

NPS Reduction Plan, Comment Summary December 2011				Comment	Response (Equivalent Level of Effort)				Notes
Chapter	Section	Page	Commenter		Comment Noted No Action	Add a Sentence	Add a Paragraph	Add a Page +	
All	--	--	HDR	Each page should have included draft	X				Comment noted
TOC	All	i	HDR	Chapters in Table of Contents should include the chapter name			X		Text added to referenced section.
3	Tables	--	HDR	Replace ~ to < throughout the report		X			Text modified within relevant section(s).
Using	--	--	HDR	Replace USR, ID and USR, WA with Upper Spokane River ID and Upper Spokane River WA			X		Text modified within relevant section(s).
14	All	--	HDR	Replace Upper Spokane River, ID with Upper Spokane River ID			X		Text modified within relevant section(s).
21	All	--	HDR	Add a conclusion chapter?	X				Comment noted
All	--	--	HDR	Inconsistent referring of other chapters/sections, sometimes with name and sometimes without, use mixture of bold, italics, and regular fonts				X	Text modified within relevant section(s).
			Workshop#1	Add text to end of fertilizer application actions with some indication that farmers using economics, not overly applying, action may already be highly implemented			X		Section 9.5.4 added SRW-SA-3
			Workshop#1	Explain buffer BMPs distances	X				Comment noted
			Workshop#1	Add text to AG actions differentiating AG in subbasins, such as Hangman vs. USI			X		Sections 13.5.3 and 14.5.3
			Workshop#1	Consider text explaining that Plan does not address fate and transport, or timing of delivery, Plan focuses on opportunities for reducing pollution throughout the watershed			X		Added text to Section 1.3
			Workshop#1	Check Idaho groundwater rules for fertilizer application rates, only at agronomic rates?	X				Comment noted
9	---	---	Workshop#1	Add an action to conduct/perform studies relative to fate and transport, specifically related to groundwater, potential to use USGS model, data				X	Created SRW-RM-5 in Chapter 9.
			Workshop#1	Add an action about hobby farms, similar to as in LSR			X		Similar to Little Spokane, added new HLC RM-1, LWS-RM-1, USI-RM-1

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			Workshop#1	Consider text explaining economics, we don't evaluate it economically, but costs driving implements, such as practices by farmers, cities and development, etc.			X		Section X.4.1 for 10 through 19
			Workshop#1	Consider adding something about atmospheric deposition		X			Section 20.3.1.2 text added
Subs	---	---	Workshop#1	Revise/check language explaining 25-percent "target", don't use target, explain in more detail, check lake TMDLs if cite any percent reductions to cite, explain assumptions and methology			X		Section X.3.4 for 10 through 19 revised
			Workshop#1	No-till - farmers change practices		X			Section 13.5.3 and Section 9.5.2
			Workshop#1	Manure management address	X				Comment noted
			Workshop#1	Could talk with producers/farmers	X				Comment noted
			Workshop#1	USI-UR-1 heading format issue to correct		X			Text modified within relevant section(s).
			Workshop#1	Add text about "approved" stormwater BMPs over the SVRP aquifer, double check Idaho Cities&Counties reference			X		Did not locate reference to approved BMPs in reference
			Workshop#1	BMP cost/pound question, think we have revised, double check		X			Footnotes in Table 2-1 edited.
			Workshop#1	Add text to Chapter 9 education/news/public information about developing and using consistent messages across the watershed and coordination, public education add subactions			X		Section 9.5.3, SRW-RM-1 - added paragraph.
			Workshop#1	Add text to USI-UR-5 about issues relative to sewer hookups such as need to also be annexed or possible to have MOUs or means to allow hookups		X			Addressed in Line 36. changes to Chapters 12, 13, 14
			Workshop#1	Explain/define what is meant by density related to the septics analysis			X		Sentence added to Section 4.4.4
14	14.5.6	14-17	Workshop#1	USI-UR-7 revise bullets, check 1st bullet about flow to/from aquifer, check if applies other subbasins			X		USI-UR-7 edited

