Green - action has been completed or is moving forward as planned   **Yellow** - action has encountered minor obstacles   **Red** - action has not been taken or has encountered a serious barrier

Action #	Description	Performance Target(s)	Expected Timeline	Potential Implementation Challenges	Potential Recommendations on Improvement	Resources Needed				Reason for Change to Action Item (2022-2023 milestone period)
						Technical	Suggested Source	Financial	Suggested Source	
Programmatic Initiative 1: Programmatic, Policy and Regulatory Changes										
1.1*	**Organizational Structure –** Integrate Chesapeake Bay planning efforts with county planning through dedicated personnel available to support local goal implementation and address capacity issues on a county-by-county basis.	• Organizational chart for all participating entities with roles and responsibilities developed. Share chart with county partners. • Hire state level staff • Necessary information identified for exchange reporting criteria • Schedule for reports established in data verification process manual	2022	• Integrated staff should be at DEP level but with frequent interaction in collaboration with county staff. • 2-3 staff at DEP for administration of program, and at least 1 dedicated staff person at Franklin County • Program needs to recognize and provide support for plan implementation for counties' unique needs	• Adequate staff to lead program development. • Additional staff needed to address capacity issues such as data reporting/verification, plan writing at CDs, program administration specialists, etc. Implementation efforts have increased workload at the county level. With more projects to complete on a quicker timeline, additional assistance is needed to facilitate these efforts and the capacity of this new work.	Staff will need to be hired to lead and coordinate the Plan effort.	Source: State and County part to be determined	State and local funds sufficient for staffing.	Suggested source: State/Local	**(Existing item altered/added to during 2021 two-year milestone update.)** **August 2021:** This item was originally a broad idea. Since this item was created, CBO staff and coordinators have been hired & facilitating CAP effort. This item has been updated to look further into additional needs identified through implementation process.
1.2*	**Program Efficiency –** • Establish a pollution reduction policy that consolidates sediment, nutrient, and stormwater requirements into a single plan for counties within the Chesapeake Bay watershed (MS4/TMDL/WIP3 and Act 167 requirements) • Develop uniform standards and regulations for pollution reduction within the Chesapeake Bay region to decrease cross-	• Establish clear guidelines with input from local municipal levels • Gain required approvals of plan guidelines from state and federal agencies • Develop a pilot program to test guidelines within representative counties • Identify funding for plan development, requirements and metrics • Train county and municipal staff on consolidated plan requirements and implementation • Complete rollout of revised guidelines with adequate staffing support from DEP for Implementation	2023	• Currently, there are challenges with scale of implementation, with redundancy in the system, and a lack of consistency in the inspection and review process. Currently, the required plans don't communicate well with one another and the process of reworking them will be complex. • If/When the policies are established, there remain obstacles in the form of lack of staffing and funding for program implementation. Nonetheless, these recommendations are an attempt to increase and direct funding to nutrient reduction projects in the	• Institutional barriers exist to optimizing implementation of pollution reduction measures. The recommended policy changes would make it easier to fund and implement projects with the greatest nutrient reduction potential. The challenge is gaining consensus and approval from required levels of government. • We feel this process is needed to pool resources, get widespread buy in and increase efficiencies towards meeting objectives. It will encourage municipalities to think on a watershed- wide basis rather than MS4 regulated/non-MS4	Staff at state and county level	State/local	State/local	State/local	**(Existing item altered/added to during 2021 two-year milestone update.)** **August 2021:** No action changes to this item – only formatting/re-wording edits. Due to the scale of this request and limitations of creating a "single plan" across multiple geographies and agencies in such a short time, Franklin County has decided to find a creative, county-level solution to address this planning need in the meantime. No further action on this item is being requested of DEP at this moment in time.

#	Recommendation	Outcomes	Year		Rationale	Type					Notes
	boundary inequalities • Enact a policy that allows financial resources to be targeted toward highest impact projects within regulated watersheds	• Implementation of uniform standards in Chesapeake Bay watershed counties • Review legislation on stormwater tax, examining feasibility of implementing in non-MS4 communities • Develop policy language that allows allocation of a proportion of stormwater tax funds to be spent on high priority projects within the watershed impacted by a municipality but not necessarily within that municipality's borders • Obtain necessary approvals from EPA, DEP and state legislature		highest risk area of targeted watersheds. Additionally, they are designed to decrease resentment that arises from inequitable regulations.	regulated areas.						
1.3	**Program Efficiency –** • Simplify permitting process for installation ofBMPs (DEP Water Obstruction and Encroachment and joint DEP/Army Corps of Engineers). Expedited permit process needed for any/all CAP BMP Implementation projects.	• Permit application process simplified and communicated to stakeholders • Decreased wait time for permit approvals • Improved proportionality of effort	2023	• Smaller projects currently require the same amount of effort as large-scale projects in terms of the permit requirement process. This recommendation requires reviewing and streamlining the permitting process.	• This recommendation entails evaluating Chapters 102 and 105 of the Clean Streams Act in order to evaluate proportionality and scale of projects that involve BMPs in or near streams. • Focus should be on implementing as many BMPs in the Chesapeake Bay region as possible, not on regulating large and small projects under the same permit requirements. Current process puts counties with fewer resources at a disadvantage. • Implement a multi-project permit such as a "watershed permit". Model permit process off of CAP Block Grant process to create a "Block Permit" for CAP Implementation projects, where any BMP Implementation or Enhancement Project can be included on the block permit rather than needing individual CAP BMP Implementation Project Permits.	Regulatory changes	State	State	State		**(Existing item altered/added to during 2021 two-year milestone update.)** **August 2021:** This item was originally a broad idea. Since this item was created, DEP has provided an update on their permitting efforts. This item has been updated with a new recommendation of a potential solution to further address permitting needs identified through implementation process.

