitments, EPA identified sector-by-sector strengths as well as areas for improvement. According to the data provided by the District for the 2025 progress run, the District achieved its [statewide interim target](#) for nitrogen, phosphorus, and sediment. EPA stands ready to assist the District with implementing its 2026-2027 two-year milestone commitments.

Some notable strengths identified in this evaluation of the District's 2024-2025 milestone progress and the final 2026-2027 milestone commitments include:

- The continued support for existing and commitment to expanding the RiverSmart Schools and Homes projects helping to reduce stormwater runoff within the District.
- A strong foundation and continued efforts to foster engagement with stakeholders via outreach meetings, and forums to provide educational opportunities for improving water quality.
- The construction of projects to address combined sewer overflows, combined with the expansion of markets for stormwater retention crediting.

Some key areas that EPA expects the District to address in the 2026-2027 milestone period and beyond include:

- Continue to seek best management practice (BMP) implementation in the developed (urban/suburban stormwater) sector, especially because this sector shows growth in loads watershed-wide.

- Make continuous updates to the reporting and quality assurance and quality control (QA/QC) of data to relevant EPA personnel.
- Complete construction projects to address combined sewer overflows throughout the District.

Background and Looking Forward for Future Reviews of Progress

Since 2009, the CBP partnership has used two-year milestones to identify shorter-term actions for implementing Watershed Implementation Plans (WIPs) and to document progress toward the partnership's water quality targets. In January 2025, the Principals' Staff Committee¹ (PSC) approved an updated approach to the two-year milestones to streamline both the development of milestone commitments and the reporting of progress, starting with the 2026-2027 milestone cycle. Under this updated approach, 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 interim water quality targets.

At the September [2024 Management Board² meeting](#) the CBP partners agreed to define the "water quality targets" as the Interim Targets and Conowingo Targets.³ The Interim Targets are the Phase III Planning Targets factoring in 2025 changing environmental conditions and Unaccounted Additional Loads (UALs)⁴. In the most recent [Chesapeake Bay Watershed Agreement](#), the CBP partnership agreed that through 2030, the signatories will continue to accelerate completion of all water quality targets through implementation of Chesapeake Bay Watershed Implementation Plans, two-year milestone commitments and other innovative strategies to achieve and maintain reduced levels of nitrogen, phosphorus and sediment. This evaluation and future evaluations through 2030 will measure progress toward the water quality targets using Chesapeake Assessment Scenario Tool (CAST 2023), unless amended by a future CBP partnership decision.

Concurrently, the CBP partnership is updating to the Phase 7.0 suite of modeling tools, which are expected to be completed and approved by the partnership in 2028. By December 31, 2030, the CBP partnership committed to revise the planning targets approved by the PSC for nitrogen, phosphorus, and sediment, incorporating the latest watershed modeling, monitoring data and research findings, and to develop new or amended WIPs to meet the updated targets by 2040.

¹ As of July 2026, the PSC name changed to the Policy Steering Committee.

² As of July 2026, the Management Board was dissolved as part of the revised Governance and Management Framework.

³ The PSC approved a phased approach for what can be achieved at Conowingo by 2025. Conowingo has a separate WIP and milestones to meet those targets.

⁴ The UALs are equal to the increased load from cumulative Phase 6 CAST updates to model inputs that occurred after the Phase 3 Planning Targets were set in 2018. Accounting for the UALs balances the load increases from the model changes. Additional reductions necessary to account for Conowingo infill are not included.

In addition to updating tools, targets, and WIPs, the CBP partnership is exploring ways to better explain progress and the changing conditions of the Chesapeake Bay, using a combination of modeling results and 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 2025) to inform the priority strategies.

