

Phase 3 Watershed Implementation Plan (WIP) Annual Progress Update and Two-Year Milestones Report – XX County

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 **Highlight changes for 2024-2025 milestone period**

Action # Green Yellow Red	Description	Performance Target(s)	Responsible Party(ies) and Partnerships	Geographic Location	Expected Timeline	Potential Implementation Challenges or Recommendations	Resources Available		Resources Needed		Annual Progress to Date (2021 + 2022 + 2023) *add new 2023 progress above the existing 2021 and 2022 progress. Date each entry	Reason for Change to Action Item (2024-2025 milestone period)
							Technical	Financial	Technical	Financial		
Priority Initiative												
1.1	Develop 2p Basic Manure Management Plans Core N	Develop 10,000 acres worth of plans for farmers.	SCCD Staff & Farmers	Example: Countywide Black-Creek and Lick-Creek Watershed	2021-2025	New operations coming in and lack of cooperation.	Nutrient Management Planners	\$32,225	1 Nutrient Management Planner Position (Staff)	\$70,000	8/2023 Manure Management Plans are still being completed in the county, one MMP has been completed in the Black or Lick Creek Watersheds. 7/2022 Manure Management Plans have been completed, however none in Black Creek or Lick Creek Watersheds.	Either time restrictions due to work load and staffing or there have been no farmers that have been brought to the attention of the district that have need MMP. Possibly expand outside of the Black and Lick Creek Watersheds.
1.2	Develop Ag Erosion and Sedimentation Plans	Develop 10,000 acres of Ag E&S plans for farmers.	SCCD Staff & Farmers	Countywide Black-Creek and Lick-Creek Watershed	2021-2025	Landowners that do not farm getting Ag E&S plans completed.	Conservation Planners	\$32,225	1 Planner Position (Staff)	\$70,000	8/2023 Ag E&S Plans are still being completed in the county, one Ag E&S plan is currently being worked on in those watersheds. 7/2022 Ag Erosion and Sedimentation Plans have been completed, however none in Black Creek or Lick Creek Watersheds.	Either time restrictions due to work load and staffing or there have been no farmers that have been brought to the attention of the district that have need MMP. Possibly expand outside of the Black and Lick Creek Watersheds.
1.3	Expanded Nutrient Management Planning focusing on 4R's especially focusing on legume and manure N availability and the reduction of N Fertilizer.	Develop 8,000 acres worth of nutrient management plans for farmers.	SCCD Staff & Farmers	Countywide Black-Creek and Lick-Creek Watershed	2021-2025	Convincing farmers that they are over-applying fertilizers.	Nutrient Management Planners	\$32,225	1 Nutrient Management Planner Position (Staff)	\$70,000	8/2023 One VAO is being discussed in that watershed, no plan has been started. 7/2022 Expanded Nutrient Management Planning have been completed, however	No CAO operations have been identified in those watersheds. Possibly expand outside of the Black and Lick Creek Watersheds.

