Phase 3 Watershed Implementation Plan (WIP) State 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: Recommendations for State Programmatic Changes									
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.	With the WIP 3 philosophy of local plans/effort to meet State requirements, this action is necessary to integrate water programs at the State level and make local efforts possible.	2020	Development of staff consisting of state and local planners knowledgeable of integrated water resource planning. Costs associated with staffing, meeting, planning, either added planning department and/or expanding existing departments. Convincing regulatory/political agencies of the need/benefit for sound integrated planning/implementation. Having constant attendance by the same State/County staff due to complexity/specialized needs of integrating water issues/programs.	Dedicate a leadership entity within DEP to promote and implement collaboration, integrated water resource planning, and permitting changes that are important to the success of the PA WIP and County Action Plans. The collaborative planning team should contain at least a county planner (county level is the entity that has the big picture from local up to Federal level) Integrated planning means not only local/county/state collaboration…but also all DEP water related departments collaboration/participation The financial resources spent to do prudent integrated water planning should actually be offset by increasing efficiency of water related initiatives, reducing redundancy, and providing stacked benefits	Dedicated staff to lead coordination, planning and integrated water resources management efforts at least at the State and County/ municipal level	Dedicated DEP planning staff to lead integrated planning efforts. Staff from State Departments (Ag, DCNR, PennDOT, etc.) to participate in planning meetings. County staff dedicated for participation.	At least 2 dedicated Integrated planning staff at DEP and 1 at each County. Participation by other State departments $6M	DEP/Dept Ag/DCNR general funding.
1.2	Develop a method /model/template to capture and report non-permitted BMPs at the municipal level for credit in model/ permit	Acceptable method to capture municipal SW BMPs not needing a Chapter 102 permit	2023	Municipal resources, DEP resources, DEP involvement, will credit be worth effort? Limited municipal resources make added work difficult to achieve without added funding sources.	Any municipal stormwater ordinance requiring s/w management for development less than an acre is above and beyond the law. A standard system of tracking and reporting these BMPs is necessary to enable municipalities/PA to get pollution reduction credits.	State/County /Municipal staff	DEP/County planning and/or Conservation Districts to develop template and then Municipal staff to track/report.	Cost of added municipal staff work.	DEP
1.3	Develop a method/model /template to capture and report non-manure nutrient management	A method developed to encourage, perform, capture, and report the 4R program	2023	Will require close coordination and cooperation between regulatory agencies, private fertilizer companies, & farmers to achieve statewide model. Requesting fertilizer companies to participate in a program that could potentially reduce sales.	Dept Ag/DEP /farmers to coordinate at State level with the fertilizer industry; State or Baywide system needed for consistency. Added pollutant reductions reported from work already being done.	State ag/farming/ fertilizer industry experts	DEP/willing farmers/ fertilizer companies	Tracking/ reporting expenses not offset by increased production for farmer.	DEP/Dept Ag/DCNR general funding.

