Phase 3 Watershed Implementation Plan (WIP) Programmatic Recommendations Template

Action #	Description	Performance Target(s)	Expected Timeline	Potential Implementation Challenges	Potential Recommendations on Improvement	Resources Needed			
						Technical	Suggested Source	Financial	Suggested Source
Programmatic Initiative 1: Programmatic, Policy and Regulatory Changes									
1.1	Integrate Chesapeake Bay planning efforts with county planning through dedicated personnel available to support local implementation goals and address capacity issues on a county by county basis	**Organizational chart for all participating entities with roles and responsibilities developed** and shared with county planning teams to accompany where to turn for help guide; State level staff hired; Necessary information identified for exchange, reporting criteria and schedule for reports established and data verification process identified;	2022	Integrated staff – should be at DEP level but with frequent interaction and collaboration with county staff. 2-3 staff at DEP for administration of program and at least one dedicated staff for Franklin County. Other counties may require more or less staffing based on pollution reduction goals. Counties are not one size fits all; program needs to recognize and provide support for plan implementation for county's unique needs	Adequate staff to lead program development	Staff will need to be hired to lead and coordinate the WIP program	State/County parts to be determined	State/Local	State/local
1.2 a) b)	Establish a pollution reduction policy that consolidates sediment, nutrient, and stormwater requirements into a single plan for counties within the Cheasapeake 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-boundary inequalities	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 pollution reduction projects in the highest risk area of targeted watersheds. Additionally, they are designed to decrease resentment that arises from inequitable regulations. .	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 regulated areas;	Staff at state and county level	State/local	State/local	State/local

c)	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-MS 4 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							
1.3	Simplify permitting process for installation of BMPs (DEP Water Obstruction and Encroachment and joint DEP/Army Corps of Engineers)	Permit application process simplified and communicated to stakeholders; Decreased wait time for permit approvals; Improved proportionality of effort	2020	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.	Regulatory changes	State	State	State
1.4	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.	2020	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	Admin & regulatory changes	State	State	State

					responsible for project prioritization and implementation rather than grant management and preparation of applications.				
1.5	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	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
1.6	Implement a survey process for capturing current agricultural best management practices that are unreported	Wide scale survey to be completed by 2023	2023	Coordination between agencies, requires EPA to authorize/approve survey methodology and verification; Privacy concerns about data if subject to 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
1.7	Create a systematic process centralized data warehouse for inventorying stormwater management practices and facilities in MS4 and non-MS4 municipalities	Examine existing inventory and database systems in municipalities operating under MS4; Receive cost estimates for countywide deployment of inventory; Capture unreported BMPs on the ground for import into data system	2022	Coordination between local governments, need for consistency of structure at state level Needs to be an owner of the data, identifying that entity Funding for inventory capture and data storage	Establish a database and reporting system	Develop system , train staff	State, local	State, local	State, local
1.8	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.	Staff to revise manual	State	State	State

					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 are applied rather than whether or not they are commodity cover crops or not.				
1.9	Evaluate current system of incentives/penalties for agricultural practices and define enhanced incentive program for BMPs with greatest impact on nutrient loads to get landowner buy in	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	Landowner buy in is a challenge, existing incentive programs don't pay for maintenance, which is a great concern with buffer plantings	Cover crop practices involve costs for equipment, pest management, etc. Incentive programs should account for more than planting alone.	Staff or consultant for review	State	State	State
1.10	Implement a better documentation program for commercial and homeowner nutrient applications in developed lands	Provide support for current fertilizer legislation; Conduct education of commercial landscape industry and homeowners	2020	If Bill doesn't pass, will not be able to implement; Documentation and reporting is a huge challenge	Commercial and home use of nutrients should be evaluated in the CAST model, more data is needed on what application levels currently are	State lead	State	State	State

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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).