

Delaware Health and Social Services Intended Use Plan 2019 Federal Allocation

Background

The Intended Use Plan (IUP) is a document that Delaware Health and Social Services (DHSS) submits annually as part of the grant application to US EPA to request the DWSRF capitalization grant under the Safe Drinking Water Act (SDWA).

DHSS is eligible for \$11,004,000 in federal capitalization grant funds. DHSS will allocate \$7,592,760 in federal funds plus \$2,200,800 in state funds (20% required state match) for infrastructure improvement projects. \$3,411,240 will be used for Set-Aside activities.

Long Term Goals

- Maintain the Drinking Water State Revolving Funds (DWSRF) in perpetuity by judicious use and management of the assets by utilizing an adequate rate of return
- Target resources and funds to address the most significant public health and compliance problems facing the State's drinking water resources
- Assist public water systems with achieving affordable compliance and public health protection through DHSS personnel and Set-Aside contracts

Short Term Goals

- Revise the Operating Agreement with DNREC and the Department of Finance to transfer most duties to DPH from DNREC
- Provide funding to upgrade infrastructure for eight public water systems in Delaware
- Decrease public health risks in drinking water in 2019-2020 for 268263,808 Delaware residents
- Meet Program Activity Measure of **96%** of fund utilization rate, as negotiated with EPA by continuing to encourage expeditious spending with loan recipients and sub-grantees
- Continue to contract with Delaware Rural Water Association (DRWA), to provide technical assistance, training, along with strategies to small and mid-size municipalities to maintain and return to compliance with state and federal regulations
- Coordinate with CWSRF to develop streamlined emergency application procedures for both programs
- Review and update the current interest rate policy
- Continue to provide operator education through contracts with Delaware Technical and Community College
- Continue to offer sustainability assessments through a contract with Kash Group LLC
- Continue to hold quarterly meetings with Set-Aside recipients to monitor activity progress and evaluate expeditious spending
- Ensure borrowers are following cross-cutter requirements on construction projects
- Continue to track the Drinking Water to Clean Water Transfer with EPA assistance
- Utilize Set-Aside funds as outlined in the Work Plan
- Manage the Non-Fed Admin account judiciously

- Provide improved evaluation and assistance on DWSRF applications to ensure that applicants meet technical, managerial, and financial capabilities in accordance with the SDWA
- Continue to develop an Ag Strategy in accordance with input from partners and EPA
- Continue to implement two new technologies in the UIC program: EQuIS and ‘Tracer’. See UIC Section in this document and the Set-Aside Work Plan for more information.

PER Action Items

Action Items/PER results were not available at the time of writing this IUP. DHSS will make every effort to comply with Action Items identified for the 2018 Annual Review.

Project Selection and Loan Activities

In February 2019, Notice of Intent (NOIs) were ranked and placed in priority order, based on public health protection and SDWA compliance. All projects listed on the PPL are considered equivalency projects. Projects have not yet had financial reviews. Subsidies are based on historical data only and are subject to change. Full applications are due on June 1, 2019. Financial reviews can be performed at that time.

Listed below are projects that are ready to proceed as of May 15, 2019. The Comprehensive and Ready to Proceed Project Priority Lists (PPLs) are attached. *Note: small systems are defined as 10,000 in population or less.

DHSS will use all of the required 20% subsidy plus an unknown amount of additional subsidy. The exact amounts and projects for which those amounts will be applied will be known after **July 1, 2019** once the State budget is final. DHSS requested state funds to help supplement the Ellendale and Blades projects. The program will submit an amendment to the IUP shortly after July 1 to indicate exact subsidy amounts.

Update: Please see subsidy distribution as of July 30, 2019 below:

The DWSRF program must express a concern for fund perpetuity in trying to meet all of the subsidy requirements in the grant conditions. Future cash flow modeling will better substantiate this claim.

Subsidies listed below are estimates only, based on historical affordability indicators.

1. Tidewater Utilities—Holiday Pines (supplemental)

Total project cost: \$763,155
 Population: 195
 Description: supplemental loan for interconnection of a recalcitrant water system
 Source: ground water
 Subsidy: \$0
 Small system status: Yes
 Disadvantaged system status: No

2. Sussex County—Ellendale

Total project cost: \$5,765,000
 Population: 510
 Description: Installation of water distribution system to eliminate private wells

Source: ground water

Subsidy: \$0. 2020 Bond Bill funds (state funds) will be used to move forward with Phase 1 of the Ellendale project. Phase 2 will be on the 2020 DWSRF PPL and will be reflective of actual bid amounts; which are likely to exceed the requested project total.