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			Workshop#1	USI-UR-8 "Rathdrum, Garwood, Athol," if not a specific order put in alphabetical order. Check all lists.			X		Text modified within relevant section(s).
			Workshop#1	Stormwater BMPs needs to be maintained, where/how discuss O&M, in Chap 20 or elsewhere?			X		Added action to Chapter 9 - SRW-SA-3.
			Workshop#1	USI-UR-9 add to list, antifreeze, stuff used to winterized engines, cleaning solutions (such as washouts to not transfer invasive species - some solution TP free) pump out stations, apply to marinas and docks, lots of individual docks, address fueling practices			X		Text added to USI-UR-9
			Workshop#1	Add text review/revise county policies regarding density and proximity of septic to waterways and lakes		X			Text added to STE language in Chaps 10-15, 18, 19.
			Workshop#1	Education in Chapter 9 add text about who to target, target kids, schools, etc.		X			Section 9.5.3, SRW-RM-1 - added paragraph.
14	14.5.9		Workshop#1	EP add sewer management plans (Dick Martindale)		X			Text added to EP language in Chapters 14 and 15.
			Workshop#1	Rathdrum Prairie master plan for wastewater, add a reference		X			Text added to USI-EP-4.
			Workshop#1	Interagency agreements about sewer connections		X			Added sentence to UR-6 in Chapter 10, 11, 12, 13, 14 (14 by JER), 15, 16, 17, 18, 19.
			Workshop#1	Mention sewer management districts, Panhandle Health District, Dalton Gardens has a district, cite Dalton Gardens regulations about pumping, check enforcement		X			Added reference in Chapters 10 thru 19, section X.5.9, EP-X Support, Compliment and Enforce Permits, Ordinances, Plans and Activities Relating to NPS P Reduction.
			Workshop#1	Add discussion about measuring phosphorus and sediment to make a relationship for construction sites, forestry, etc.			X		Section 20.3.1.2 text added

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			Workshop#1	Construction sites strip topsoil and may not replace, poor soils, infiltration, additional fertilization			X		Added as consideration in Chapters 10 thru 19, in section X.5.6, UR-X Evaluate and Revise Stormwater Policies.
			Workshop#1	The forest protection act does not address recreation, off road vehicles, how to we recommend to protect WQ, review/change policies? Educational component as well.			X		Added off road vehicles as consideration in 9.5.5.3, SRW-AA-3 and SRW-RM-1.
			Workshop#1	Rangeland condition measurements, add something about measuring stubble height, number and type of grazing animals?		X			Section X.5.5 for 10 through 19 sentence added
			Workshop#1	USI-EP-3 IDL regulates / permits add to the list		X			Added reference in Chapt 14, USI-EP-3.
			Workshop#1	Consider discussion of decaying bark from yarding of logs			X		Section 14.5.9 paragraph added
			Workshop#1	Add text about Lake-A-Syst (sp.?) program			X		Added reference to programs in section X.5.9, EP-X Support, Compliment and Enforce Permits, Ordinances, Plans and Activities Relating to NPS P Reduction in Upper Spokane ID, Pend Oreille Lake, CDA Lake and St Joe chapters.
			Workshop#2	Vision figure shows study starts in 2009 should be 2007.		X			
			Workshop#2	Add pounds reduced pounds along with reduction percent and \$, explain process in text in more detail, step by step				X	Section X.3.4 for 10 through 19 revised
			Workshop#2	Add a summary of the reduction information in a new conclusions Chapter? Also add table with costs in conclusions and executives summary?? Maybe not?	X				Comment noted