											none in Black Creek or Lick Creek Watersheds.	
1.4	Barnyard Runoff Controls	Install .7 acres of barnyard runoff control BMPs.	NRCS, SCCD Staff, Farmers	Countywide Black-Creek and Lick-Creek Watershed	2022-2024	Lack of Experienced Staff	Engineering and Inspection	\$250,000	1 Engineer for design	\$50,000	8/2023 Roughly 600 linear feet of barnyard runoff control has been implemented this year, however no CAP funds were used. 7/2022 No barnyard runoff controls have been installed to date.	SCCD identified one project this year and is looking for more projects for the 2024 CAP round. Possibly expand outside of the Black and Lick Creek Watersheds.
1.5	Manure Storage	Install 2 acres of manure storage BMPs.	NRCS, SCCD Staff & Farmers	Countywide Black-Creek and Lick-Creek Watershed	2022-2025	Lack of Experienced Staff	Engineering and Inspection	\$200,000	1 Engineer for design	\$200,000	8/2023 No change 7/2022 No manure storages have been installed to date.	No change Possibly expand outside of the Black and Lick Creek Watersheds.
1.9	Stabilization of Animal Walkways and Travel Lanes	Install .5 acre of walkway and travel lanes BMPs.	NRCS, SCCD Staff & Farmers	Countywide Black-Creek and Lick-Creek Watershed	2022-2024	None	Engineering and Inspection	\$150,000	1 Engineer	\$500,000	8/2023 No change. 7/2022 No Stabilization of animal walkways and travel lanes have been installed to date.	No change Possibly expand outside of the Black and Lick Creek Watersheds.
1.12	Establish Funding/Staff support to the Agricultural Community	Write plans and continue installation of BMPs for planned implementation. Establish demo plots and plan field days.	MCCD, DEP and NRCS	Countywide Black-Creek and Lick-Creek Watershed	2021-2023	Limited funding available.	Staff	\$32,223	Establish 1 Full Bay Position	\$32,225 towards the position.	8/2023 No change 7/2022 Sullivan County Conservation District staff continue to write plans, asses BMPs for implementation in the Black Creek and Lick Creek Watersheds with a combination of programs including Phase II inspections and BMP verification. Currently, no demo or field days are planned.	No change Possibly expand outside of the Black and Lick Creek Watersheds.
1.13	Chesapeake Bay Inspection Program	Collect data and complete inspections.	SCCD Staff	Countywide Black-Creek and Lick-Creek Watershed	2021-2023	Limited time for staff.	SCCD Staff	\$30,225	1 Full Bay Position	\$32,225 towards full time technician	8/2023 SCCD has completed an additional 721 acres of inspections in those watersheds. 7/2022- SCCD has completed roughly 646 acres of inspections in the Black Creek and Lick Creek Watersheds.	Continuation of CBP Farm Inspections. Possibly expand outside of the Black and Lick Creek Watersheds.

1.14	Seek funding options for BMP Implementation	Utilize Growing Greener, REAP and EQUIP	SCCD and NRCS	Countywide Black-Creek and Lick-Creek Watershed	2021-2023	Limited funding is available.	SCCD Staff	N/A	N/A	\$100,000	8/2023 No change 7/2022- SCCD continues to look for funding to install BMPs in the Black Creek and Lick Creek Watersheds.	No change. Possibly expand outside of the Black and Lick Creek Watersheds.
2.1	Educate farmers on the importance of Soil Health.	Increase cover crops for agriculture and advanced education on the conservation of soil structure and nutrients through meetings and field days.	NRCS, SCCD Staff & Farmers	Countywide Black-Creek and Lick-Creek Watershed	2022-2024	Lack of interest among the farming community.	People with soil health and no-till knowledge	N/A	1 person with soil health and no-till knowledge	\$15,000/ Year	8/2023 The SCCD continues to hold farmer's meeting to further the education of the farming community, as well as using CAP funds to promote the use of cover crops. 7/2022- The SCCD is continuing to provide education events to farmers and cover the topics of soil and water conservation as well as nutrient conservation.	The SCCD continues to have issues with attendance at farmer's meetings and other farming related education events. Possibly expand outside of the Black and Lick Creek Watersheds.
2.2	Bay Inspections and Cover Crops	Increased cover crop usage to 2,500 acres and data collection from inspections	SCCD Staff & Farmers	Countywide Black-Creek and Lick-Creek Watershed	2021-2025	Landowner willingness to participate in cover crop program	Half Bay Technician Position	\$32,225	Full time Bay Technician Position	\$32,250 towards full time position	8/2023 The SCCD has implemented 600 acres of cover crops across the county. 7/2022 The SCCD continues to conduct inspections in the watersheds of Lick Creek and Black Creek, as well as continue to get cover crop sign ups.	Possibly expand outside of the Black and Lick Creek Watersheds.
2.3	Planting legume cover crops to reduce N fertilizer applications	Reduce nitrogen fertilizer applications by implementing 500 acres of legume cover crops	NRCS, SCCD Staff & Farmers	Countywide Black-Creek and Lick-Creek Watershed	2021-2025	Lack of research on amounts of Nitrogen available from cover crops.	Staff with soil health and no-till knowledge	N/A	1 person with soil health and no-till knowledge	\$20,000	8/2023 Cover crops have been planted in the county however, no legume cover crops have been planted. 7/2022-No planting of legume cover crops has occurred.	Small grains such as wheat and rye are the primary cover crops used in the county. Possibly expand outside of the Black and Lick Creek Watersheds.
3.1	Increase Buffers on streams and roadside ditches	Install 70 acres of buffers on farms, along streams, and near roadside ditches.	SCCD, DEP, NPC, NRCS, CREP,	Countywide Black-Creek and Lick-Creek Watershed	2022-2024	Lack of landowner participation and cooperation due to loss of acreage.	Botanists Arborists Biologists	N/A	Botanists Arborists Biologists	\$30,000	8/2023 No changes have been made 7/2022- No buffers along stream or roadside	No changes have been made

