

Schary, Claire

From: Carrie Sanneman [sanneman@willamettepartnership.org]
Sent: Wednesday, May 22, 2013 6:15 PM
To: Keenan, Dru
Cc: Schary, Claire; Poulosom, Susan
Subject: Re: Draft Best Practices, Follow-up from Workshop #1, Review by 5/22

Hi Dru,

Thank you for sending these, I appreciate your time reviewing the document. I'll be working through all the comments between now and the next workshop and will follow up when I run into questions.

Best
Carrie

On Wed, May 22, 2013 at 5:10 PM, Keenan, Dru <keenan.dru@epa.gov> wrote:

Hi Carrie,

I've reviewed Claire's comments on the Best Practices Document and I would like to add to her response with a few comments pertaining to permitting.

With regard to [1.2 Eligible credit buyers](#) and Compliance.

1) I think what should be covered here/emphasized is the facility's compliance history. We have experience with a number of facilities that have miserable compliance histories and they are the ones that should not be allowed to trade. On the other hand, if the compliance issue is specific with not being able to meet the specific permit limit that is the subject of a trade and they have a very good track record but for their temperature limit or nutrient limit – then that should not disqualify them for a trade. Therefore, the facility needs to be one that has everything else under control - -other limits, monitoring, reporting, being current with reapplying for permits before they can be eligible for consideration of WQT. Another eligibility requirement should be the facility's level of sophistication - - we know of numerous facilities that just aren't capable of doing complicated work (too small to support, poor, etc) should not be eligible to trade because I doubt they wouldn't be able to manage the complexities.

2) WQT can't be used to meet technology based limits.

3) Additional ideas for eligibility criteria: permit may not be expired (a little inside baseball issue, but I can explain what this means if necessary); if the facility is struggling to meet ELGs/TBELs, then it shouldn't be eligible for trading

[With regard to 1.3 Trading Area:](#)

In addition to the discussion on boundaries, it must be clear, that the trade must be in waters with the same designated/beneficial use. For example if the pollutant is temperature for rearing salmonids - -the trade must benefit rearing salmonids in the same watershed. Temperature is probably the most sensitive to this requirement but down the road other pollutants – use designation combinations may arise. The only reason why we have specific temperature criteria is to protect the specific use of various salmonid life stages.

With regard to BMPs - - for temperature – nps practices, may need to look beyond the ag agencies for bmps. There may be a need to bring habitat restoration expertise to help identify what needs to be restored.

Please let me know if I need to provide more clarification around my comments - -I'm happy to explain.

-Dru

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From: Schary, Claire
Sent: Monday, May 13, 2013 7:32 AM
To: Bott, Dustan; Keenan, Dru; Park, Chae; Poulsom, Susan; Psyk, Christine; Rose, Bob; Stewart, William C.
Subject: FW: Draft Best Practices, Follow-up from Workshop #1, Review by 5/22

Team,

Here are revised versions of the notes and documents coming out of our first workshop. Please look them over and provide comments directly to Carrie (and copy me). Thanks!

-- Claire

Claire Schary

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From: Carrie Sanneman [<mailto:sanneman@willamettepartnership.org>]
Sent: Friday, May 10, 2013 8:23 AM
To: hbre461@ECY.WA.GOV; mgil461@ECY.WA.GOV; marti.bridges@deq.idaho.gov;
Michael.Mcintyre@deq.idaho.gov; Ranei Nomura; Schary, Claire; FOSTER Eugene P
Cc: Bobby Cochran; Joe Furia; Karin Power; Neil Mullane; Tim Wigington; Todd Gartner; David Primozych
Subject: Draft Best Practices, Follow-up from Workshop #1, Review by 5/22

Good morning!

Attached are documents representing the follow-up from Workshop #1. Please review and send us your feedback by **Wednesday, 5/22**. All documents are posted on the project website.

Here's what we have:

- **Final Meeting Summary** - incorporating feedback from the version distributed on 4/19
- **Revised draft of the JRA 2-pager** with tracked changes
- **Revised draft of the Guiding Principles** with tracked changes
- **Draft Best Practices from Workshop #1** - these represent our best attempt to synthesize points of consensus we heard on the Workshop #1 topics during and since the workshop. The intention is that we continue to revise this document until all are satisfied and we can consider upgrading them to Pilot Best Practices come November.

As usual, I have included only the core project team on this email so that you may distribute within your agency as most appropriate. Please follow up with questions, and enjoy your weekend.

Finally - for those participating in the BMP call next week - please look for an agenda and brief materials from me by this afternoon.

Best,

Carrie