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Subject: **Review of TMDLs for comparison to watershed plan requirements**
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Tetra Tech reviewed the TMDLs and associated implementation plans for the following waterbodies in Region 10 to evaluate whether the documents have sufficient information to meet criteria for Section 319 watershed plans:

Idaho
- Pack River
- Bissel Creek
- South Fork Clearwater River
- Blackfoot River
- Mid-Snake River/Succor Creek

Oregon
- Ten Mile Lakes
- Bear Creek, Oregon
- Sandy River
- Alvord Lake
- Applegate Subbasin

Washington
- Lower Skagit River
- Nisqually Watershed
- Cottage Lake
- Wilson Creek
- Upper White River

We completed individual worksheets for each waterbody using *Worksheet 12-3: Basic Components of a Watershed Plan* from EPA's *Handbook for Developing Watershed Plans to Restore and Protect our Waters*. Completed worksheets are attached to this memo to summarize the available information in the TMDL documents relevant to watershed plan requirements.

One of the overall questions to resolve for the TMDLs regarding their use as a watershed plan would be the consideration of all listed impairments and other watershed problems. A watershed plan should consider all of the impairments and problems in the watershed. Many of the plans address multiple pollutants while some are specific to one pollutant. It is unclear whether the TMDLs and plans address all listed impairments. In addition, a watershed plan provides the opportunity to address issues that are not subject to 303(d) listing. If the TMDLs were "turned into" watershed plans, it would be good to make sure they cover, or at least document, all of the known problems in the watershed.

The following are state-specific summaries of the types of information typically included in their respective TMDL documents:

Idaho

Most of the information required for a watershed plan could be found in the TMDL Implementation Plans reviewed for Idaho. Idaho completes their TMDLs and implementation plans by subbasin and therefore address all of the impaired waterbodies and related pollutants in a watershed. Because implementation plans in Idaho are written by the designated management agencies, several of the Implementation Plans are a compilation of several separate documents. For example, one Implementation Plan might consist of three source-specific plans: one for agriculture written by the Soil Conservation Commission, one for forestry written by the Department of Lands, and one for roads written by the Idaho Transportation Department. This also results in the documents being inconsistent in format. Most of the components of a Watershed Plan could be found in the documents except for interim targets and criteria for whether or not progress was being made toward the water quality standards. However, a schedule for review of the TMDL and the TMDL targets were usually included. In addition, the plans typically did not have details on an education component.

Oregon

Oregon's *TMDL Implementation Plan Guidance* indicates that the Water Quality Management Plan (WQMPs) section of a TMDL identifies the Designated Management Agencies that are required to develop and implement plans for implementation of the TMDL related to their sector or source. The Oregon Administrative Rule (OAR 340-042-0080(3)) outlines the required components of a sector- or source-specific implementation plan, as follows:

> *(A) Identify the management strategies the DMA or other responsible person will use to achieve load allocations and reduce pollutant loading;*
> *(B) Provide a timeline for implementing management strategies and a schedule for completing measurable milestones;*
> *(C) Provide for performance monitoring with a plan for periodic review and revision of the implementation plan;*
> *(D) To the extent required by ORS 197.180 and OAR chapter 340, division 18, provide evidence of compliance with applicable statewide land use requirements; and*
> *(E) Provide any other analyses or information specified in the WQMP.*

All of the TMDLs reviewed had associated WQMPs which provide the basis for more detailed Implementation Plans. However, they did not include the Implementation Plans developed by the DMAs. Most WQMPs reviewed were developed for multiple pollutants and multiple waterbodies by basin. Many of the WQMPs were very cumbersome and difficult to navigate. Much of the information for Worksheet 12-3 was not found in the WQMPs and had to be found in the TMDL reports. Most of the WQMPs (or the TMDLs) did not include an education component, interim targets/milestones, or costs associated with the management actions. However, this information might be included in the DMAs' Implementation Plans.

Washington

After completing a TMDL Washington Ecology develops Water Quality Implementation Plans (also called Detailed Implementation Plans) with input from stakeholders as a framework for corrective actions to implement the TMDL. The Implementation Plans reviewed for Washington were developed specific to one or two pollutants. Similar to the other states, there was usually no information on an education component, interim targets, or costs associated with management activities. All of Washington's Implementation Plans were written by Ecology, not various DMAs as in Idaho and Oregon. In general Washington's Implementation Plans all followed the same format. However, the Plans also did not consistently have the same type of information. Sometimes all information needed to fill out Worksheet 12-3 was in the Implementation Plan, but other times it had to be found in the TMDL Report.