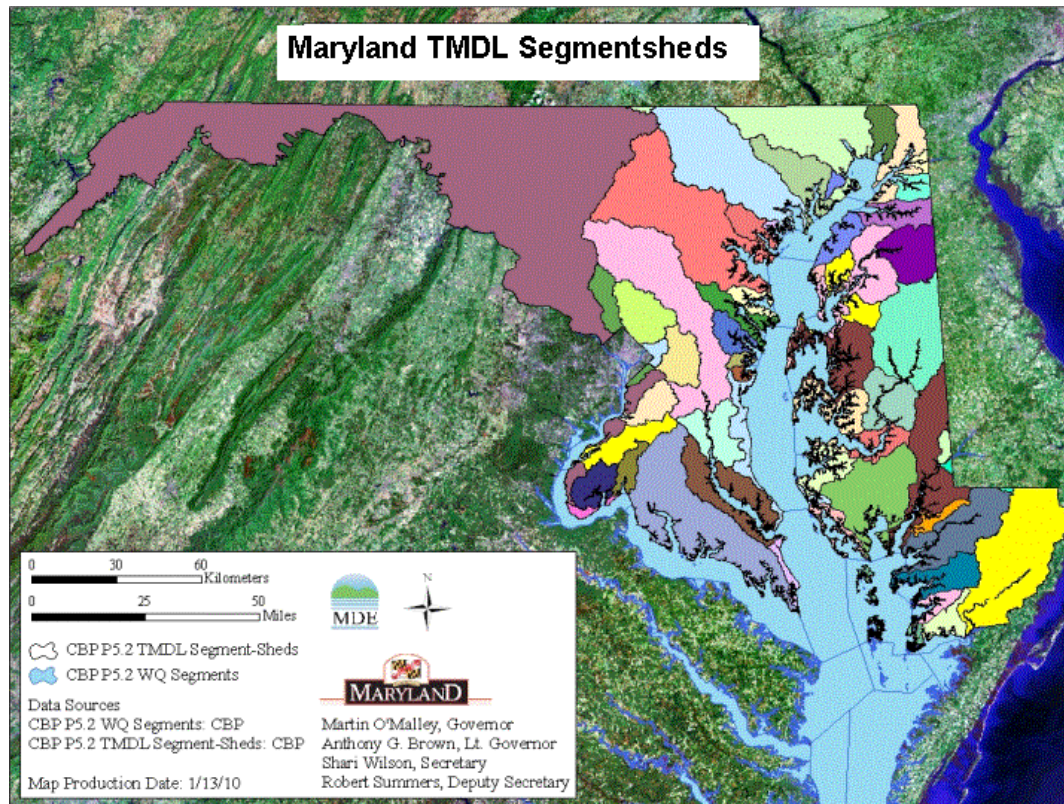


Phase II WIP



Update

- MDE will submit a strategy that meets EPA's requirements that includes **as much local input as possible**.
- EPA is willing to consider revisions to the “final” WIP after March 30, **in response to comments** during the comment period Feb. – March, 2012 on the WIP and the subsequent TMDL.
- This effectively allows more time to deliberate, discuss, decide and approve local plans.

Update

- This also allows elected officials and budget managers to take into account any new funding and regulations resulting from the 2012 General Assembly session to suggest positive revisions to the WIP for FY2013 milestones.
- Allocations and 2009 Progress results are now available; 2010 Progress shortly.
- You need to stay focused to provide as much local input to the Maryland WIP as possible.

Refresher: MAST

- Maryland Assessment Scenario Tool:
 - Available online
 - Estimates loads and
 - Manages and compiles multiple scenarios for State WIP development.
- Consistent with Bay model loads and BMPs
 - Organized by team and sector
 - Multiple scale input.
- Outputs results for comparison to allocations.

