

Countywide Clean Water Action Plan Overview

York County

PLAN HIGHLIGHTS

The York County Clean Water Action Plan identifies three Priority Initiatives for York County to make progress improving water quality as it relates to Chesapeake Bay TMDL goals. Within each Priority Initiative are clear Actions that must be implemented for York County to meet the goal of reducing Nitrogen loading by 4 million pounds from our streams and waterways. This would reduce our current estimated loading from 11.9 million pounds to 7.9 million pounds. York County has met its Phosphorous reduction goal, and there is not a Bay goal for Sediment, so Nitrogen is the pollutant of concern and the focus of the Actions in this Plan.

As set forth on the Planning and Progress Template (Template 1), the three Priority Initiatives are *Programmatic Initiatives*, *Achieve Pollutant Reductions*, and *York County Conservation District (YCCD) Clean Water/Healthy Watersheds Program*. A brief description of these initiatives follows.

- *Programmatic Initiatives* identifies policy and funding Actions for York County to undertake in order to improve local water quality. In addition, there are Programmatic Initiatives that the State must undertake to achieve water quality improvement and enable the success of the countywide efforts. The State Actions are on a separate *State Programmatic Recommendations* template.
- *Achieve Pollutant Reductions* lists Actions for implementation through existing MS4 permittees and environmental entities. It also lists concrete Actions for the agricultural community to implement. Both categories of Actions rely on partnerships with municipalities; agricultural landowners and suppliers; federal, state, and local agencies; the York County Stormwater Consortium; Master Watershed Stewards; the Susquehanna Riverkeeper; and others.
- *York County Conservation District (YCCD) Clean Water/Healthy Watersheds Program* identifies Actions for implementation through existing programs administered by the YCCD.

York County applauds PA DEP for taking a new approach compared to previous WIP efforts. The emphasis in the development of this Plan has been on local buy in and partnerships at all levels, including local, state, and federal agencies. Through this approach, we have seen community awareness of local water quality grow. York County still has far to go, but with continued multi-level support and resources, we have the best chance to date of achieving the goal.

KEY FINDINGS

Key findings from the development of this Plan include:

- York County agencies and key stakeholders understand their role within the Chesapeake Bay Watershed and the need to improve local water quality. However, that message isn't widely known or understood in the broader community. Simple and consistent messaging

from federal and state agencies about the problem, the PA approach to address the problem/reach the goal, and the penalties or backstops if we don't achieve the goal would help broaden the understanding of the importance of the Plan.

- The people and agencies involved in developing the Plan appreciated the “bottom up” approach that PA DEP initiated. It helped broaden the message and develop buy in for implementation. There is a desire to have a similar approach used when developing other water quality efforts, such as MS4 permit regulations and agricultural compliance.
- There is a desire for a more holistic approach to improve water quality in general, and to achieve the Chesapeake Bay goals in specific. A more holistic approach would require programmatic changes at all levels and would include: ongoing cooperation and support to maintain partnerships at all levels of government, streamlined permitting for water quality improvement projects within the Bay watershed, consistent enforcement for compliance, recognition of successful efforts, and funding, always funding.

OPPORTUNITIES FOR SUCCESS

York County has several active water quality groups in place that will be key to helping achieve some level of success toward our Nitrogen reduction goal. The York County Coalition for Clean Waters developed the first York County WIP. Thus, they were engaged to develop this Plan as well. The Coalition is an established stakeholder group with representation from various municipalities, the York County Conservation District, the York County Planning Commission, Master Watershed Stewards, the Susquehanna Riverkeeper, the York County Farm Bureau, sanitary treatment plant operators, and others. This Coalition will be a key to implementing the Plan and communicating awareness of its success.

The York County Stormwater Consortium is another established group comprised of municipalities working to implement the York County Regional Chesapeake Bay Pollutant Reduction Plan (CBPRP). The municipalities work together through an intergovernmental cooperation agreement to manage, fund, and implement the Regional CBPRP stormwater BMP projects. They will also be a key group to implementing the Clean Water Action Plan.

The YCCD administers various programs that focus on projects to improve water quality. The District also has a strong working relationship with the agricultural community, which will be important in promoting the implementation of water quality best practices by farmers.

CHALLENGES TO IMPLEMENTATION

As an implementation effort of the Phase II PA WIP, the York County Coalition for Clean Waters developed a County WIP. This first York County WIP relied on voluntary implementation efforts to achieve the goals. Through that effort, we learned that voluntary efforts are not enough, and that lesson carries over into this Plan. This Plan will not be successful if we rely solely on voluntary efforts. To achieve the goals, we will need a designated entity to coordinate, provide assistance, report progress, and assist with verification. This will require funding, staff, and technical resources.