| 1.4 | **Program Efficiency –**

Simplify funding and grants administration for implementation of BMPs | Grants program changed to more of a targeted regional approach with an allotment of funding for each county in the Chesapeake Bay region rather than a competitive grants process between counties. | 2022 | Additional technical and fiscal support needed for funding applicants. | • Evaluate Growing Greener and other grant programs for agricultural and other BMPs related to nutrient load reductions, and improve the process.

• The administration of funding should be addressed as a centralized state agency process to reduce paperwork burdens on county level staff responsible for BMP installation and program management. Counties would be responsible for project prioritization and implementation rather than grant management and preparation of applications.

• Model more funding programs off of the CAP Block Grant structure and allow more flexibility related to eligibility of costs associated with BMP implementation as other programs do (such as design).

• Within CAP Block Grant program, extend contractual category 25% allocation (allowable for engineer/design cost) to include all project readiness costs/expenses, including but not limited to: preliminary studies (wetland studies, PNDIs, hydrologic & floodplain studies, etc.), permitting, etc. | Admin & regulatory changes | State | State | State | **(Existing item altered/added to during 2021 two-year milestone update.)**

August 2021: This item was originally a broad idea. Since this item was created, DEP has created the CAP Block Implementation Grant. This programmatic item has been updated with the recommendation to further build on the block grant solution to further the use of the block grant model. We would like to see more programs take on the structure of the block grant program. |

1.5	**Data Collection –** Create a central state warehouse for data collection and reporting regarding implemented BMPs, county conservation plans, restoration project permits, grant applications, 4R practices, etc.	• Establish a centralized data collection and reporting system (enhancing existing systems where applicable)	2023 (ongoing) • **Note:** central warehouse is created, ongoing process continues to accomplish smooth operation	• Coordination between FCCD, NRCS, DEP, EPA, others – consistency and communication of data • Reporting system will require maintenance, updates and adequate tracking and verification • Privacy concerns about data if subject to right to know	Establish database and reporting system	Develop system, Train staff	State	State	State	**(Existing item altered/added to during 2021 two-year milestone update.)** **August 2021:** DEP has reported progress on this item regarding the BMP Data Warehouse, and FCo. acknowledges the progress on this item as DEP continues this work. When FieldDoc and BMP Data Warehouse are all fully functional and we have transitioned to its intended use, this item will be marked complete. We ask no new actions of DEP on this item, just the continuation of work toward smooth functionality and operation of this tool.
1.6	**Capacity Building –** *Workforce (BMP Data Collection & Verification)* • Implement a survey process for capturing current agricultural best management practices that are unreported.	Wide scale survey to be completed by 2023	2023	• Participation • Coordination between agencies • Right-to-know	Survey needs to be standardized across the region and implemented in an organized fashion. We have heard from stakeholders that they feel they have answered surveys in the past but not certain what was done with the data.	Staffing – state & local	State	State	State	**(Existing item altered/added to during 2021 two-year milestone update.)** **August 2021:** No action changes to this item – only formatting/re-wording edits. DEP worked with PSU Extension to conduct a detailed survey with farmers for BMP verification. FCo. requests no further action at this time.
1.7*	**Municipal sector –** • Create a systematic process and database for inventorying stormwater management practices and facilities in MS4 and non-MS4 municipalities which could be stored in central database.	• Evaluation of stormwater management rules and regulation at state, county and local level - examine existing inventory and database systems in municipalities operating under MS4 Permits • Receive cost estimates for countywide inventory • Capture unreported BMPs on the ground for import into central database	2022	• Coordination between local governments, disagreement on structure • Identifying "owner" of multi-municipal data (lead entity) • How will financial responsibility and authority of structure be defined • Funding for inventory capture and data storage	Establish a database and reporting system	Technical assistance to develop consistent structure Personnel dedicated to managing structure - stormwater coordinator Written guidance, contracts, and agreements regarding new structure	State, local	State, local	State, local	**(Existing item altered/added to during 2021 two-year milestone update.)** **August 2021:** No action changes to this item – only formatting/re-wording edits. DEP has reported progress on this item regarding their rollout of the ePermitting system. FCo. acknowledges the progress on this item as DEP continues this work. When this is fully up/running, fully functional, and we have completely transitioned to the system, this item will be marked complete. We ask no new actions of DEP on this item, just the continuation of work toward smooth functionality and operation of this tool.

| 1.8 | Program Guidance – Refine BMPs listed in manual and provide updated direction in implementation. | Complete BMP manual with updated practice descriptions that have greater alignment with PA agricultural practices | 2020 | Changing practice descriptions and credits in the model will require approval on many levels | • Many BMPs in the manual are not fully defined, particularly for a non- practitioner engaged in planning process. Many say TBA, with further definition required.