Detailed Evaluation of Overall Load Reductions and Source Sectors

Load Reduction Review – Statewide and by Major River-Basin⁵

Each year, jurisdictions in the CBP partnership report the BMPs they have installed, tracked and verified, along with the pollutant load reductions from wastewater treatment plants. When evaluating the District of Columbia's 2024-2025 milestone implementation, EPA simulated nutrient and sediment loads using CAST-23⁶ and wastewater discharge data reported by the District of Columbia and compared those loads to its water quality targets.

According to the data provided by the District for the 2025 progress run, the District achieved its statewide and state-basin targets for nitrogen, phosphorus, and sediment for the Potomac basin. EPA expects the District to maintain BMP implementation levels to ensure progress is sustained.

Table 1. Loads and Targets for the District based on CAST-23 and reported wastewater data.

Pollutant	2009 Progress Loads (M lbs/year)	2025 Progress Loads (M lbs/year)	Water Quality Target Loads (M lbs/year)	Percent of Target Achieved
Nitrogen	<i>2.76</i>	<i>1.47</i>	<i>2.42</i>	<i>100%</i>
Phosphorus	<i>0.07</i>	<i>0.04</i>	<i>0.13</i>	<i>100%</i>
Sediment	<i>44</i>	<i>35</i>	<i>42</i>	<i>100%</i>

The summary progress from the CBP partnership's modeling tools for 2009 and 2025 incorporate BMP credit duration. The CBP partnership decided to remove reported BMPs from the model simulation at the end of their established credit durations unless verified by the state as inspected and continuing to function as designed. Verification is labor intensive but critical for ensuring practices are implemented and reductions are credited. The CBP partnership is

⁵ Major river-basin refers to the eight major river basins draining to the Chesapeake Bay, some of which are shared by more than one Bay jurisdiction. For example, the Susquehanna River is shared by New York, Pennsylvania, and Maryland; Pennsylvania-Susquehanna refers to the Pennsylvania portion of the river. The phrase "major river-basin" is interchangeable with "state-basin" in this document.

⁶ CAST-23 is part of the Phase 6.0 suite of modeling tools for the Chesapeake Bay.

exploring opportunities for new technologies and systems to streamline verification. The District of Columbia is expected to provide detailed programmatic milestones to support these BMP implementation targets. In the sector-specific sections below, EPA provides its evaluation of these programmatic milestones and the connection to increased implementation.

Monitoring

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 2025) to support meeting 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.

Source Sector Review

Urban/Suburban Stormwater

2024-2025 Milestone Achievements

- Achieved 327 acres managed with stormwater BMPs during the 2024-25 milestone period.
- Completed assessment for updating the District's stormwater regulations and rulemaking process and published updates to the Stormwater Management Guidebook consistent with regulation changes.
- Provided routine maintenance to 1,441 green infrastructure BMPs on District-owned property.

- Completed Phases 2 and 3 of improvements to the Green Infrastructure Maintenance database.
- Published new regulations that prioritize use of High-Impact Stormwater Retention Credits in 2025. These regulations will promote water quality improvements by incentivizing new, voluntary green infrastructure projects in the Municipal Separate Storm Sewer System (MS4) area of the District.
- Completed the Park Drive stream and gully restoration project in 2024 and the Linnean gully and outfall restoration project in 2025, totaling 1,500 feet of restoration.
- Planted 16,052 trees in the 2024-25 milestone reporting period.
- Completed implementation of the Stormwater Retention Credit (SRC) Aggregator Startup Grant Program in 2025.
- Completed 1,854 audits for the RiverSmart Homes programs for green infrastructure practices.
- Completed two (2) schoolyard greening projects, fixed one LID stormwater retrofit project, and completed stormwater retrofits at two recreation centers.

2024-2025 Milestones Not Achieved

- None.

2026-2027 Milestone Strengths

- Commits to manage 470 acres in the District's MS4 area with runoff reduction stormwater BMPs.
- Commits to complete 1,000 linear feet of stream restoration.
- Commits to plant an average of 7,700 trees in the MS4 area as an annual benchmark.
- Commits to complete approximately 6 stormwater retrofits in park and school parcels and assess and maintain 6 previously installed RiverSmart School sites. Additionally, commits to perform 2,000 RiverSmart Homes assessments.
- Commits to engage stakeholders by convening education and outreach meetings and forums.

