NMP REVIEW TIMEFRAME EXTENSIONS

March 2022 Virtual NM roundtables

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HISTORY / PROCEDURE

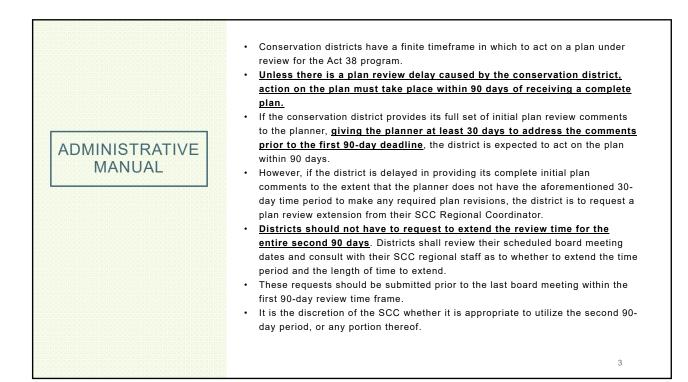
REGULATIONS

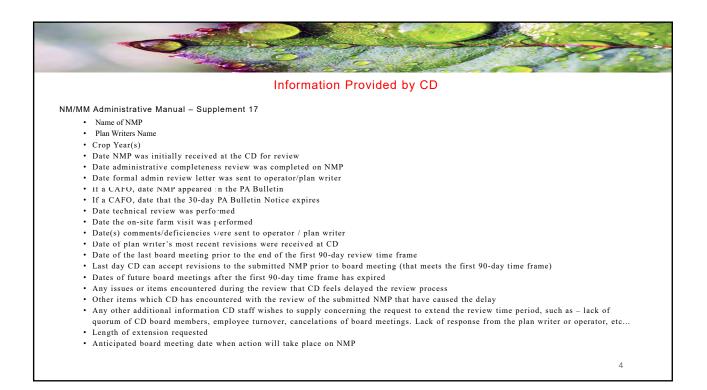
As noted in the regulations, an action on Act 38 NMPs needs to occur within the first 90-day review timeframe. The regulations do allow for an additional 90 days' review. However, only Conservation Districts or the Commission (not planners) can roll a plan review over into a second 90day review timeframe.

PROCEDURE

If NMPs are not in approvable form in the first 90-day review time frame, the Conservation Districts are to contact their SCC regional coordinator for consultation on extending the plan review timeline from the first 90 days to the second 90 days. (See NM/MM Administrative Manual Chapter 3)

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	Supplement 17	Supplement 17
	COMMONWEALTH OF PENNSVLVANIA NUTRIENT MANAGEAGENT PROGRAM	 Last day CD can accept revisions to the submitted NMP prior to board meeting (that meets the first 90-day time frame):
	PLAN REVIEW TIMEFRAME EXTENSION REQUEST	15. Dates of future board meetings after the first 90-day time frame has expired:
	As noted in the regulations, an action on Act 38 NMPs needs to occur within the first 90-day review timeframe. The regulations do allow for an additional 90 days' review. However, only Conservation Ditricts or the commission (not planners) can roll a plan review over into a second 90-day review timeframe.	16. Any issues or items encountered during the review that CD feels delayed the review process:
	If NMPs are not in approvable form in the first 90-day review time frame, the Conservation Districts are to contact their SCC regional coordinator for consultation on extending the plan review timeline from the first 90 days to the second 90 days. (See NM-MM Administrative Manual Chapter 3)	17. Other items which CD has encountered with the review of the submitted NMP that have caused the delay:
	When respects for review extensions are sent to the SCC Regional Coordinator, the following information shall be provided: 1. Name of NMP:	18. Any other additional information CD staff wiches to supply concerning the request to exclude the review time period, such as lack of quectum of CD board members, employee, and the another of the state of the state of response from the plan writer or operator, eds
	Crop Year(s): Date NMP was initially received at the CD for review: Date Administrative completeness review was completed on NMP:	19. Length of extension requested: 20. Anticipated board meeting date when action will take place on NMP:
	Date formal admin review letter was sent to operator/plan writer:	Person Requesting Extension:
	If a CAFO, date NMP appeared in the PA Bulletin: If a CAFO, date NMP appeared in the PA Bulletin:	County:
	8. If a CAFO, date that the 30-day PA Bulletin Notice expires: 9. Date technical review was performed:	Date:
SUPPLEMENT	10. Date the on-site farm visit was performed:	FOR OFFICIAL USE ONLY
17	11. Date(s) comments/deficiencies were sent to operator / plan writer:	Plan Review Time Extension:APPROVEDDISAPPROVED
	12. Date of plan writer's most recent revisions were received at CD:	Length of time NMP was under review:
	13. Date of the last board meeting prior to the end of the first 90-day review time frame:	Number of days extended past criginal 90 days: Proposed meeting date for NM plan approval:
		180 day NMP approval deadline:
		SCC Regional Coordinators signature:DATE:DATE:
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REASONS FOR EXTENSIONS