 • Many BMPs are Maryland-specific and not relevant to Pennsylvania practices.

 • Also, some practices are not given credit, but it seems that they should be given more.

 • Example – model assumes that commodity cover crops receive fall nutrients, and so gives less credit for these crops. Farmers state that small grain following soybeans should be credited the same as non-commodity cover crops, as they receive many nutrients from prior soybean planting. Perhaps the practice should be defined in terms of whether or not nutrients areapplied rather than whether or not they are commodity cover crops or not. | Staff to revise manual | State | State | State | **(Existing item altered/added to during 2021 two-year milestone update.)**

 August 2021: No action changes to this item – only formatting/re-wording edits.

 DEP updated that they have received no plans from the creators of the manual to make updates to this document. FCo. is still interested in the creators of the BMP Quick Reference Guide completing the "missing pieces"/TBA items of the manual. |
| 1.9.* | **BMP Programs & Policies –**
 • Evaluate current system of incentives & penalties for BMPs and define enhanced incentive program for BMPs with greatest impact on nutrient loads to get landowner buy in.

 • Develop incentive & programs for voluntary adoption of BMPs in developed areas and consider an offset program for implementation of high-impact BMPs in agricultural areas. | • Statewide review of the overall impact of CREP, REAP, EQIP, Act 319, Growing Greener and other programs, evaluate feedback on what has or hasn't worked and communicate with local stakeholders on what new incentives are being considered | 2021 | • Program participation

 • BMP post-installation maintenance

 • Funding | • Cover crop practices involve costs for equipment, pest management, etc. Incentive programs should account for more than planting alone.

 • Remove "caps" or "maximums" per landowner from assistance & reimbursement programs to assist with as many practices as possible. Prioritize units of new BMPs over number of landowners. This will both maximize and speed up use of funds available while ensuring maximum amount of nutrients are reduced on maximum of number of acres. | Technical assistance to develop new ordinances and framework for new programs

 Staffing

 Program admin | State | State | State | **(Existing 2019 Plan item altered/added to during 2021 two-year milestone update.)**

 August 2021: This item existed in the previous version of the plan. Targets, partners, challenges, and resources have been reevaluated and identified. An additional action item was added to the description to expand potential opportunities surrounding the original item phrase, "evaluate current system of incentives…" regarding "BMP Programs & Policies". |

| 1.10* | Commercial & Residential Fertilizer –

 Implement an efficient documentation program to track commercial & homeowner nutrient applications on developed land. | • **Provide support for current fertilizer legislation**

 • Conduct education event for commercial landscape industry and homeowners

 • Identify acreage for urban nutrient management plans | 2020 | • Contingent upon legislation

 (If Bill doesn't pass, will not be able to implement this action.)

 • Reliant among industry

 • Documentation and reporting are huge challenges | • Pass state legislation

 • CAST analysis - Commercial and home use of nutrients should be evaluated in the CAST model, more data is needed on what application levels are currently. | State lead | State | State | State | **(Existing item altered/added to during 2021 two-year milestone update.)**

 August 2021: No action changes to this item – only formatting/re-wording edits. DEP has noted they are waiting on legislation to pass to move forward on this item. |

Franklin County Clean Water Plan Programmatic Recommendations

Each county-based local area will use this template to identify:

1. Inputs – The statewide policy, regulations, initiatives and programs that needed to be looked at for success in the Phase 3 WIP.

2. Process – What are the changes that need to occur for the county to be successful in the process. These are the action items listed under each priority initiative.

3. Outputs and outcomes – both short and long-term. These are the programmatic recommendations identified by each county. The performance targets are the changes that need to occur in order to meet your county goal.

4. Implementation challenges – any potential issues or roadblocks to implementation that could impede outputs and outcomes

For each Programmatic Recommendation: Use the fields, as defined below, to identify the inputs and the process that will be followed to achieve each programmatic recommendation. This is the "who, what, where, when and how" of the plan:

Description = What. This may include programs that address prevention, education, or changes to current policy and regulation. A programmatic or policy effort will allow for the completion of action items listed in the Planning and Progress Template.

Performance Target = How. This is an extension of the Description above. The Performance Target details the unique BMPs that will result from implementation of the Priority Initiative and serves as a benchmark to track progress in addressing the Priority Initiative. Performance Targets may be spread across multiple Responsible Parties, Geographies, and Timelines based on the specifics of the Initiative.

Expected Timeline = When. Provide the expected completion date for the planned programmatic change. This should be a reasonable expectation, based on knowledge and experience, and will help in the completion of your county plan.

Potential Implementation Challenges = This field will note challenges and issues that may delay program implementation (Description). This can be in relation to your county plan.

Potential Recommendations on Improvement = This field will note recommendation on how to improve or change the program (Description)

Resources Needed: Technical & Funding = This field will note technical and financial resources needed/outstanding to implement the program (Description).