			Pheasants forever								ditches have been installed to date.	
3.2*	Provide an incentives-based program for buffers	Develop an incentive program to increase willingness to install buffers.	DEP, PDA, FDA, SCCD	Countywide Black-Creek and Lick-Creek Watershed	2022-2024	Landowners' willingness because of lack of knowledge.	N/A	N/A	Program developer	\$150 / Acre	8/2023 No changes have been made 7/2022- No buffer incentives have been created to date.	No changes have been made
3.3*	Utilize CREP Program for buffers and rental payments	Install buffers on farms with the use of the CREP program.	NRCS	Countywide Black-Creek and Lick-Creek Watershed	2022-2024	Landowners' trust in the CREP program and the loss of rented ground.	Biologist	N/A	Biologist	\$150/ Acre	8/2023 NRCS continues to increase their presence in Sullivan County. To our knowledge no buffers have been implemented. 7/2022-No CREP funds have been used to create buffers in the county to date.	No changes have been made
3.4 *	Partnership with Private Sector for education and buffer establishment	Install buffers on farms through partnership work.	SCCD, PSU Extension	Countywide Black-Creek and Lick-Creek Watershed	2022-2024	Landowners' willingness to convert cropland to buffer.	Biologists Botanists and Arborists	N/A	Biologists Botanists and Arborists	\$10,000	8/2023 No changes 7/2022- No buffers have been installed through farm partnerships work to date.	No changes have been made
3.5	Educate landowners maintenance of buffers	Control invasive species in buffers with proper management practices.	NRCS, SCCD Staff, Private Sector	Countywide Black-Creek and Lick-Creek Watershed	2022-2024	Landowners' willingness to upkeep maintenance of buffers.	Invasive species knowledge and pesticide certification.	N/A	Education Resources and Community Outreach	\$5,000	8/2023 No changes 7/2022- To date no education events or education activities have occurred in relation to buffer maintenance.	No changes have been made
3.6*	Mandatory Buffer Ordinance	Install buffers as a result of a mandatory ordinance.	Townships, SCCD, County Planning, DEP	Countywide	2022-2024	Landowner acceptance due to loss of land.	County Planning and Zoning to adopt an ordinance.	None	Ordinance developer and enforcement	N/A	8/2023 No ordinances have been made. 7/2022- No work has been done to create a mandatory buffer ordinance.	No changes have been made
3.7	Grass hay strips along streams	Install 30 acres of hay buffers along streams on farms.	SCCD, NRCS	Countywide Black-Creek and Lick-Creek Watershed	2022-2024	Landowner willingness to install buffer.	Crop Consulting	None	Crop Consulting	N/A	8/2023 Discussions have been had with landowners regarding this BMP but no progress has been made. 7/2022-Currently, no grass hay strips have been installed along streams.	No changes have been made
3.8	Streambank fencing	Limit access/ fence out 5 acres of the stream.	SCCD, NPC	Countywide	2022-2024	Landowner cooperation in	Staff	N/A	Fence contractor	\$50,000	8/2023 Discussions have been had with landowners regarding	No changes have been made