One of our Programmatic Initiatives is the potential formation of a countywide stormwater authority. An authority could not only suffice for the “designated entity” mentioned above, but also provide a funding mechanism to implement the County Action Plan and likewise help the state meet its Phase III WIP. However, the challenge is educating and garnering the support of municipalities, the agricultural community, and the public. Without support, the County Commissioners may not take action to create an authority.

Through development of this Plan, it became evident that achieving compliance and monitoring for ongoing verification is drastically different between sectors. The MS4 permit provides a mechanism to determine compliance and on-going verification for the stormwater sector. The agricultural sector has requirements for Conservation or Ag. E&S Plans, but it is nearly impossible to quantify compliance at the local level. Cooperation and assistance from state and federal agencies is critical if we want to achieve compliance and perform ongoing monitoring and verification of agricultural accomplishments.

The biggest challenge, in our opinion, is implementation of the State Programmatic Recommendations. The recommended initiatives attempt to unify and integrate Pennsylvania’s regulatory agencies so that there is coordination and consistency in providing the technical assistance, support, funding, and direction needed for local efforts to be successful in achieving the Nitrogen reduction goal. It is important to note that these programmatic changes are actually the first steps toward achieving the recommendations in Pennsylvania’s State Water Plan and SRBC’s Comprehensive Plan....Integrated Water Resources Management (IWRM).



The York County Action Plan for Clean Water includes projects that will install riparian buffers and livestock stream crossings on farms to improve water quality.



The York County Action Plan for Clean Water includes stream restoration projects in both urban and agricultural areas. These projects include restoring the stream channel, installing riparian buffers, and reconnection to the floodplain when possible.

PLAN SUMMARY

The York County Clean Water Action Plan consists of four (4) parts: this Narrative, the State Programmatic Recommendations Template, the York County Planning and Progress Template, and the York County Detailed BMP Template. Summarized below are the Action items on the State Programmatic Recommendations and the York County Planning and Progress Templates.

State Programmatic Recommendations Template

This template only includes one priority initiative, which is Recommendations for State Programmatic Changes. The Actions listed are of utmost importance for implementation of the countywide actions and achievement of the Nitrogen reduction goal by 2025.

- Action 1.1 Establish an integrated planning program at DEP within the Chesapeake Bay or Planning office to spearhead implementation of the programmatic changes listed below.
- Develop a method /model/template to capture and report non-permitted BMPs at the municipal level for credit in model/ permit.
- Develop a method/model /template to capture and report non-manure nutrient management.
- Develop a Standardized/
- Centralized system to collect and report all BMP data for credit in the Model, including O & M
- Provide flexibility to combine MS4/ TMDL/WIP III requirements into a single Plan. Implement ONE plan in order to meet all requirements.
- Develop a regulatory model that allows for meeting water quality goals under a results oriented program vs. the current performance based program.
- Establish watershed permits to expedite/ simplify permitting process for similar BMP projects.
- Enforce Act 167.
- Create/establish incentives (positive-economic/water quality; negative-noncompliance penalties) for all stakeholders to comply with State law.
- Utilize Bay Model to establish assigned MS4 Permit baseloads/reduction requirements/ BMP credits so as to eliminate the need for permittee calculations, justifications, and rationale.

York County Planning and Progress Template

This template includes three priority initiatives: Programmatic Changes, Achieve Pollutant Reductions, and York County Conservation District Clean Water/Healthy Watersheds Program. Below is a summary of these initiatives and accompanying Action items.

Priority Initiative 1 - Programmatic Changes

The York County Clean Water Action Plan identifies Programmatic changes for local agencies to implement. The projects and efforts to improve water quality in York County

streams are not coordinated across watersheds, across agencies, or between the different water sectors as identified in the Chesapeake Bay program. Consequently, progress in and by York County is difficult to identify and quantify. The Actions identified in Priority Initiative 1 would create a coordinating entity that would identify priority locations for improvement, fund projects, and monitor water quality to identify and quantify improvement.

- Action 1.1 Form a Countywide Stormwater Authority in order to develop a sustainable, efficient, responsible County entity that can fund, administer, coordinate, and achieve Countywide water quality/flooding efforts on behalf of all County stakeholders including the agricultural community, municipalities, industrial/commercial entities, and residents.
- Action 1.2 Continue to implement the County Comprehensive Plan that calls for development/land use strategies that restore/preserve water resources.
- Action 1.3 Establish staffing/funding program that provides realistic resources to achieve agricultural planning and implementation obligations.
- Action 1.4 Establish a sustainable real time stream monitoring network Countywide that will establish local water quality trends, impairments, hotspots, and restoration BMP needs. In the future, this system should indicate/verify countywide progress toward WIP 3 goals.