Small system status: Yes

Disadvantaged system status: Yes, but this is now a state funded project.

3. Town of Blades—PFOA and PFOS removal

Total project cost: \$1,886,289

Population: 1,446

Description: installation of second carbon filter to remove PFOA and PFOS

Source: ground water

Subsidy: \$0 2019 Bond Bill funds (state funds) funded this project.

Small system status: Yes

Disadvantaged system status: Yes, but this is now a state funded project.

4. Town of Blades—water main extension to serve private wells with PFOA and PFOS contamination

Total project cost: \$1,438,218

Population: 150 new customers

Description: provide public water to those residents in Town limits that have PFOA or PFOS contamination in their private wells

Source: ground water

Subsidy: \$0 2020 Bond Bill funds (state funds) will be used for this project.

Small system status: Yes

Disadvantaged system status: Yes, but this is now a state funded project.

5. Lewes Board of Public Works—Donovan Smith interconnection

Total project cost: \$2,668,659

Population: 390

Description: Interconnection to public water, eliminating private wells

Source: ground water

Subsidy: \$1.0-1.5M in subsidies will be offered

Small system status: Yes

Disadvantaged system status: Yes

6. Lewes Board of Public Works—Abbott Park (supplemental)

Total project cost: \$407,925

Population: 60

Description: Interconnection to public water, eliminating private wells

Source: ground water

Subsidy: \$0

Small system status: Yes

Disadvantaged system status: Yes

7. City of Newark—Water main replacement Phase 2

Total project cost: \$1,000,000

Population: 30,897
Description: Water main replacement throughout the City
Source: ground water/surface water
Subsidy: \$0
Small system status: No
Disadvantaged system status: No
Disadvantaged system status: No

8. Town of Magnolia—Distribution System Upgrades –From 2018 PPL

Total project cost: \$1,400,000
Population: 235
Description: distribution upgrades throughout Town
Source: ground water/surface water
Subsidy: **\$1,000,000 in subsidies will be offered**
Small system status: Yes
Disadvantaged system status: Most likely, but will be confirmed after financial review is complete. EPA encourages use of subsidies to fund lead service line replacement projects * see page 11 of this document for more information.

9. Town of Georgetown—Distribution System Upgrades

Total project cost: \$1,255,000
Population: 5,160
Description: Distribution system upgrades in priority areas of the Town
Source: ground water/surface water
Subsidy: **\$1,000,000 in subsidies will be offered**
Small system status: Yes
Disadvantaged system status: Yes

10. Artesian Water Company 3 projects: Coventry development, Marhallton Heights, and Wilmington Manor Gardens

Total project cost: \$1,700,000, \$1,330,000, and \$1,035,000 respectively
Population: 225,000 for entire system
Description: distribution upgrades in 3 neighborhoods
Source: ground water/surface water
Subsidy: \$0
Small system status: No
Disadvantaged system status: No
Note: 3-way tie in ranking

Subsidy Requirements

DHSS will meet the minimum of 20% subsidy requirements by providing principal forgiveness to:

- Communities identified as Disadvantaged
- The next most ‘in need’ communities as identified by the financial review and affordability criteria mentioned herein

- Per communication with DNREC (who manages DHSS' loan portfolio) and EPA Region 3, the Town of Frankford, per legal action, will receive \$486,291 as a loan restructuring package. More information on the legalities and final agreements can be obtained upon request. The \$486,291 will be applied toward any subsidy requirements. Because the dollars are not for a construction project, but for a loan restructure, the funding was not required to be on the PPL (*repeat from 2018 IUP*).

State Match

The State Match will be made using state bond bill funds.

Bypass Procedures

Upon written notice, DHSS can bypass a project on the fundable portion of the PPL based on the following:

- Project is withdrawn by the applicant
- Project is not ready to proceed
- System is unwilling to address any Significant Non-Compliance (SNC) issues
- System is lacking technical, managerial, or financial capacity
- System is out of compliance and demonstrates unwillingness to correct A133 Audit or Davis Bacon, or Buy American Iron and Steel issues
- System is not current on loan repayments from prior closed loans
- An emergency project is approved

DHSS will provide applicant written notice if their project(s) will be bypassed. DHSS will reinstate bypassed projects if funds become available and the project meets all criteria above. Funds that become available due to project bypass will be offered to the next project on the PPL.

