

## **EPA EVALUATION OF FEDERAL AGENCY 2024-2025 and 2026-2027 MILESTONES**

### **Executive Summary**

The Chesapeake Bay Program (CBP) partnership established the goal of implementing and maintaining 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 federal agency progress towards meeting its commitments supporting achievement of watershed-wide and jurisdiction-level interim targets for nitrogen, phosphorus, and sediment. To the extent possible, this evaluation includes an assessment of progress toward attaining local federal nutrient and sediment planning targets and the federal programmatic support for the 2024-2025 milestone period. This evaluation also provides an assessment of sector-specific programmatic commitments for the 2026-2027 milestone period.

In reviewing federal agency final programmatic and numeric progress for the 2024-2025 milestones and the final 2026-2027 milestone commitments, EPA identified sector-by-sector strengths as well as areas for improvement and incorporated feedback from the Management Board<sup>1</sup> on the federal two-year milestone commitments.

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

- EPA has met its nitrogen target for atmospheric deposition.
- United States Forest Service (USFS) exceeded three of its four numeric implementation targets, including timber harvests, culvert/road/aquatic organism passage (AOP) improvements, and road decommissioning and closures.
- The revised milestone commitment document provides an overall more effective description of the priority federal actions for the 2026–2027 period than previous versions.

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

- Federal agencies should continue to work collaboratively to align funding and programmatic support for state and local agricultural programs to increase implementation of priority

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<sup>1</sup> As of July 2026, the Management Board was dissolved as part of the revised Governance and Management Framework. Future milestones and evaluations will be shared with the Policy Steering Committee.

agricultural best management practices (BMPs), and partner with state agencies to ensure that BMPs are properly credited and reverified.

### **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 Committee<sup>2</sup> (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 Board meeting](#) the CBP partners agreed to define the "water quality targets" as the Interim Targets and Conowingo Targets.<sup>3</sup> The Interim Targets are the Phase III Planning Targets factoring in 2025 changing environmental conditions and Unaccounted Additional Loads (UALs).<sup>4</sup> 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 WIPs, two-year milestone commitments and other innovative strategies to achieve and maintain reduced levels of nitrogen, phosphorus and sediment.

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. The CBP partnership also committed to develop new or amended WIPs to meet the updated targets by 2040.

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.

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<sup>2</sup> As of July 2026, the PSC name changed to the Policy Steering Committee.

<sup>3</sup> 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.

<sup>4</sup> 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.

## **Progress on 2024-2025 Federal Numeric Milestones**

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. Using the Chesapeake Assessment Scenario Tool (CAST) 2023, this information (or “annual progress runs”) provides an estimate of how much nitrogen, phosphorus, and sediment has been reduced.

When evaluating jurisdiction 2024-2025 milestone implementation, EPA simulated nutrient and sediment loads using CAST-23<sup>5</sup> and wastewater discharge data reported by the jurisdictions.

According to the data provided by the jurisdictions for the 2025 progress run, BMPs have been implemented to achieve an estimated 57% of the nitrogen reductions, 90% of the phosphorus reductions, and 100% of the sediment reductions needed to attain applicable water quality standards.

### **The Environmental Protection Agency:**

- Achieved its numeric milestone for air reductions. EPA’s portion of air deposition load reduction to the tidal surface waters was reduced by 0.76 million pounds of nitrogen over the 2024-2025 period based on the Phase 6.0 Watershed Model. EPA met its nitrogen target for atmospheric deposition

### **The United States Forest Service (USFS):**

- Exceeded its milestone commitment to monitor at least one timber sale/year for water quality BMPs utilizing the USFS National BMP Monitoring protocol for Vegetative Management (2 projects completed).
- Exceeded its milestone commitment to implement 1 culvert/road/aquatic organism passage (AOP) improvement project per year (7 projects completed)
- Exceeded its milestone commitment to implement Road Decommissioning or Road Closure of approximately 1 mile (6.8 miles completed)
- Did not complete its milestone commitment to implement 10,000 acres of prescribed burning per year (20,000 acres total). Completed 16,535 acres of prescribed burning across George Washington & Jefferson National Forests.