- COVID 19 ISSUES
- PA BULLETIN NOTICES AND TIMING
- REVIEWER USING PLAN REVIEW TOWARDS NM CERT
- PLAN SUBMISSION DATE VERSUS CD MONTHLY BOD MEETING DATES
- SOIL AND MANURE TESTS WERE DELAYED.
- PLANNER FORGOT TO SEND BACK CORRECTIONS.
- PLANNER WAS LATE IN SENDING FINAL FORM PLAN AFTER CORRECTIONS WERE MADE.
- SWINE DISEASE OUTBREAK SO OPERATOR DID NOT WANT CD DOING SITE VISIT

REASONS FOR EXTENSIONS

- LACK OF RESPONSE FROM OPERATOR / HARD TO COMMUNICATE WITH / OR SCHEDULE VISITS
 WITH LIMITED AVAILABILITY MADE IT DIFFICULT TO SCHEDULE SITE VISIT
- SCC ACTION MEETINGS OCCUR ONLY EVERY OTHER MONTH
- BOARD MEETING CANCELLED
- PLANNER DID NOT ADDRESS ALL CONCERNS / PLANNER RESUBMITTED INCOMPLETE NMP/ SLOW
 RESPONSE FROM PLAN TO SUBMIT REVISIONS
- ADDITIONAL NBSS WERE NEEDED
- AG E&S PLAN WAS NOT AVAILABLE OR NEEDED UPDATED/AMENDED
- CD RECEIVED A HIGH # OF NMPS AND DECIDED TO PUSH VAO TO THE BOTTOM OF THEIR LIST SO THAT ALL CAOS COULD BE APPROVED PRIOR TO THE START OF THE CROP YEAR





REASONS FOR EXTENSIONS

- DID NOT GET THE FIRST SET OF TECHNICAL REVIEW COMMENTS TO THE PLAN WRITER WITHIN 30
 DAYS OF PLAN SUBMISSION
- BMPS NEEDED TO BE CERTIFIED BY A P.E.
- SIX (6) NON-FINAL FORMS OF THE NMP SUBMITTED BY THE PLAN WRITER AND STILL NOT IN FINAL FORM



SUMMARY	 Plan review extension requests are to be initiated by plan reviewers, not plan writers.
	 The SCC is fully aware of CAFO bulletin notice delays, its
State State State	just the nature of that beast.
	 The SCC is also fully aware that timing of CD Boards
	meetings and the NM certification process causes timing issues.
	 Operators need to be more involved and take the program seriously. It's the LAW.
	 There is no reason that soil / manure test results, ag E&S
	plans, and P.E. Certification of BMPs should delay approval
ALC ANY	of NMP. These items should be completed before submitting the NMP
	 In general, NMP writers and reviewers are doing an
	OUTSTANDING job is getting NMPs approved within the 1 st 90 days.