Emergency Project Requirements

EPA allows States to establish procedures to identify and prioritize Emergency Projects under consideration for DWSRF funding. Projects necessary to alleviate emergency situations that result in an imminent threat to public health can be immediately elevated to the top of the PPL upon recommendation by DHSS and the concurrence of the Cabinet of State Planning Issues. As of May 14, 2019, DHSS has not received any emergency project applications.

In addition, per EPA Region 3 communication, and upon further guidance, DHSS may coordinate with the CWSRF to develop streamlined emergency procedures during this grant period.

Loan Guidelines

DHSS proposes to use a total of \$7,663,830 of federal and state funds in addition to other sources to provide low interest loans to public water systems for infrastructure improvement projects.

*Please refer to the Sources and Uses Chart for more details

Interest Rate Policy:

Note: DWSRF and CWSRF expect to review and update the interest rate policy in summer 2019. Any revisions will be submitted to EPA as an addendum to this IUP.

The criteria and interest rates apply to new public, private/public use, investor-owned, and private/private use WPCRF and DWSRF loan applications. Applicants may be able to obtain a lower interest rate based on projected residential user rates as a percentage of Median Household Income (MHI) above 1.5 percent, and 2.0 percent for wastewater and drinking water user rates combined.

Criteria:

- * 30 Year Tax-Exempt Municipal Bond Benchmark (BVMB30Y) will be used to establish the interest rate for public and private/public use loans.
- * 30 Year Taxable Treasuries (GT30) will be used to establish the interest rate on investor-owned utility, and private/private use loans.
- * Interest rates shall be set at 85.0 percent of the BVMB30Y and GT30, respectively. The actual interest rate for projects shall be set 5 business days prior to when loan proposals are recommended for approval by the Water Infrastructure Advisory Council (WIAC).
- * Interest rates for the WPCRF Loan Conservation and Water Quality Improvement Sponsorship Loan Programs may not be set lower than 2.0 percent.
- * WPCRF Expanded Use Program loans (residential septic system replacements, and poultry and dairy best management practices) will have a fixed interest rate of 3.0 percent.
- * In the event that it is necessary to leverage the Funds, interest rates may be adjusted as needed to meet program and financial requirements.

Notes: Interest rates are publicly available at <https://www.bloomberg.com/markets/rates-bonds/government-bonds/>

- * BVMB30Y – Muni Benchmark 30 Year Tax-Exempt bonds with an average rating of AAA from Moody's and Standard & Poor's.
- * GT30 – US Generic Government 30 Year Taxable US Treasuries - bills/notes/bond indices 95 Percent of following 10 year Interest Rate Market Benchmarks may be used for potential projects financed over 20 years or less
- * BVMB10Y – Muni Benchmark 10 Year Tax-Exempt bonds with an average rating of AAA from Moody's and Standard & Poor's.
- * GT10 – US Generic Government 10 Year Taxable US Treasuries - bills/notes/bond indices

Proposed US Tax Reform, if it passes, may have an impact on the pricing of tax-exempt bonds and their relative value to taxable bonds. An adjustment to the index or multiplier may be necessary should the passage of tax reform render the proposed pricing formulas or indices obsolete.

Additional loan subsidies in the form of lower interest rates, principal loan forgiveness, and/or longer loan repayment terms up to 30 years may be provide if a proposed project will increase existing drinking water user rates above 1.0% of a community's Median Household Income (MHI), or 2.0% of MHI for combined drinking water and wastewater user rates.

Disadvantaged Community Program

A community considered for the DWSRF Disadvantaged Community Program may receive additional loan subsidies as outlined above.

Possible DWSRF Administrative Loan Fees

DWSRF Administrative Loan Fees have been waived for the 2019 PPL/applicants.

Other Project Information

Tie-breaking procedures

The project with the greatest number of points under the Quality Deficiencies will receive the higher ranking. If there is still tie, the system with the greater population will receive the higher ranking, or, if the tie occurs with the same borrower, the borrower will be consulted before any decisions are made.

Public Review

The Ready to Proceed PPL and IUP was presented to the Water Infrastructure Advisory Council, stakeholders, and members of the public on March 13, 2019. Documentation is enclosed. As of May 14, 2019, no public comment was received.