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1.4	Develop a Standardized/ Centralized system to collect and report all BMP data for credit in the Model, including O & M	A standardized/ centralized data collection and reporting system	ASAP	Will need to address privacy concerns; may need changes to Right to Farm Act.	York Co online BMP reporting tool developed by the Chesapeake Conservancy or the Second Nature planning and reporting tool could potentially be modified for this purpose; York Co IWRP Flowchart Tool should also be explored.	State Ag staff/ Conservation districts/ County/ municipal planners/soft ware experts	DEP/Dept. Ag/ Municipalities/ County staff	Software costs/staff costs	DEP/Dept Ag/DCNR general funding.
1.5	Provide flexibility to combine MS4/ TMDL/WIP III requirements into a single Plan. Implement ONE plan in order to meet all requirements	Elimination of WIP 3 sectors; Planning areas include entire jurisdiction; If countywide WIP 3 Plan is being implemented, it can be cited for MS4 Permit PRP/ TMDL Plan requirements	2023	EPA/DEP flexibility to allow MS4 Permittees to reduce required pollutants across entire jurisdiction; Present MS4 Permit reduces local effectiveness. May involve EPA flexibility/buy in. Requires collaboration/coordination/ involvement/ commitment by DEP/State departments/ counties/municipalities. Change in way of thinking/doing business.	Counties and municipalities need to be involved when developing MS4 Permits/ regulations PRIOR to and in addition to, public comment. Needs to be a partnership at all levels.	Included under Action #1.1	Included under Action #1.1	Included under Action #1.1	DEP/Dept Ag/ DCNR general funding
1.6	Develop a regulatory model that allows for meeting water quality goals under a results oriented program vs. the current performance based program	Water Quality Monitoring system created that promotes a results oriented verification/ reporting/ permitting system; Water quality data dictates what needs to be done and where	2025	Permit changes that allow the use of water quality data to demonstrate permit compliance; Permitting Authority coordination with permittees to achieve flexibility. Change in philosophy. EPA buy-in. Delay in obtaining enough trend data to utilize for interpretation (not immediately useful).	Money savings in reporting/reviewing/assessing/ can be invested in expanded data base and enlarging real time sampling system Administrative savings for MS4s may provide incentives to fund such expanded water sampling resulting in stacked benefits for State, Federal, regional, and academic agencies.	Monitoring equipment, installation, monitoring, and O&M. Data interpretatio n, storage, and QC.	USGS/SRBC/DEP /County	$300,000 annually	DEP/general funds/grants/ SRBC/York County
1.7	Establish watershed permits to expedite/ simplify permitting process for similar BMP projects	Establishment of a watershed permit	2023	Permitting Authority flexibility. Perceived reduced resource protection.		Included under Action #1.1	Included under Action #1.1	Included under Action #1.1	Included under Action #1.1

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1.8	Enforce Act 167	All municipal SWM Ordinances consistent with County Stormwater Management Plan and being enforced.	2025	DEP staffing; Act 167 "consistent" criteria definition. Act 167 plan development cost could be greatly reduced if York County's Act 167 Plan was used as a model. Savings of plan preparation could then be directed to municipal staff to implement the plan, including tracking & reporting of BMPs .		2 Act 167 enforcement staff	DEP	$150,000	DEP general fund
1.9	Create/establish incentives (positive-economic/water quality; negative-noncompliance penalties) for all stakeholders to comply with State law	Funding to implement BMPs and funding for regulatory agencies to meet responsibilities under established laws /regulations	ASAP	Political will; this includes county Storm Water Management (SWM) Plans and subsequent municipal SWM ordinances which will result in development that addresses water quality.	Give municipalities in compliance with Act 167 credit/incentives toward MS4 Permit requirements. All municipalities that have land use authority should also have MS4 Permit requirements to address the impacts of that land use authority.	PA needs to adequately staff State agencies to carry out program responsibilities	DEP	Estimated cost to achieve PA's WIP III obligation alone is $380M	State Budget
1.10	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	Permit assignment issued directly to permittees based on Bay Model so all Chesapeake Bay efforts are based on uniform criteria	2023	Change in philosophy. Bay Model may not be accurate/usable at municipal scale. Current MS4 permit identifies municipal level data but requires costly calculations. Various DEP/State programs attempt to manage/administer programs at differing scale which isolates these programs into "silos' rather that working at the same scale in order to overlap/stack efficiencies of all programs (watershed scale…State Water Plan/Act 167, county scale…WIP III, municipal/partial municipal scale…MS4).	Utilize the resource developed for tracking/ improving/validating water quality for the Bay (CAST). Interpolate for the municipal level if need be for PLANNING purposes so that municipal money being spent on mapping, calculating, designing projects for PRPs can be utilized for BMP installment.	Existing CAST resources	EPA/DEP	No more than existing.	EPA/DEP/ municipalities

Phase 3 Watershed Implementation Plan (WIP) Planning and Progress 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

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 though 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)