To: Turvey, Martha[Turvey.Martha@epa.gov]
Cc: YON Donald R[YON.Donald@deq.state.or.us]
From: Carlin, Jayne
Sent: Wed 9/3/2014 2:02:01 AM
Subject: Comments on Final Draft 2014 Oregon NPS Mgt Program Plan
Final Draft 2014 Oregon NPS Management Program Plan JC Cmts.docx

Hi Martha,

Attached are my detailed comments on the Final Draft 2014 Oregon NPS Mgt Program Plan. The plan is comprehensive. Overall comments are shown below.

1. Oregon needs to explain why the current Plan is being revised. May want to include the need to update the Plan every 5 years and submit for EPA's approval, discuss any major changes from the original plan and how the plan will be updated in the future.

2. Consider where to include the public participation process in the Plan's development—whether to include in the Plan itself or as part of the submittal to EPA.

3. Consider incorporating the 303d new vision and goals into this plan including additional information to be incorporated into the Integrated Reports by 2016.

4. Need to provide more detail on the process and criteria used to prioritize waters for protection and restoration.

5. Need to include new information required to be in the TMDL documents ("…as a condition of using § 319 funds to develop TMDLs, the state will include the following supplemental information to support the load allocations specified in the TMDL: (1) an identification of total NPS existing loads and total NPS load reductions necessary to meet water quality standards, by source type; (2) a detailed identification of the causes and sources of NPS pollution by source type to be addressed in order to achieve the load reductions specified in the TMDL (e.g., acres of various row crops, number and size of animal feedlots, acres and density of residential areas); and (3) an analysis of the NPS management measures by source type expected to be implemented to achieve the necessary load reductions, with the recognition that adaptive management may be necessary during implementation.).

6. Explicitly describe how DEQ and other state agencies partner with Tribes to address tribal concerns pertaining to NPS.

7. May want to include a list of acronyms in an appendix or at the beginning of the report.

Sorry so late with my comments.

Jayne

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http://www.epa.gov/r10earth/tmdl.htm