				Black-Creek and Lick-Creek Watershed		fencing implementation.					this BMP but no progress has been made. 7/2022 Out of the five acres of stream bank fencing to be installed, currently zero acres have been installed.	
4.1	Use Practice Keeper and Field Doc to track results	Track results for CAP with plans and maps	SCCD	Countywide	2021-2025	Unknown projects completed by landowners are difficult to track.	Staff to record plans and track results	N/A	Additional Staff to manage records	\$50,000	8/2023 The District continues to track BMPs and other results. 7/2022 The Conservation District continues to use Practice Keeper to track a wide variety of conservation plans, BMPs, and inspections.	No changes have been made
4.2	Track results to evaluate progress with load reductions	Reduce Nitrogen and phosphorus loading	SCCD	Countywide Black-Creek and Lick-Creek Watershed	2021-2025	Unknown projects completed by landowners are difficult to track.	Staff to track results	N/A	Additional staff to manage records	\$50,000	8/2023 The District continues to track plans and inspections in all watersheds. 7/2022 Tracking plans and inspections in those target watersheds	No changes have been made
4.3	GIS Mapping for tracking project	Draw maps to show progress in each watershed	SCCD	Countywide	2021-2025	Access to GIS mapping software.	Staff with GIS experience	N/A	Staff to use GIS Software	\$5,000	8/2023 Have not started with that project or that type of tracking. All tracking done through PK. 7/2022 Have not started in tracking projects and potential projects with GIS	No changes have been made.
4.4	Verify manure application records	Ensure farmers are following their plans	SCCD	Countywide	2021-2025	Will be very time-consuming.	Staff to complete inspections	N/A	Additional Staff	\$50,000	8/2023 The district continues to verify application records through Phase 2 inspections. 7/2022 Through Phase 2 inspections manure application records have been have verified	The District had planned a workshop with manure application record keeping as a topic and made record keeping books for the farmers of the county.
5.1	Administer the Farmland Preservation Program	Protect 200 acres of farmland from development	Landowners, SCCD	Countywide Black-Creek and Lick-Creek Watershed	Ongoing	Limited funding	Staff	50,000	Staff	\$100,000 / year	8/2023 No changes have been made. 7/2022 Currently the SCCD is encumbering	No changes have been made

											137.54 acres of preserved farmland.	
1.1	Have Penn DOT involved in various practices	Implement additional cover crop services and practices such as street sweeping	Penn DOT	Countywide	2022-2025	Lack of willingness or time to participate in the implementation	Street Workers	N/A	Designers	N/A	8/2023 The SCCD continues to work alongside PennDOT on various projects including stream and agricultural projects. 7/2022 The Sullivan County Conservation District is working alongside PennDOT on one current stream project and coordinating with them on future projects.	No changes have been made
1.2	Work with NRCS on their programs in the county	Implement programs such as EQIP and CREP	NRCS	Countywide	Present- 2025	Farmer's lack of trust in CREP	NRCS Workers	N/A	Additional Programs	N/A	8/2023 The SCCD continues to work with NRCS to provide services to Sullivan County. NRCS is attempting to expand their reach further into Sullivan County. 7/2022 The Sullivan County Conservation District has landowners involved in CREP and EQIP but currently not directly involved	NRCS is expanding their efforts in Sullivan County.
1.3	Work with the PA Game Commission in the county	Plant food plots and partner with farmers	PA Game Commission	Countywide	2022-2024	None	Game Commission Officers	N/A	More partnerships with them in the county	None	8/2023 No changes have been made 7/2022 Currently SCCD is not currently involved with the PA Game Commission in planting food plots.	No changes have been made
1.4	Continue to work with PA Fish and Boat Commission in the county	Implement stream projects that include fish habitat structures	PA Fish and Boat, SCCD	Countywide	2022-2025	Lack of knowledge of their existing and additional projects	Project planning, project implementation	Varies	N/A	N/A	8/2023 The SCCD has had PAFBC consult and assist with at least two projects in the past year. No Project done directly though them have been completed. 7/2022 The Sullivan County Conservation	Baumunk Lane project and Elf Grove project has had PAFBC consultation.

