

## Schary, Claire

---

**From:** Schary, Claire  
**Sent:** Friday, May 31, 2013 12:36 PM  
**To:** Bobby Cochran; Carrie Sanneman  
**Cc:** Mann, Laurie; Stewart, William C.; Psyk, Christine  
**Attachments:** Discussion Guide\_OverallTradingProgReqs\_2013 05 23 - Schary comments.docx

Bobby & Carrie,

At Bobby's suggestion, I am providing you written comments and suggested wording changes for the discussion guide on overall trading requirements. While I haven't read the other documents you sent out ahead of time as carefully, I didn't see anything on those that concerned me (but I'll read through them again and forward my comments and suggested wording changes if I do find something).

I hope you're not overly alarmed at the length of my comments, but I wanted you to see what my concerns are for how some of this is worded. I will raise the major points during the workgroup, but since this document will be posted on your website after the workshop, I'm hoping you can look at these now and make some of the changes you agree with. I think you may also want to think about restructuring some of the discussion around Load Allocations and credit baselines, since I was getting very confused in how it was laid out into its sub-topics. Finally, please add more sentences about the purpose of this whole discussion is to identify important but hopefully relatively easy ways for TMDLs to better support trading, rather than for trading to change the way we do TMDLs. My fear is that some of the sentences could be misinterpreted or misconstrued, and be used to support some outside groups' concern about this project being something that it's not intended to be.

FYI, I'm also encouraging Laurie, Bill and Christine to also look over this document, and the other documents too, to see if there's any wording they want to see changed before it's posted on the website, to make sure it's accurate about how trading should fit in with TMDLs and to alert you to what's likely to be misinterpreted.

I'm leaving at 2 pm today (Friday) but am around Mon. & Tues. if you want to talk about my comments before the meeting on Weds. (but you don't have to).

Have a good weekend!

- Claire

Claire Schary  
Water Quality Trading Coordinator  
Watershed Unit / Office of Water & Watersheds  
[schary.claire@epa.gov](mailto:schary.claire@epa.gov) / (206) 553-8514  
USEPA Region 10 / 1200 Sixth Ave, Suite 900 (OWW-135), Seattle, WA 98101