To Be Continued

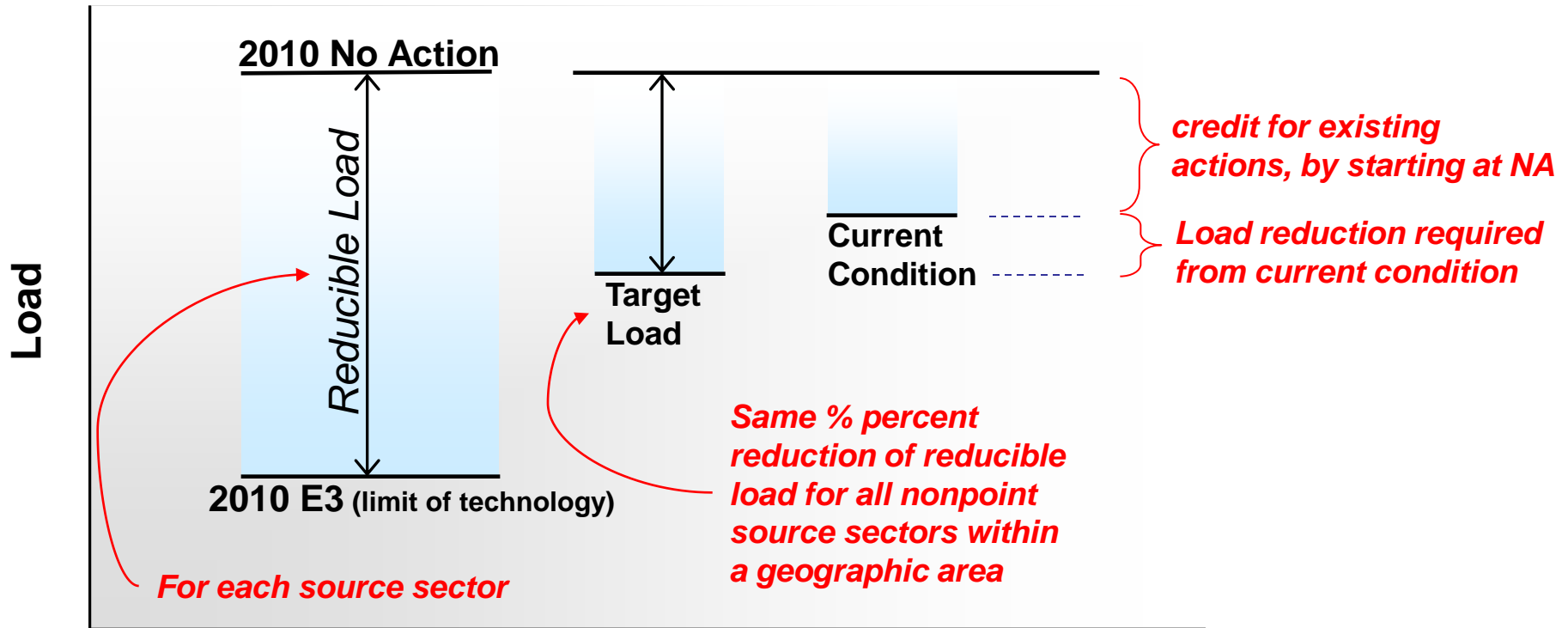
Accountability Framework

- TMDL implies greater regulatory influence
- Watershed Implementation Plans
- Tracking & Evaluating Progress
- 2-Year Implementation Milestones
- Federal “Consequences”

Federal Consequences

- Most likely consequences. EPA can:
 - Object to NPDES permits to require additional reductions from point sources;
 - Expand NPDES permit coverage to currently unregulated sources; and
 - Increase and target federal enforcement and compliance assurance

Urban, Ag, Septic Loads



What is a Strategy?

- Strategy:
 - Which Best Management Practices will be implemented?
 - To what extent (acres, extent of applicable land use, structures) will they be implemented?
 - When will implementation take place (Time line = Milestones)
 - How will it be funded?
- WIP is broader and includes other stuff.

