



Phase III Watershed Implementation Plan (WIP) Summary

Watershed Implementation Plans (WIPs) – The specific form of state implementation plans developed as part of the Bay TMDL Phase I WIPs were finalized by each of the Bay states and the District of Columbia in December 2010; Phase II WIPs were finalized in 2012. A third phase is due this year.

Status

- Maryland expects to meet the deadline for issuing Phase III WIP; state will provide sector allocations then. Likely to rely on temporary use of wastewater sector's unused capacity (wastewater target to be based on 3.25 milligrams/liter TN). MS4 permitting is on a separate track. State plans an additional set of regional meetings as well as meetings with individual counties.
- Virginia expects to meet the deadline for issuing Phase III WIP; state is revising the Load Allocation plans produced by Planning District Commissions, including Northern Virginia Regional Commission's plan. MS4 permitting implications are still unclear. The load allocation plans as originally submitted for the stormwater, septic and agriculture sectors are all likely to come up short of the 2025 targets. Virginia holding more statewide and regional meetings.
- The District of Columbia expects to meet the deadline for issuing Phase III WIP; DC's Department of Energy and the Environment expects to prioritize reductions in its stormwater sector in addition to its wastewater sector. It is working with federal partners and other stakeholders to craft plans for the stormwater sector that go beyond MS4 permitting requirements. The District of Columbia plans to address climate change numerically in their WIP.

Deadlines

- April 12, 2019 – States' Draft Phase III WIPs due to EPA
- June 7, 2019 – Deadline for public comment on draft Phase III WIPs
- August 9, 2019 – Final Phase III WIPs due to EPA

Key Actions and Implications for COG Members

1. Final Phase III WIP Planning Targets – Finalized on July 9, 2018

- Set the stage for States/District to begin working with local governments to develop the Phase III WIPs

Jurisdiction	Planning Target (millions of pounds per year)	
	Nitrogen	Phosphorus
District of Columbia	2.42	0.130
Delaware	4.55	0.108
Maryland	45.78	3.680
New York	11.53	0.587
Pennsylvania	73.18	3.044
Virginia	55.73	6.192
West Virginia	8.22	0.432

Impact on level of effort:

District of Columbia: Although certain aspects are still to be determined, the level of effort (LoE) required to meet the District's Phase III WIP targets is slightly more than it was under the Phase II WIP for nitrogen and about 10 percent more for phosphorus. However, because of substantial reductions in the wastewater sector, the District in 2017 has already achieved its final planning target reductions.

Virginia: Although certain aspects are still to be determined, the LoE required to meet Virginia's Phase III WIP targets is currently less than it was under the Phase II WIP. As is true in Maryland, however, substantially more effort will be required to meet the N target than the P target.

Maryland: Although certain aspects are still to be determined, it is clear that Maryland's LoE, particularly for N reductions, will have to increase substantially for the state to meet its Phase III WIP targets compared to its LoE under the Phase II WIP.

2. Impact of Conowingo dynamic equilibrium – to be addressed in separate WIP due June 2019

- Still uncertainty regarding whether the separate reductions under a Conowingo WIP will affect the COG region
- CBPC sent letter to PSC in August 2018 stressing the need for COG region input into the development of the Conowingo WIP

3. Impact of Climate Change – to be addressed under the WIPs by 2022

- Preliminary conclusion is that climate change would add the equivalent of 9 million additional pounds of nitrogen to the Bay by 2025
- Models are currently being revised and will be finalized by 2021
- Bay Partners have agreed to quantitatively address climate change impacts in the WIPs by 2022. The District of Columbia is planning to address in their WIP, in advance of 2022.