

Recommended Option for “Near-Term Milestones”

Overview

The WQGIT has been discussing proposed recommendations for the PSC and the MB to apply adaptive management to the milestones process. Attachment A reiterates the initial ask and the charge. The WQGIT has discussed partner input and ideas since August. Several recommendations were proposed (Attachment B) and the WQGIT achieved consensus at our December meeting around the following recommendations for the “near-term” milestones and includes the feedback from the partnership.

Recommended Option: Process Changes and Innovation

1. **High level programmatic milestones with factsheets; no numeric milestones:** Partners develop a 1-3 page document of high level programmatic actions to cover the agreed upon milestone period. Partners (Jurisdictions/Conowingo/Federal Agencies) will develop a 2-page fact sheet at the end of the agreed upon milestone period for presentation at the EC meeting which outlines successes, barriers, and actions to overcome barriers in meeting programmatic initiatives and implementation.
 - a. Partners have the option to continue to develop more detailed programmatic milestones, similar to the current programmatic milestones.
 - b. Innovative actions are recognized but not evaluated based on their outcome.

Options: Duration

1. Maintain **two-year** milestone schedule (Jan 2026-Dec 2027)

Feedback

- Three partners agreed with reservations. Emphasis on accountability with annual programmatic updates would be preferred. There was interest in the numeric elements of option 2 and the annual feedback loop highlighting actions to address barriers to tell a wholistic story or progress and actions. (EPA, CBC, Joe Wood – at large).
 - Jurisdiction partners felt that annual numeric progress is already measured, and a numeric milestone could add confusion or be duplicative and the programmatic milestones are the drivers for action and change.
- One partner expressed a preference for three year milestones vs. two. (Pennsylvania). Two other partners (DE and WV) expressed that they were open to either two or three year milestones for the near-term period, depending on how the milestone period ultimately aligns with the Phase 7 roll-out.

Attachment A. Background Information on Near-Term Milestones

2024 Proposal to MB and PSC

- Partnership will continue to use milestones during Phase 2 Beyond 2025 discussions
- Maintains efforts to implement the Phase III WIPs and meet the interim targets

WQGIT Charge:

WQGIT will develop recommendations/options for near-term milestones¹ for:

- Timeline options (2, 3, 4 year) and rationales to support the options
- Considerations for piloting/sandboxing new ideas to include in the milestone period(s)
 - Recommendations should include any boundaries or constraints believed to be necessary for piloting/sandboxing
- Changes only apply to the near-term milestones; longer term changes would be a separate discussion/decision.

Background

- Changes to the milestones would not affect annual progress runs. Partners will continue to report numeric progress each year. EPA will continue to evaluate the partners' progress in relation to the interim targets² unless the CBP partnership agrees to measure progress toward a different target.
- Federal agencies continue to report progress to the states to be reported into NEIEN and that progress is rolled into the annual progress runs; that process will not change.
- EO 13508 does not require federal agencies to develop milestones; that came from the EO Strategy. However, EO 13508 does call on federal agencies to lead by example and be equal partners in Bay restoration.

¹ "Near term" milestones are those milestones that span 2026 through when there are new targets established by the partnership using the Phase 7 modeling tools (approximately 2028 or 2029).

² Interim Targets are the Phase 3 Planning Targets factoring in 2025 climate and Unaccounted Additional Loads (UALs). In 2023, the partnership agreed to use these targets until the Phase 7 modeling tools were developed. 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.

Attachment B. OPTIONS PROPOSED in December 2024 WQGIT

Options: Process Changes and Innovation

1. **High level programmatic milestones with factsheets; no numeric milestones:** Partners develop a 1-3 page document of high level programmatic actions to cover the agreed upon milestone period. Partners (Jurisdictions/Conowingo/Federal Agencies) will develop a 2-page fact sheet at the end of the agreed upon milestone period for presentation at the EC meeting which outlines successes, barriers, and actions to overcome barriers in meeting programmatic initiatives and implementation.
 - a. Partners have the option to continue to develop more detailed programmatic milestones, similar to the current programmatic milestones.
 - b. Innovative actions are recognized but not evaluated based on their outcome.
2. **Option 1 plus numeric milestones:** As in option 1, partners develop a 1-3 page document of high level programmatic actions to cover the agreed upon milestone period. Partners also develop a CAST scenario estimate for annual numeric reductions expected to be achieved per year over an agreed upon timespan based upon expected/available resources.
 - a. EPA will conduct an annual assessment of progress toward the numeric milestones (in addition to the annual progress run showing progress toward the interim targets). If an entity is over or under its annual numeric projection by more than a certain amount predetermined by the partnership (a percent or number) then the partner would provide a narrative (no more than 2 pages) of what changes will be made the following year to address necessary changes. The two-page partner narrative would speak to where adjustments might need to be made, not an assessment of all programmatic actions.
 - b. Jurisdictions' numeric progress is based on their projection of what could be achieved in the timeframe based upon available resources each year.
3. **Programmatic milestones as part of SRS:** Build actions directly into the SRS workplan instead of developing a separate set of milestones. (Next SRS workplan would be developed in late 2026 or early 2027)
 - a. Jurisdictions would need to provide milestones and updates into the SRS workplan and report out on the progress per the current SRS schedule. (a briefer update on progress in the mid-year and a full update on progress for the final year).
 - b. EPA would use the water quality milestones information only for evaluation purposes. Not an evaluation or review of the full WQGIT workplan.
 - c. Timing for the WQ cohort QPM would have to accommodate the timing of milestones.
 - d. This would maintain a two-year cycle for milestone duration.
 - e. Per the EO Strategy, Federal agencies will continue to develop programmatic milestones as under the current milestone structure.

4. Maintain existing milestone structure and process developing numeric milestones and programmatic milestones) and consider changes to duration and content as outlined below. [Numeric milestones](#) can be either a CAST scenario or a projection for the priority BMPs as outlined in the Phase III WIPs.

Options: Duration

1. Maintain **two-year** milestone schedule (Jan 2026-Dec 2027)
2. **Three-year** milestone schedule (Jan 2026-Dec 2028)
3. **Four-year** milestone schedule (Jan 2026-Dec 2029)

Options: Changes to Milestones Content if WQGIT decides to maintain current milestone structure

1. Include policy BMPs and actions into the milestones to acknowledge the jurisdictions' efforts in these areas.
2. Only develop and provide high level priorities as milestones.
3. Include actions to advance EC Directives be reported in the milestones.
4. Describe co-benefits of actions and connections w/ other Watershed Agreement outcomes.
5. Include a section in the programmatic milestones labeled "Innovation". In EPA evaluations, items listed as innovative actions are recognized but not evaluated based on their outcome.
6. Propose "initiate sandboxing approaches" as a milestone in each entity's programmatic milestones. Progress would be reported out on an agreed upon schedule.
 - a. If a jurisdiction included sandboxing ideas these would not be "evaluated as pass/fail" by EPA but recognized as an effort attempted regardless of the outcome.