											District has been working with PA Fish and Boat Commission on a couple potential projects, however nothing has been implemented.	
1.5	Work with Trout Unlimited in the county	Enhance trout habitat in streams and waterways throughout the county.	Trout Unlimited, SCCD	Countywide	2022-2024	Lack of funding for habitat	Designers and TU Workers	Varies	N/A	N/A	8/2023 Trout Unlimited is a partnership on one current project along with PennDOT and other, however that project is on hold at the moment. 7/2022 Currently the SCCD has not worked with TU regarding enhancing streams and waterways.	Birch Creek Low Head Dam project is a partnership between a variety of state and local organizations.
1.6	Continue to work with NPC	Continue working relationship with NPC which includes installing buffers, fish habitat, and tree plantings	NPC SCCD	Countywide	2022-2025	None	Buffer planting, fish habitat designers and implementers	N/A	None	None	8/2023 Sullivan County does not have any Ag impaired streams so partnership with NPC might be challenging. 7/2022 The SCCD has not yet partnered with NPC on any projects, though ideas for potentially future projects have come about due to discussions with NPC.	No changes have been made
1.7	Have County Workers involved in implementation practices	Help implement, fund, organize and monitor implementation of CAP practices	Commissioners Zoning Planning Grounds Crew	Countywide	2022-2024	Lack of time or willingness to participate in implementation	Additional help to implement practices	N/A	Additional help to implement practices	N/A	8/2023 No changes 7/2022 Sullivan County workers, mainly the Planning Department and the Commissioners Office, have been involved to some degree in the planning of potential projects.	No changes. County workers continue to work with staff on the Stream Bank Stabilization program.
1.8	Work with DCNR in the County	Improve forests and roadways through the forest on public land	DCNR, Game Commission, Fish and Boat Commission	State Forest	2022-2025	None	DCNR Foresters and Educators	N/A	N/A	N/A	8/2023 No changes 7/2022- Currently, no projects are planned with DCNR.	No changes
1.9	Work with the county Ag-Land Preservation Program	Preserve farmland throughout the county	SCCD, County Ag-land Preservation	Countywide	2021-2025	Lack of funding	County Admin	Varies	None	\$100,000	8/2023 No changes 7/2022- The Sullivan County Conservation District is currently	No changes

											working with the AG-Land Preservation Program in preserving farmland. Currently, the SCCD in encumbering 137.54 acres.	
1.10	Continue to work with Chief Oil and Gas company in the county	Improve fish habitat throughout the county	SCCD, Chief Oil and Gas, Fish and Boat Commission	Countywide	2021-2025	None	None	Varies	None	None	8/2023 Elk Creek Phase IV has been started. The SCCD is working with Dave Keller on a design and getting landowner approval. Funding was delayed to next year, project is currently on hold. 7/2022- There have been projects done in the past with Chief Oil and Gas Company, none in the past year.	Elk Creek Phase IV is in the works.
1.1	Continue work on Dirt and Gravel Road Projects	Reduce road runoff and washouts on 10 miles of roadway	SCCD	Countywide	2021-2025	N/A	Engineers	Varies	Additional Staff and Workers	\$50,000/ year	8/2023 The SCCD continues to administer the DGLVR program. 7/2022 Currently, the SCCD has reduced road runoff through the DGLVR program on 3 miles of roads.	No changes.
2.1	Continue to install fish habitat structures and reconnection of the floodplain where possible	Reduce erosion on 3000 linear feet of streambanks.	SCCD, PA Fish and Boat, DEP	Countywide	2022-2024	Enforcement and lack of knowledge of floodplain ordinances	Design, Installation and Staff	N/A	None	\$75,000/ Year	8/2023 No changes 7/2022 No habitat structures have been installed to date, however many numerous potential project have been looked into for future projects. The Sullivan County Conservation District has partnered with the County Commissioners in development of the Stream Stabilization Program. This program evaluated roughly 40	3 projects to be implemented this year