Priority Initiative 2 - Achieve Pollutant Reductions

Priority Initiative 2 includes Actions proposed by municipalities that are MS4 permittees and are participating in the York County Stormwater Consortium to implement projects from the Regional Chesapeake Bay Pollutant Reduction Plan. It is important to note that while these projects have a dedicated funding source for implementation, that funding is not sufficient to implement the full array of projects. Participating municipalities are seeking additional funds, such as grants, to carry out projects. Additionally, many of these projects focus on maximizing sediment reduction (local waterways goal)' while the York County goal for the Phase 3 WIP is Nitrogen reduction (Chesapeake Bay goal). There are also numerous Actions listed for agricultural projects, which provide greater reductions in Nitrogen, but do not have a dedicated funding source identified or property owner approval for implementation. Both categories of Actions need dedicated staff to manage the projects through implementation and on-going verification.

- Action 2.1 Establish a set of BMPs that will achieve desired pollutant reductions in an efficient and cost effective manner (see BMP template)
- Action 2.2 Encourage and provide support to municipalities to incorporate green infrastructure (GI) and Low Impact Development (LDI) into land use ordinances
- Action 2.3 Support local and County initiatives for pollutant reducing activities

- Action 2.4 Develop/advertise a performance-based RFP seeking bids to site, design, install, operate, and maintain BMPs to reduce a specified amount of sediment to meet PRP goals and shortfall of WIP 3 nitrogen goals in the County.
- Action 2.5 Tree Planting - Canopy
- Action 2.6 Bio swale
- Action 2.7 Forest Buffer
- Action 2.8 Wetland Restoration
- Action 2.9 Infiltration Basin
- Action 2.10 Bio retention/ Raingardens
- Action 2.11 Stormwater Performance Standard- Stormwater Treatment
- Action 2.12 Stormwater Performance Standard - Runoff Reduction
- Action 2.13 Urban Stream Restoration
- Action 2.14 Nutrient Management Plan (urban)
- Action 2.15 Land Retirement to Ag Open Space
- Action 2.16 Nutrient Management Core N
- Action 2.17 Nutrient Management Core P
- Action 2.18 Nutrient Management N Rate
- Action 2.19 Nutrient Management N Timing
- Action 2.20 Tillage Management- High Residue
- Action 2.21 Tillage Management-Conservation
- Action 2.22 Cover Crops Traditional
- Action 2.23 Animal Waste Management System
- Action 2.24 Barnyard Runoff Control
- Action 2.25 Precision Intensive Rotational/ Prescribed Grazing
- Action 2.26 Non-Urban Stream Restoration
- Action 2.27 Grass Buffer (ag)
- Action 2.28 Forest Buffer (ag)
- Action 2.29 Manure Incorporation
- Action 2.30 Off Stream Watering without fencing
- Action 2.31 Tree Planting
- Action 2.32 Soil Conservation and Water Quality Plans
- Action 2.33 Wetland Restoration – Floodplain (ag)

Priority Initiative 3 - York County Conservation District Clean Water/Healthy Watersheds Program

Priority Initiative 3 includes Actions for implementation by the York County Conservation District (YCCD) through the Dirt and Gravel Road (DGR) and Low Volume Road (LVR) Programs to control erosion and sediment runoff. It also includes Actions that YCCD will implement with the Exelon settlement funding it administers. Although dedicated funding sources exist, the existing funds provided for the DGR and LVR Programs need to be increased and/or other funding sources sought to achieve the full array of actions.

- Action 3.1 Erosion & Sediment Control Level 2
- Action 3.2 Dirt & Gravel Road (DGR) Erosion & Sediment Control-Driving Surface Aggregate + Raising the Roadbed [includes Low Volume Road (LVR) projects]
- Action 3.3 Dirt & Gravel Road Erosion & Sediment Control - Driving Surface Aggregate with Outlets (includes LVR projects)
- Action 3.4 Dirt & Gravel Road Erosion & Sediment Control - Outlets only (includes LVR projects)
- Action 3.5 Forest Buffer
- Action 3.6 Forest Buffer-Streamside with Exclusion Fencing
- Action 3.7 Grass Buffer – Streamside with Exclusion Fencing
- Action 3.8 Forest Buffer – Narrow with Exclusion Fencing
- Action 3.9 Grass Buffer – Narrow with Exclusion Fencing
- Action 3.10 Grass Buffer
- Action 3.11 Grass Buffer- Narrow
- Action 3.12 Non-Urban Stream Restoration - Floodplain
- Action 3.13 Urban Stream Restoration
- Action 3.14 Wetland Restoration – Headwater
- Action 3.15 Wetland Restoration – Floodplain
- Action 3.16 Wetland Creation – Floodplain
- Action 3.17 Wetland Creation – Headwater
- Action 3.18 Wetland Enhancement