Milestone development

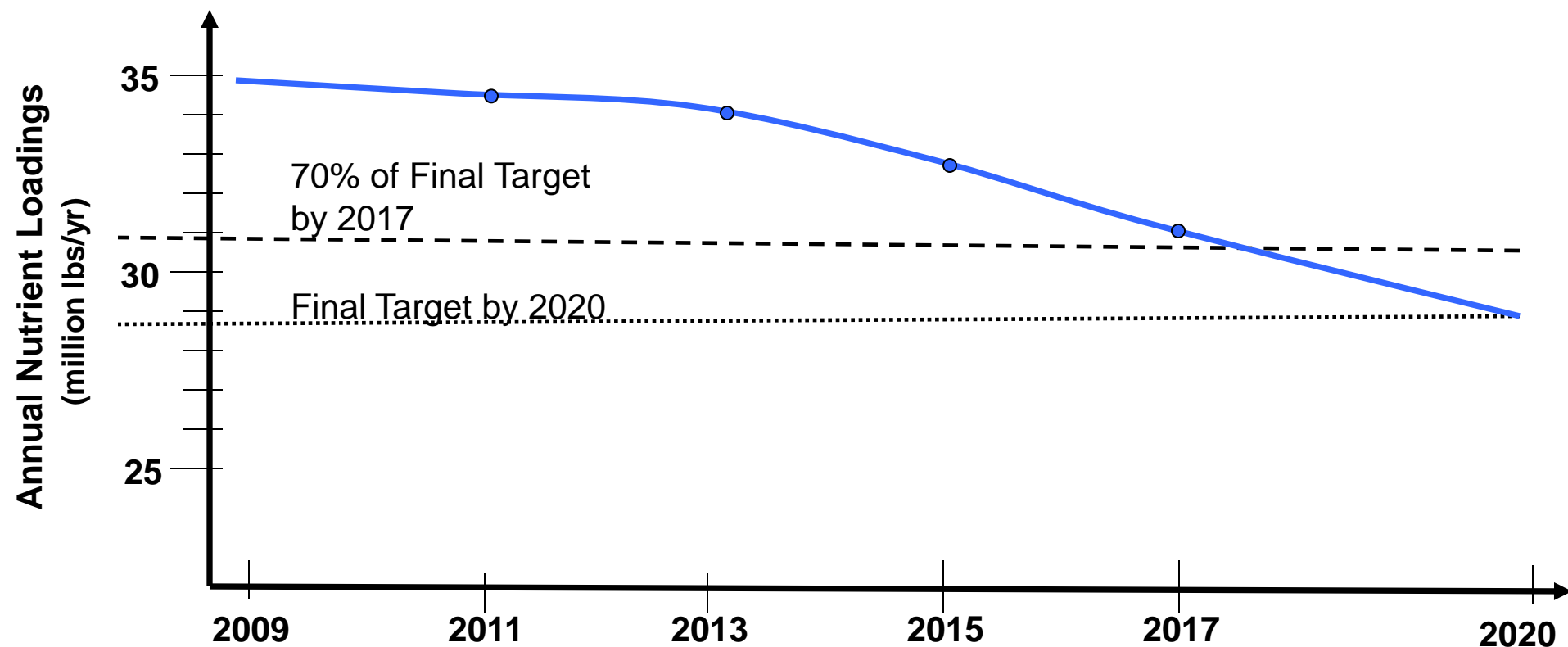
- Milestones are critical to the new accountability framework.
- Satisfactory progress will be judged based on milestone attainment.
- The milestones will also need to show how you achieve 70% of your implementation by 2017.

2-Year Milestones

- 2-Year Milestones have Two Main Elements:
 1. Implementation Milestones (BMPs & Load Reductions)
 2. Program Development Milestones
- Primary Task = 2013 Milestones:
 - 2012-2013 Milestones (July 1, 2011 – June 30, 2013)
- Relation to WIP Development:
 - BMP Implementation Milestones:
 - Build on existing activities/budgets. If you have no existing program, then focus on Program Development Milestones.
 - Program Development:
 - Align with WIP Strategy Schedule Steps for 2011-2013
 - Plan Beyond 2013 Milestones with projected nutrient reductions

2-Year Milestones (Con't)

- Relation to WIP Development:
 - Begin thinking about 2015, 2017 Milestones
 - Include Load Reduction Trend Plot in Phase II WIP



Basic Expectations of WIP

- **This is general guidance; more specifics have been distributed to teams**
- **Interim & Final Target Loads from MDE**
- **Strategies to Meet Targets**
 - Strategy Narrative: approach to implementation, past successes, future challenges; explain your decisions to your citizens.
 - Load Reduction Analysis (Strategy)
 - Cost Estimate & Approach to Address Funding Gap
- **2-Year Milestones:** Loads and strategy for 2013; loads out to 2020.
- **Contingency Strategies**
- **Tracking, Reporting and Verification**
- **Accounting for Growth in Loads**

MAST – A Planning Tool

MAST CAN ANSWER:

- Did I meet the allocations?
- Am I hitting the targeted load?
- Which BMPs or combination of BMPs give the greatest load reductions?