- The Public Workshop Review process developed and accepted by EPA as stated in the Operating Agreement establishes the process for soliciting funding applications, developing the project priority lists, and the public comment review process.
- Additionally, any amendments to the IUP will be posted to the DHSS/DWSRF website for public review and comment. Significant PPL or financial amendments will be presented to the Water Infrastructure Advisory Council for review, public comment, and approval.
- Changes will be noted in the Annual Report.
- See Appendix for details.

Leveraging

DHSS does not anticipate the need to reserve the right to transfer Capitalization Grant and loan repayments monies between the State's Water Pollution Control Revolving Fund (WPCRF) and Safe Drinking Water Revolving Loan Fund programs as necessary to ensure the full utilization of the federal assistance during this grant year.

Cross Collateralization between SRF programs—Transfer Use

As of May 14, 2019, there is \$31,161,802 available for drinking water project loans and current loan disbursement. This 'transfer back' to the DWSRF may begin in calendar year 2020. DHSS will coordinate with DNREC to receive regular account summaries. Those summaries will be reported in the next corresponding Annual Report. *Please refer to the Sources and Uses*

attachment for details.

Cross Collateralization between SRF programs

The DWSRF program transferred \$27,050,178 in Federal funds and \$5,410,035 in State funds to the CWSRF program. Of this, \$1,298,408 was used for administrative costs (4% from both Federal and State). This leaves \$31,161,802 available for project loans.

It is the understanding between both DNREC and DHSS that these funds will be made available back to DHSS for payments on existing loans and to make additional loans when needed by the DWSRF program on a cash flow basis.

Funds for both new and existing DWSRF loans will be used in the following order: first from the Federal capitalization grants, second from the DWSRF repayment & interest fund, then when these funds are exhausted, from the previously transferred funds to the CWSRF program.

An accounting of these funds will be included in the Sources and Uses table for both the IUP and Annual Report for both SRF programs.

To date, no funds have been transferred back to the DWSRF program.

DWSRF Coordination of funding priorities with State Drinking Water Enforcement Agency

The DWSRF program coordinates with the Office of Drinking Water by performing a Capacity Development review. In addition, offices collaborate throughout the year to offer technical assistance through DRWA systems that are on Public Notice.

Davis Bacon Compliance

DHSS agrees to comply with Davis Bacon requirements as outlined in guidance distributed by EPA. Additionally, DHSS performs site inspections during construction.

Green Project Reserve

DHSS is not participating in Green Project Reserve for 2018, as it is not in federal grant requirements.

Sustainability Policy Description

Fix It First

DHSS does not fund projects that are primarily for growth. Applicants are encouraged to study existing infrastructure to determine most critical needs, and then base their DWSRF applications on those needs.

Capacity Development for Loan Applicants

The DWSRF program requires the Capacity Development Program, housed in the Office of Drinking Water, review the Capacity Development portion of each full application, work with

systems to increase technical, managerial, and financial capacity; and report any serious, outstanding problems to the DWSRF program so that they may be addressed before loan closing.

Asset Management

DHSS has been proactive in encouraging applicants to implement the Asset Management Grant program. To date 15 systems have started an Asset Management Plan. The Non-Fed Admin Account has funded those grants. The maximum grant amount is \$100,000.

Program Management

DHSS designates all loans to requirements of Single Audits, DBE, Crosscutters, Davis Bacon, FFATA, and Buy American Iron and Steel

DBE Participation

Loans using the capitalization grant and state match funds will conform to Disadvantaged Business Enterprise (DBE) steps as outlined by EPA. Borrowers must document and demonstrate good faith efforts consistent with federal regulations.

Davis Bacon Act Participation

All DWSRF-assisted projects capitalization grant and state match funds will conform to Davis Bacon wage determinations, wages, and activities as outlined by EPA. Borrowers must document and demonstrate efforts consistent with federal regulations. Davis Bacon Act Participation.

Efficient Expenditure

- Loans- the DWSRF program will use a “First in-First Out” approach when making loan payments
- Set-Asides- the DWSRF program will prepare one year set-aside budgets. During the second year of the grant, the program will review expenditures and re-budget set-aside funds for additional set-aside work or project loans per EPA approval. All funds will be expended by the end of the final year of the grant.

