



Citizens Advisory Council

to the Department of Environmental Protection

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May 22, 2019

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Veronica Kasi
Program Manager
Chesapeake Bay Program Office
Department of Environmental Protection
P.O. Box 8555
Harrisburg, PA 17105

Dear Ms. Kasi:

Thank you for the opportunity to provide the Department of Environmental Protection (DEP) comments on Pennsylvania's Draft Phase 3 Chesapeake Bay Watershed Implementation Plan (WIP). The following comments were adopted by the Citizens Advisory Council (CAC) at our May 22nd meeting.

General Comments

CAC applauds DEP and its sister agencies for the strategy employed to develop this draft WIP. As the WIP states, there was an unprecedented effort to involve stakeholders from all levels and all sectors. These stakeholders can see their direct input reflected in the WIP which will, in turn, make implementation an easier task. CAC encourages DEP to employ this type of collaborative framework more often in all programs to build consensus on sound, practical environmental policies.

Additionally, while the Chesapeake Bay TMDL is a federal mandate, the focus on the WIP's impact on local water quality is of utmost importance. The environmental, public health and welfare, and economic gains Pennsylvania will realize from improving local water quality will be significant and should be a priority for the General Assembly and the Governor's Office regardless of federal requirements.

State Actions

The most important challenge facing Pennsylvania's WIP implementation is funding. As outlined in the WIP, a \$257 million per year funding gap must be filled for all stakeholders to have the resources they need to meet the Commonwealth's legal obligations. CAC is encouraged that the Funding Workgroup's membership included members from the General Assembly, the Governor's Office, and external stakeholders. That being said, it is important for all involved to continue the vigorous pursuit of the passage of appropriate, fair and predicable funding legislation and not lose the momentum that has been built through the development of the WIP.

CAC is concerned, however, that the draft WIP only contains vague concepts of funding solutions. We suggest that the final version of the WIP include more concrete ideas including the amount of funding to be generated by each initiative and how that will impact citizens and enterprises in this Commonwealth. CAC would be happy to help in any way we can to close the funding gap, including using CAC meetings to invite the public to learn about various funding efforts and the impact they will have on their day-to-day lives. Additionally, CAC suggests that the obstacles preventing implementation of public-private partnerships, as discussed on page 56 be further elaborated on with specific suggestions for overcoming those issues offered in the final WIP.

CAC was also pleased to see that the WIP includes a commitment by executive branch agencies to increase the implementation of BMPs on state lands. It is imperative that the Commonwealth lead through example instead of solely through oversight and enforcement. Initiatives like this will help instill trust in the government when private stakeholders are asked to take the same actions.

Countywide Actions

CAC commends all those involved in the Four County Pilot Project. This project shows the commitment the Commonwealth has to successfully implement the Phase 3 WIP. Instead of waiting for the WIP to be finalized before developing all Countywide Action Plans (CAPs), the four counties involved not only got a head start on their own implementation but will also provide examples of CAPs that all other counties can reference when beginning their work under the WIP. When time is of the essence as it is with the Bay TMDL, this pilot project made the most of it through early engagement of high-priority counties. CAC encourages DEP to continue to discuss with the remaining counties the local benefits that they will receive from participating in this project. CAC would be happy to assist in message delivery and outreach initiatives for the remaining counties.

CAC is happy to lend its support and help in any way we can to help with the implementation of the WIP. If you have any questions or would like to discuss this further please contact our Executive Director, Keith J. Salador, by phone at 717-787-8171 or by email at ksalador@pa.gov.

Sincerely,



Jerome Shabazz
Chair
Citizens Advisory Council