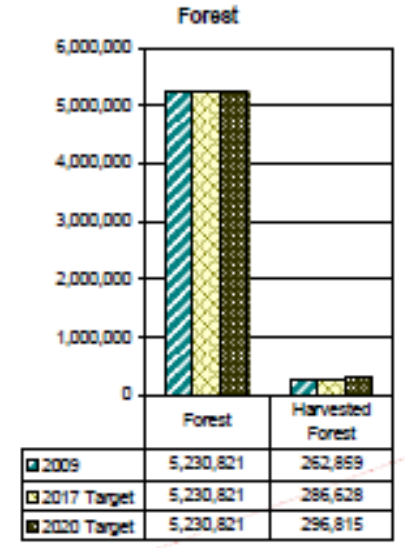
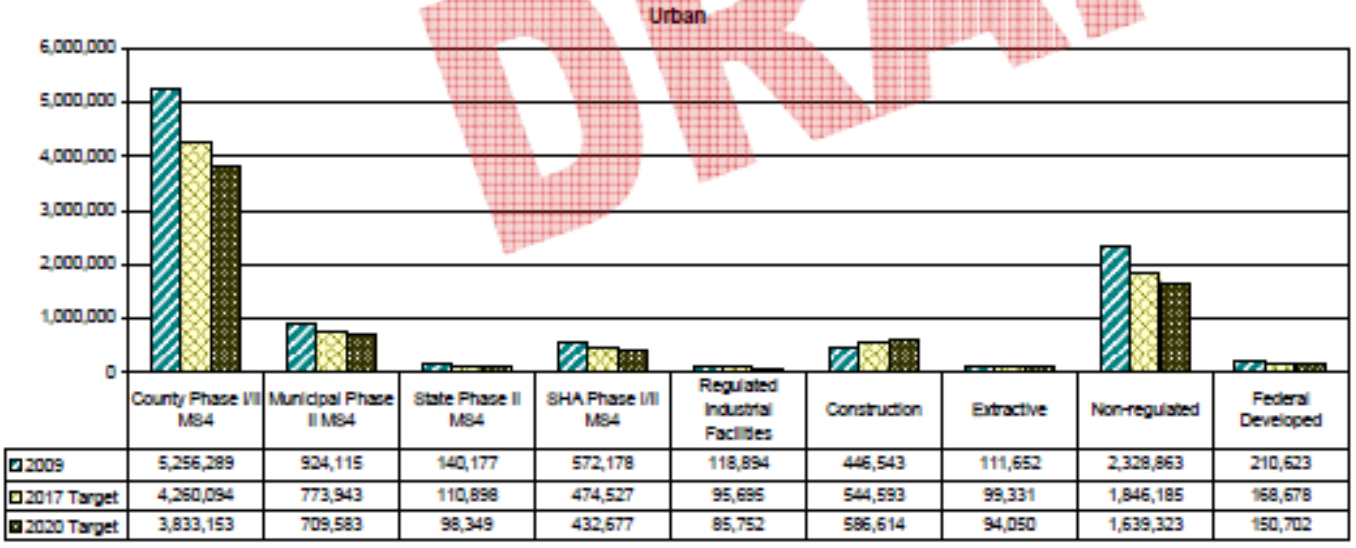