**The Department of War:** Completed its milestone commitment to submit 2024-2025 planned BMP implementation in CAST for Virginia, Maryland, the District of Columbia, and Pennsylvania. According to a DoW analysis, DoW met numeric milestones for total nitrogen reductions in all jurisdictions and met milestones for total phosphorus reductions in Pennsylvania and Virginia.

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<sup>5</sup> CAST-23 is part of the Phase 6.0 suite of modeling tools for the Chesapeake Bay.

### 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](http://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.

### Comments on Federal Programmatic Milestones

#### Agriculture

##### **2024-2025 Milestone Achievements**

- United States Geologic Survey (USGS), EPA, and USDA NRCS established enhanced monitoring, including continuous water quality monitoring, to measure the effect of agricultural conservation practices on water quality of local streams and rivers in 5 small watersheds.
- EPA continues to fund USGS to support state agencies in BMP reporting within the Chesapeake Bay watershed through the annual provision to provide aggregated USDA conservation data to the jurisdictions.
- USDA NRCS is financially supporting agricultural certainty and recognition programs in the Bay watershed jurisdictions.

#### **2024-2025 Milestones Not Achieved**

- None.

#### **2026-2027 Milestone Strengths**

- NRCS commits to partner with state, local, and federal partners—including EPA and U.S. Fish and Wildlife Service (USFWS)—to target watersheds impaired by agricultural activities through the National Water Quality Initiative (NWQI) for outreach, education, technical support, and financial assistance.
- USFS commits to implement and report on projects in National Forests that will improve water quality and restore habitats.
- USFS commits to work with state forestry agencies to develop a strategy, workplan and indicators to support implementation of the Health Forests and Trees Outcome of the 2025 Chesapeake Bay Agreement.

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

- Federal agencies should continue to work collaboratively to align funding and programmatic support for state and local agricultural programs to increase implementation of priority agricultural BMPs that enhance Chesapeake Bay water quality, and partner with state agencies to ensure that BMPs are properly credited and reverified.

#### **Oversight and Support to Bay TMDL/WIP**

##### **2024-2025 Milestone Achievements**

- EPA completed work to develop tools to support resilient stormwater management and to assess agriculture, silviculture, and other non-stormwater BMP efficiencies under future hydrologies.
- United States Army Corps of Engineers (USACE) ensured technical assistance and other program information was available to communities and non-federal partners.
- DoW met its commitment to annually provide BMP Credit Reports to EPA and Virginia, Maryland, the District, and Pennsylvania. Information was used to inform both DoW and jurisdictional actions that could be taken to maximize credit in support of jurisdiction WIPs.
- DoW worked with EPA and the District to rectify BMP databases and improve the number of BMPs credited from 2022-2024.
- According to a DoW analysis, DoW met its numeric milestone commitments for total nitrogen pollution reductions in all jurisdictions and met milestone commitments for total phosphorus reductions in Pennsylvania and Virginia.
- EPA resolved 9 Clean Water Act enforcement cases for stormwater, agriculture and wastewater operations in the Chesapeake Bay watershed in 2024 and 15 in 2025.

##### **2024-2025 Milestones Not Achieved**

- Some federal agencies did not report BMP implementation to the Bay jurisdictions annually with copy to EPA.

- In future progress evaluation years, Federal agencies should provide additional detail about progress made on milestones marked as having “ongoing” implementation to further illustrate the activities completed during the milestone period.

### **2026-2027 Milestone Strengths**

- EPA commits to conduct at least 20 inspections annually of Clean Water Act National Pollutant Discharge Elimination System (NPDES) permitted facilities.
- DoW commits to provide numeric milestones for total nitrogen and total phosphorus reductions in Pennsylvania, Virginia, Maryland, and the District.

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

- Federal agencies should continue to foster interagency coordination and collaboration to best support jurisdictional clean water efforts and advance progress toward shared water quality goals.

### **Urban/Suburban Stormwater and Wastewater**

#### **2024-2025 Milestone Achievements**

- EPA completed 16 draft NPDES permit reviews in 2024 and 9 reviews in 2025.
- EPA provided funding towards the Green Streets, Green Towns, Green Jobs grant program to help communities develop and implement plans that reduce stormwater pollutant loads.
- EPA partnered with state and non-profit staff to provide 15 on-site trainings to wastewater operators during the milestone period.

