

Tips for Drafting Comments on Pennsylvania's Draft Phase III Watershed Implementation Plan

1 READ

Read the [Phase III Draft WIP](#) and any [local county plans](#) that apply to the area in which you are interested.

The WIP plan

Read the full document.

If you are crunched for time, here are the key sections you may want to focus on:

- [Executive Summary](#)
- [SECTION 2. STATE ACTIONS](#)
- [SECTION 3. COUNTYWIDE ACTIONS](#)
- [SECTION 5. EXISTING AND NEEDED RESOURCES](#)
- [SECTION 10. CONCLUSION](#)

County Plans

4 pilot counties developed county-level WIPs: Adams County, Franklin County, Lancaster County, and York County (as of May 2019). 39 other counties will also write local plans; these plans are still under development. Read county-level WIPs if you live in or are interested in how pollution reductions will be made in these counties.

2 RESEARCH

Talk with your local municipal staff working on creating the local WIP documents.

Ask DEP any questions you have once you have read the WIPs.

Read background materials:

- [EPA's expectations for all phase III WIPs](#);
- [EPA's expectations for Pennsylvania's Phase III WIP](#);
- [EPA Evaluation of Pennsylvania's 2016-2017 and 2018-2019 Milestones](#);
- Center for Progressive Reform – [Evaluation of 2019 State Watershed Implementation Plans](#); and
- Review comments submitted by others on [DEP's eComment tool](#).

3 WRITE

Content

Be as clear and concise as possible in your written comments.

Support your claims or opinions with facts, evidence, primary sources, etc., where possible.

Highlight key areas where the plan is strong:

- What are the key opportunities for success you see?
- What has the plan done well?

(Remember that everyone likes to feel good about the work that they have done.)

Address any challenges to implementation you see:

- Does the document provide “reasonable assurance” that nonpoint source controls will achieve the load reductions required of the state by the cleanup plan?
- Do you think the plan will enable the state to meet its 2025 water cleanup goals?
- Are there any gaps or challenges that might prevent the state from reaching its 2025 cleanup goals?
- What resources will be needed that are not included and should be included in the final document?
- What types of resources do local municipalities need to draft local WIP documents and accomplish local WIP goals?

Suggest alternatives, including different options to help meet 2025 cleanup goals:

- Are there issues or opportunities that the plan leaves out?
- Does the plan need to focus more or less on specific sources of pollution?
- How can funding shortfalls indicated in the plan be filled?

Share any resources you, your community, and/or your organization can provide during implementation.

Format

- Address to:
 1. Tom Wolf, Governor;
 2. Patrick McDonnell, Secretary, Commonwealth of Pennsylvania Department of Environmental Protection.
- Subject line: [author name] Comments on Pennsylvania’s Draft Phase III Watershed Implementation Plan;
- Include the date;
- Include individual or organizational name, address, contact information;
- Save your comments as a Word or PDF document;
- If you include attachments, be sure to include your name and contact information on each;
- Incorporate by reference any previous comments you have sent to DEP or the state about the WIP;
- Include page numbers; and
- Include a signature block at the end of the document.

4 SUBMIT

Comments are due by Friday, June 7, 2019 on or before 11:59 p.m. Eastern standard time.

Submit online: www.ahs.dep.pa.gov/eComment.

- The WIP document is listed as: [Pennsylvania's Draft Phase 3 Chesapeake Bay Watershed Implementation Plan](#);
- Click on “Submit Comments”;
- Comments may be entered in the “Your Comments” text box and/or by attaching comments in the “Attached Comments” box (10,000 character limit).



Email or Mail

- If don't have access to the online eComment tool, you can submit by email or mail.
 - Email to: ecomment@pa.gov;
 - Mail to: Department of Environmental Protection, Policy Office, Rachel Carson State Office Building, P.O. Box 2063, Harrisburg, PA 17105-2063.

Do not fax

5 TRACK

After the comment period closes, DEP reviews all comments and develops responses to those comments. EPA will send its feedback on the draft to Pennsylvania and other jurisdictions in early June. DEP will consider all comments and finalize the WIP document. The final WIP document will be published late this summer on the DEP website.

6 ACT

Work with your community and local and state leaders to engage directly in the implementation of the Phase III WIP. The final plan is just the first step – after the plan is finalized, the complex on-the-ground work and partnering to accomplish the goals set-out in the Phase III WIP document begins. A key area to watch will be whether sufficient funding and technical assistance is available and provided to meet all the goals discussed in the plan. You should also keep an eye out for how the state continues to address impacts from climate change and Conowingo Dam when working toward the 2025 cleanup goals.

7 QUESTIONS?

Mary Clemmensen
Senior Attorney
Director, Legal Innovation
Chesapeake Legal Alliance
(410) 216-9441
mclemmensen@chesapeakelegal.org
<https://www.chesapeakelegal.org/>

Molly Brown
Senior Attorney
Director, Community Legal Education
Chesapeake Legal Alliance
(410) 216-9441
mbrown@chesapeakelegal.org
<https://www.chesapeakelegal.org/>