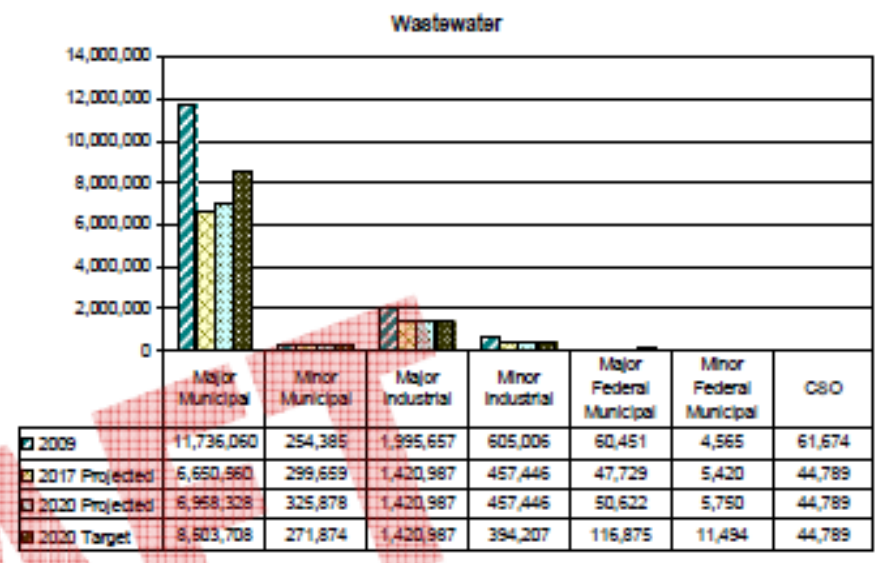
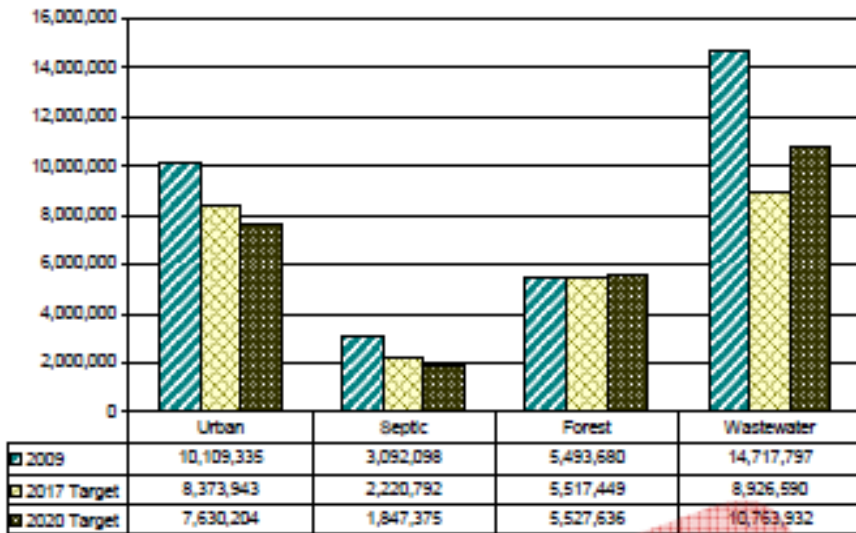
YOU NEED TO KNOW:

- Which BMPs are most appropriate for your areas and provide the greatest opportunities
- Target load
- Land use definitions

YOU DO **NOT** NEED TO KNOW:

- Calculations and formulas

Phase 2 - Maryland (Non-Federal & Federal) Total Nitrogen Loads, Delivered

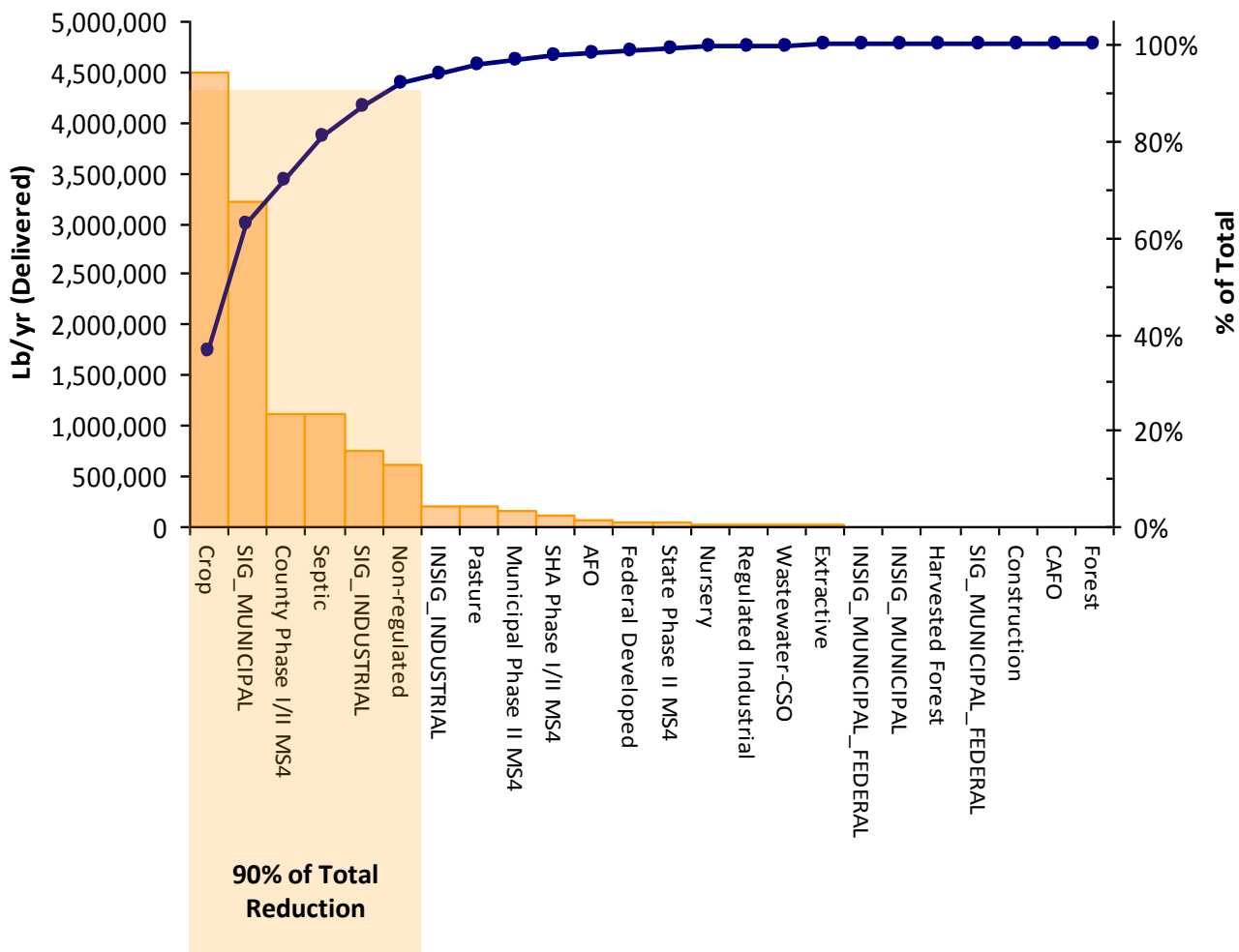


DRAFT

Allocation Adjustments

- The allocations are targets for how we populate MAST.
- May look different in final strategies:
 - Reduction efficiencies may result in slightly different distributions of loads.
 - Meeting both N and P could also slightly change the allocations.

MD Statewide TN Load Reduction From 2009 to Meet Final Target



Costs

- There is a greater cost savings and delivery of ecosystem services with a mix of practices
- Least cost base scenario is:
 - 1/3 “Gray” practices (WWTPs, SW retention basins), and
 - 2/3 “Green infrastructure (Agriculture and stormwater management BMPs like green roofs.)

Working Together

- Because of limitations of the land use in the Bay Model, we cannot provide specific allocations to every unit.
- The allocation handouts show the level of specificity, which goes beyond the Bay Model.
- Counties and State Highways will receive specific allocations.
- If there is a single federal facility or Phase II municipality in a county, they will also get specific allocations.

Working Together

- The model has federal land and Phase II MS4s as aggregates, so we will need to break that out for you separate from MAST.
- We will provide this disaggregation in early October with guidance.
- Federal facilities and Phase II MS4 jurisdictions are the priorities for resolution.

Working Together with MAST

- Teams will need to bring three pieces together:
 - The County strategy.
 - The agriculture strategy.
 - The aggregate strategy for:
 - Phase II MS4 jurisdictions
 - State Highways
 - Individual allocations for state and federal facilities, and
 - Any other locations with only a percent reduction.

Importance of a Funding Plan

- Recall that the WIP is about “reasonable assurance” that the TMDL will be achieved.
- Without a funding plan, the assurance is not reasonable.
- It does not have to be for the whole plan, but does need to show how:
 - All permit requirements will be met,
 - Significant progress can be made,
 - How 2012-2013 milestone will be met.

End Game

- Should start drafting the narrative part of WIP Plan: Successes, challenges, general approach
- Should have completed capacity analysis by now.
- Should be working on funding strategy and milestones.
- Should be working on preferred BMPs and determining opportunities.