Policy to Assure Competency of Organizations Generating Environmental Measurement Data (pertaining to the 10% Set-Aside budget item of \$95,000 for laboratory analysis)

- Use of the \$95,000 for laboratory analysis is of similar nature of the scope of work for the use or generation of environmental data in previous grant awards.
- DHSS has a Quality Management Plan that is currently under review by PWSS; as the Policy expired in March 2019.

Reporting

DHSS will make all efforts to report all applicable information to: FFATA, Projects Benefits, Report, and NIMs in accordance with applicable due dates set forth by EPA.

Set-Aside Activities

The SDWA allows states to use part of the Capitalization grant to support Set-Aside activities. DHSS proposes to use \$3,411,240 from the grant to fund the following Set-Asides.

*Please refer to the Set-Aside Work Plan for more details and allotments.

Small Systems Technical Assistance (2%)

Provide assistance to small systems through contractor personnel. Funds provide technical assistance to public water systems serving less than 10,000 people. Contracts with DRWA and DTCC continue to provide technical assistance and training.

DRWA contracts:

- Provide 80 on-site technical assistance visits to community water systems and municipal water systems; visits can include technical, financial, and managerial assistance along with promotion of the DWSRF program and 1:1 application/loan process help
- Coordinate with ODW, OE, and DWSRF to identify systems in need of priority technical assistance. Such as: community, non-transient non-community (NTNC), transient, and/or seasonal systems in need of assistance due to non-compliance or potential non-compliance
- Provide assistance to systems required to perform Public Notice, critical Sanitary Survey violations, systems with contamination exceedances and Emergency Response Planning
- Provide assistance and training for contamination prevention, compliance education, water operator training, and preventive maintenance
- Provide three municipalities and their community water systems training or on-site assistance for contamination prevention from backsiphonage, backflow, and cross-connection control
- Provide two formal training classes on onsite hazards and cross connection
- Deploy, upon request, the mobile on-site training unit to demonstrate specific compliance needs to SRF systems

DTCC contracts:

- Certify and provide continuing education for approximately 155 Operators-In-Training and licensed water operators of small public water supply systems (non-profit)
- Provide tuition assistance for Base Level Water Operators Course to approximately 30 new operators
- Provide 11 Base Level Water Operators with a basic math course
- Recruit students through advertisement in the local press to enter the Drinking Water Training program
- Provide tuition assistance for up to two students per semester to cover the cost of selected courses for over a one-year period. Unemployed, underemployed, and new hires for any system will be eligible for this program
- Administrative Support and Oversight - Administrative salary funding will be utilized for the following: to plan operations; recruit and interview prospective students; counsel students regarding course schedules; work with industry leaders to offer courses that meet the needs of operators; identify new courses needed; assist with tutoring needs; development of job building skills; assist with employment opportunities; and market program and courses to industry via varying methods. In addition, staff will assist with registering students, and will report and track the funding for students enrolled in this program.

Ag Strategy

Please refer to the 15% Set-Aside for information on the Cover Crop Program to learn how DHSS DWSRF Administration is meeting EPA's Ag Strategy recommendations.

State Program Management (10%)

The PWSS, Operator Certification, and UIC programs will be funded through this Set-Aside as follows:

Operator Certification

Operator Certification expenses are absorbed by funding positions with the PWSS grant, with the exception of \$3,000 to proctor two sets of Operator Base Level tests. Should Operator Certification expenses become burdensome on the PWSS grant, DHSS has the ability to use the DWSRF grant as a source of funding. Proposed activities include:

- Monitor, track, and report water operator licensures
- Communicate with operators about licensing, endorsements, and renewals
- Coordinate with DTCC to provide provisions and proctoring for Drinking Water Operator examinations
- Enhance communication actions such as participating in state-wide conferences and alerting operators about educational opportunities through the ODW newsletter
- Ensure public water systems that are required to have an operator do so, either by directly employing an operator or by contracting with an operator
- Maintain operator database

Public Water Supply Supervision (PWSS)

- Monitor, track, and report compliance for approximately 500 Public Water Systems
- Work with EPA on the transition to SDWIS Prime and CMDP
- Continue to utilize the EPA reporting under Enforcement Response Policy and ETT
- Work with Bureau of Public Health Informatics to post all relevant information and sample results per EPA guidance and Delaware law

Delaware Public Health Laboratory

- Observe EPA method 525.2 for semi-volatile compounds
- Develop a GC/MS system plan
- Expand pesticide testing and achieve certification
- Maintain updated technologies as required by EPA
- Continue Certification officer program
- Meet all certification testing standards defined by EPA