Key Areas to Address in the 2026-2027 Milestone Period and beyond

- Focus efforts on improving the sign-up rate for the RiverSmart Homes program in order to improve assessment numbers.
- Continue to seek opportunities to reduce nutrient and sediment loads from the developed sector (urban/suburban stormwater), because this sector continues to show growth in loads across the watershed.

Wastewater Treatment Plants and Onsite Systems

2024-2025 Milestone Achievements

- Completed restoration at Northeast Boundary Tunnel construction sites.
- Began the design-build contract for construction of the Potomac River Tunnel.

2024-2025 Milestones Not Achieved

- None.

2026-2027 Milestone Strengths

- The District of Columbia is on track with construction of two sites designed to reduce the volume of Combined Sewer Overflows and the reporting of point source data to the CBP partnership.

Key Areas to Address in the 2026-2027 Milestone Period and beyond

- Continue reporting Blue Plains data while looking for ways to improve the reporting and QA/QC process.

Growth, Offsets, and Trading

2024-2025 Milestone Achievements

- Continued implementation of the SRC Price Lock Program, including support for developers to purchase from the SRC Price Lock Program, releasing Fall 2023 awards in Winter 2024, and adding incentives for developers. Three projects were signed purchase or subsidy agreements, retrofitting approximately 30 acres with green infrastructure (GI).
- Continued implementation of the SRC Aggregator Startup Grant Program. The program is now part of the District's Pathways to Success initiative, launched in June 2025. As part of Pathways, three new Startup Grants were awarded, providing technical and outreach support for GI projects that generate SRCs.
- Published new regulations that prioritize use of High-Impact SRCs on October 31, 2025. These regulations will drive greater water quality improvements by further incentivizing new, voluntary green infrastructure projects in the MS4 area, where they deliver the most impact.
- Reported annual Point Source data for Blue Plains wastewater and combined sewer system data to the EPA CBP Point Source online application. The last report was submitted in October 2025.

2024-2025 Milestones Not Achieved

- None.

2026-2027 Milestone Strengths

- The District of Columbia has committed to expanding the market for advanced stormwater retention crediting.

Key Areas to Address in the 2026-2027 Milestone Period and beyond

- Continue to work with EPA in offsetting any new or increased nutrient and sediment loads in the District's portion of the Chesapeake Bay watershed.

Potential Federal Actions and Assistance

EPA remains prepared to assist each of the seven watershed jurisdictions in implementing the 2026-2027 milestones. EPA will work with each jurisdiction to develop specific oversight and assistance activities to provide prioritized support for implementation efforts, including funding, technical assistance and analysis, training, and regulatory reviews.

EPA plans to continue to commit staff, contractual and funding resources to support the seven watershed jurisdictions in implementing the 2026-2027 milestones and future two-year milestones. This support includes evaluation of the most-effective practices and locations; annual funding assistance to address priority implementation needs; evaluation of Bay jurisdictions' implementation capacity under various staffing, funding, regulatory and programmatic scenarios; local planning outreach; legislative and regulatory gap analysis; and monitoring trend analyses.

In addition, EPA will continue to work with federal partners to provide leadership and coordinate with Bay jurisdictions on WIP and two-year milestone implementation to reduce pollutants from federal lands. EPA will continue its commitment to track annual progress of the Bay jurisdictions and make those results available to the partnership and the public. [See: <https://www.epa.gov/chesapeake-bay-tmdl/epa-oversight-watershed-implementation-plans-wips-and-milestones-chesapeake-bay> and <https://www.chesapeakebay.net/news/pressrelease/chesapeake-bay-watershed-jurisdictions-continue-working-toward-nitrogen-and-phosphorus-goals-with-sediment-goal-already-achieved>]