#### **2024-2025 Milestones Not Achieved**

- None.

### **2026-2027 Milestone Strengths**

- DoW commits to submitting 2026-2027 planned BMP implementation in CAST for Virginia, Maryland, the District of Columbia, and Pennsylvania.
- DoW commits to work with Maryland to establish a new Federal Planning goal tied to Municipal Separate Storm Sewer System (MS4) permit compliance.
- DoW commits to implement and report on projects which will result in 20,000 trees planted and 8,000 linear feet of streambank and shoreline restored.
- DoW commits to complete Readiness and Environmental Protection Integration (REPI), REPI Challenge, and Sentinel Landscape projects which will result in 8,000 acres of conserved land in the Chesapeake Bay watershed.

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

- Continue to develop plans to implement stormwater BMPs to meet the federal local planning goals and local stormwater permit requirements.

**Other** (Monitoring and Science Support, Atmospheric Deposition, Toxic Contaminants, Enforcement, Changing Environmental Conditions, Funding Support)

### **2024-2025 Milestone Achievements**

- EPA approved polychlorinated biphenyls (PCB) TMDLs in the James, Maury, and Jackson River watersheds during the milestone period.
- EPA provided funding for the Chesapeake Monitoring Cooperative to expand the network of participating organizations and to develop a bacteria monitoring program in Maryland.
- USGS coordinated with federal agencies (DoW, GSA, NPS, USFWS, USDA-USFS, USDA-other) to correct errors identified in the federal land GIS files for landholdings within the Chesapeake watershed, resulting in a revised federal boundary dataset.
- USGS published annual calculations of total nitrogen, phosphorus, and sediment loads delivered to the Bay, supporting improved understanding of tidal water quality trends through continuous monitoring at River Input Monitoring stations.
- National Oceanic and Atmospheric Administration (NOAA), with support from USGS and EPA, completed implementation and maintenance of the Chesapeake Bay water column hypoxia monitoring system and coordinated with the CBP Hypoxia Collaborative on system management, including finalizing monitoring equipment siting and supporting development of the 4D Interpolator.
- DoW conserved 3,450 acres of land in 2024 and 5,852 acres in 2025 through projects supported by the REPI program.
- DoW implemented 90 BMP projects during the milestone period which provided multiple environmental benefits, including enhancing resilience to changing environmental conditions.
- DoW worked with the Commonwealth of Pennsylvania to achieve designation of the Kittatinny Ridge Sentinel Landscape (KRSL) and hired staff to coordinate implementation of a strategic plan.
- In CY2024, EPA Region 3 concluded 9 Clean Water Act (CWA) enforcement cases in the Chesapeake Bay watershed and EPA Region 2 conducted 3 inspections and took two enforcement actions. In CY2025, EPA Region 3 concluded 5 Clean Air Act (CAA) aftermarket defeat device cases, 1 locomotive case, 3 mobile source cases, and 15 CWA cases, all resulting in nutrient and/or nitrogen oxide reductions.
- EPA provided financial support to the Bay jurisdictions through assistance programs including CWA Section 319, Clean Water State Revolving Fund (SRF), 117 Chesapeake Bay Implementation Grants (CBIG) and Chesapeake Bay Regulatory and Accountability Program Grants (CBRAP). EPA provided financial support to localities and other entities, as authorized and assuming adequate appropriations, through the Innovative Nutrient and Sediment Reduction Grants (INSR) and the Small Watershed Grants (SWG).

### **2024-2025 Milestones Not Achieved**

- None.

### **2026-2027 Milestone Strengths**

- EPA will maintain nitrogen reductions via atmospheric deposition to tidal waters through implementation of national rules under the Clean Air Act.

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

- Ensure the 2026-2027 milestone progress report clearly identifies the completion status, deliverables, and numeric outputs of milestone activities.

### **Potential Federal Actions and Assistance**

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 to coordinate with the Federal Management Committee group to coordinate programmatic and BMP-specific milestones. 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>]