Underground Injection Control

- Develop policies and draft comprehensive regulations addressing the disposal of back-wash residuals generated during the water treatment process
- Collect data, work with water treatment system suppliers, water utilities, and the Division of Public Health to determine the scope of the issue
- Identify potential impacts to ground water resources, identify appropriate disposal options for the back-wash residuals
- Identify and manage potential impacts on groundwater quality from the operations of major

wastewater treatment and disposal facilities to address public concerns

- Contact brine generators that process between 2,500 and 25,000 gallons of water daily and require them to either apply for UIC permit, or to install best available technology water treatment systems such as a Demand Initiated Regeneration water treatment system
- Continue to perform inspections of Class V wells in Delaware
- Continue the pilot “tracer” project
- Implement EQuIS
- Develop real-time/contemporary web-based groundwater monitoring

Local Assistance and Other State Programs (15%)

The Capacity Development and Source Water Protection Programs will be funded through this Set-Aside as follows:

Capacity Development

- Track and identify trends in TMF capacity for all Delaware public water systems triennially
- Conduct audit of Lead and Copper Rule sampling plan compliance for all Community Water Systems and NTNC Water Systems, and provide technical assistance as applicable
- Increase educational efforts to prospective new systems so that initial operations are not impeded by non-compliance
- Improve compliance with the SDWA by helping existing public water system stakeholders obtain a better understanding of the regulations
- Revise and update the Capacity Development portion of the DWSRF loan application to increase effectiveness of DWSRF loan application Capacity Development reviews
- Refer existing public water systems with a score of 11 or higher on the ETT list to external assistance providers

DRWA and DTCC Contracts through Capacity Development

- Provide two small municipalities (population under 500), five non-municipal communities, and at least three seasonal water systems with 1:1 GIS technical assistance
- Conduct 2 local officials training classes
- Conduct four specialized ARC Flash NFPA 70E training classes and two Occupational Safety and Health Administration (OSHA) Confined Space Entry Level training classes for operators and/or other safety training based on need
- Online Course Development DTCC will revise the limited License Online Course; all previous examinations will also be revised to reflect any changes and/or needs once becoming active
- Develop and offer three specialty workshops to licensed operators, state regulators, municipality leaders, and interested water quality professionals
- Online Surface Water Certification Exams – DTCC shall make the Surface Water Certification Examinations available in an online format. The pilot will be tested by ODW staff and the advisory board
- Develop an outreach program to 3-5 local high schools to highlight and create awareness in water treatment careers

- Assess and Purchase New Automated Training Devices – DTCC shall research, assess, and purchase training equipment, textbooks, curriculum, and/or software pertaining to water quality control and processes to enhance classroom instruction and improve field skills

Sustainability 1:1 Assistance and Cyber Security Programs

The DWSRF Program will continue to work with Kash Srinivasan Group, LLC to provide 1:1 assistance to small and medium municipal public water systems to engage in long range planning activities for their utilities. At least five municipalities will develop custom implementation of Financial Analysis tools developed by the University of North Carolina.

Source Water Protection

- Provide assessments for any new system, revising and updating existing source water assessments (e.g. delineation, contaminant sources, susceptibility assessment), providing technical assistance to solve source water problems including recommendations for potential DWSRF funded monitoring network/systems development, and resource characterization activities
- Support of local efforts to develop SWP ordinances and comprehensive plans or other local approaches, support to SWP-related UIC activities, and related needs
- Work with federal, state agencies, private organizations, and local governments with regards to source identification, characterization, and prevention
- Provide technical assistance, committee representation, information dissemination; review of local development plans and comprehensive land use plans as part of the Preliminary Land Use Service (PLUS) process
- Manage information including: data collection, data storage, and recovery; GIS development, web availability, state and federal data reporting capacity

Ag Strategy Program

Year Two of the Ag Strategy Program expands on Year One work, including outreach to farmers who may not be in the Cover Crop program, exploration of expanded eligibilities, i.e., buffer zones, and pollinator plots. The program may also explore further incentives for farms that are close to municipal source water protection areas.

DHSS will continue work with DRWA and Sussex County Conservation District to improve upon and add GIS mapping layers.

Additionally, DHSS will explore opportunities to use existing monitoring well real-time data collection with DNREC partners which could provide beneficial data to public wells, i.e., contaminant alerts and flow in ground water.