											sites for potential projects through this program. Numerous projects were identified as potential sites.	
2.2	Continue to Monitor Macroinvertebrates	Track progress of stream health yearly using stream surveys and studies.	SCCD Staff, Mike Bilger	Countywide	2021-2022	Funding Source	Biologist with knowledge to ID Macroinvertebrates (Mike Bilger)	N/A	Biologist with knowledge to ID Macroinvertebrates (Mike Bilger)	\$10,000 / year	8/2023 The SCCD continues to test those areas for macroinvertebrates. 7/2022 The SCCD had collected macroinvertebrates twice as well as had Mike Bilger, formerly of DEP, conduct a study on Black Creek, Lick Creek and the Hoagland Branch.	No changes
2.3	Organize Community Fallen Tree Removal Program for trees that have fallen due to flooding	Reduce streambank erosion with tree removal (5,000 feet).	SCCD Staff	Countywide	2022	Limited funding sources, Limited Resources	Tree Removal	Townships, SCCD	Tree Removal Service in the Area	\$50,000	8/2023 Project is complete, area was roughly 400x40x12 ft. 7/2022 Currently, the SCCD and in partnership with the Sullivan County Commissioners Office are in the process of reducing 400 ft of tree removal that has the potential to cause erosion.	Project complete. Tree removal is apart of other project set to be complete this year.
3.1	Educate landowners on buffers and fertilizer application rates on their lawns.	Install buffers and educate landowners on nitrogen rates.	SCCD	Countywide	2022-2024	Lack of public interest and knowledge	Agronomist, Biologist, Botanist	None	Agronomist, Biologist, Botanist	\$5,000 / Year	8/2023 No changes have been made 7/2022 The SCCD has held one education event that discussed the topic of the application of nitrogen.	No changes
3.2	Develop a strategy to make buffers visually attractive to landowners by using pollinator mixes and flowering trees and shrubs	Plan appealing and effective buffer design to attract public interest.	SCCD	Countywide	2022-2024	Lack of public interest in buffers	Buffer designs and education materials	None	Buffer designs and education materials	N/A	8/2023 The SCCD continues to be a resource for pollinators and providing them to citizens. Not directly related to buffers. 7/2022 No current strategy to gain more	The SCCD provides pollinator mix to the public with larger areas requiring Urban Nutrient Management Plans. Education material is given to them regarding pollinators and their benefits.

Phase 3 Watershed Implementation Plan (WIP) Progress and Milestones Template

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

1. Inputs – These are both existing and needed resources, public and private, to implement the identified priority initiative. These include both technical and financial resources, such as personnel, supplies, equipment and funding.
2. Process – what is each partner able to do where and by when. These are the action items listed under each priority initiative.
3. Outputs and outcomes – both short and long-term. These are the priority initiatives identified by each county. The performance targets are the intermediate indicators that will measure progress.
4. Implementation challenges – any potential issues or roadblocks to implementation that could impede outputs and outcomes.

Asterisk: Place an asterisk next to the action number(s) for action items that appear in both the County Planning and Progress Template and the Programmatic Recommendations Template.

For each Priority Initiative or Program Element: Use the fields, as defined below, to identify the inputs and the process that will be followed to achieve each priority initiative. This is the “who, what, where, when and how” of the plan:

Description = What. This may include programs that address prevention, education, or as specific as planned BMP installations that will address the Priority Initiative. A programmatic or policy effort will require some ability to quantify the anticipated benefits which will allow calculation of the associated nutrient reductions.

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.

Responsible Party(ies) = Who. This is/are the key partner(s) who will implement the action items through outreach, assistance or funding, and who will be responsible for delivering the identified programs or practices.

Geographic Location = Where. This field identifies the geographic range of the planned implementation. This could extend to the entire county or down to a small watershed, based on the scale of the Priority Initiative, range of the Responsible Party, or planned funding/resources. *NOTE: Resource limitations alone should not limit potential implementation as additional funding may become available in the future.*

Expected Timeline = When. Provide the expected completion date for the planned activity. This should be a reasonable expectation, based on knowledge and experience, that will aid in tracking progress toward addressing the Priority Initiative.

Resources Available: Technical & Funding = This field will note technical and financial resources secured/available to implement the program (Description). This is the total of the resources identified in the County Resources Inventory Template below allocated to the priority initiative as a whole; or, if available, to each action.

Resources Needed: Technical & Funding = This field will note technical and financial resources needed/outstanding to implement the program (Description). This is the total of the additional resources projected and identified as needed in the County Resources Inventory Template below allocated to the priority initiative as a whole; or, if possible, to each action.

Potential Implementation Challenges/Issues = This field will note challenges and issues that may delay program implementation (Description).

Progress to Date = This field will be used for annual reporting on priority initiatives. This is a description of the action(s) your county took toward achieving the priority initiative. Examples include education and outreach, programmatic changes, etc. For numeric priority initiatives your county can retrieve those numbers directly from *FieldDoc* or put in the column “See *FieldDoc*.”

Reason for Change to Action Item = This field will be used for two-year milestone updates. This field allows for your county to adjust your original targets and goals based on progress to date. Your county may adjust goals and targets up or down based on your progress to date. This field requires a reason as to the reason of change, whether up or down.