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			Workshop#2	Upper CdA is also North Fork Cda, upper is USGS HUC but local is North Fork, first citation put (North Fork) and title but not change elsewhere		X			Text added to Chapter 16.
			Workshop#2	Table of Contents should have chapter name	X				Comment noted
			Workshop#2	Comment - DEQ assumes forest as native undisturbed for baseline and with roads, harvest, human uses, etc., for loads, some controversy of selecting export coefficients at finer scales and with or without some roads	X				Comment noted
			Workshop#2	Comment streambank erosion component is important if not the largest load, streambed movement is also important, episodic events	X				Comment noted
9			Workshop#2	Chapter 9 mention the future of the NPS database, where will it reside, how does it stay updated and available, funded, an entity should take the lead to keep alive as a regional database		X			Included recommendation regarding NPS Database in Chapt 9, 9.5.3, SRW-RM-3.
			Workshop#2	Consistency in messages from agencies, public education, outreach, etc.		X			Addressed in edits re: comments on lines 27 and 35.
			Workshop#2	NRCS standards and specs followed for AG, cannot provide example but cost share agreements for precision management of activities for specific land ownership, mention in CDA-AR-1 and others about the support from conservation districts, relative to economics and productivity as incentives why to do an action/implement BMP		X			Section 13.5.3 and Section 9.5.2
			Workshop#2	Mention atmospheric loads, ie burning, dust. Recommend as an action air quality monitoring to quantify		X			Section 9.5.4 added sentences
			Workshop#2	Add conservation easements, CRP, etc., as an AG action or Existing Program, also EWIP AWEP (sp.?)				X	Addressed in Chapter 20 -Funding Sources

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			Workshop#2	Claim that significant sediment/TP data available, DEQ monitoring but that few have made connection between sediment and TP and when have site specific relationships	X				Comment noted
			Workshop#2	Roads have been inventoried as part of TMDLs		X			Section X.5.4. for 13 through 19 text added
			Workshop#2	Add Tribal Forest Management Plan in Existing Plans			X		Added to HLC-EP-6, CDA-EP-4 and SJR-EP-1.
			Workshop#2	CDA-FR-5 ...objectives.. Sentence is missing some words		X			Section 15.5.4 text revised
			Workshop#2	CDA-UR-3 correct ITD not IDOT. Check throughout that it is Idaho Transportation Department		X			
			Workshop#2	Add information about SEEP program and CESCL related to stormwater erosion education program. Is this regional or subbasin, under support existing programs?			X		Added reference to these and other resources in Chapt 9, SRW-RM-1. Other additions to public education made as part of addressing other comments.
			Workshop#2	CDA-UR-4d unbold sentence starting "DEQ..."		X			
			Workshop#2	There is an inventory of septic systems around CdA Lake. Recommend additional analysis/quantification. Apparently 5 types of septic systems in Idaho. No permits required before 1972. It is tough science to prove. Controversial, apparently some trying to reduce the existing standards/regulations. Even though DEQ has demonstrated in studies that it does make improvements in Lake quality.	X				Recommendation to assess CDA Lake already addressed in CDA-UR-5.
			Workshop#2	CDA-UR-8 delete "per Action" just use see "xxx-xx-#" Change throughout		X			Changes made to all subbasin chapters
			Workshop#2	Missing comma (DEQ, 2005)		X			
			Workshop#2	Add Bay Associations to existing programs or UR-8		X			Researched and added lake associations to CDA Lake, Upper Spokane ID and Pend Oreille subbasin chapters EP activities.

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			Workshop#2	Address fuel and washing soap at docks and marinas		X			Text added to marina-based actions in Chapters 14, 15 and 18.
			Workshop#2	Add/change establishment to enforce no wake zones CDA-UR-9		X			Text included in CDA_UR-9.
			Workshop#2	Add reference to Lake-A-Syst program, Lake Cda program to be in 2012, cite?		X			Text modified within relevant section(s).
			Workshop#2	Change CdA reservation boundary does not cross the water			X		Relevant figures modified.
			Workshop#2	Add 18.5.9 that temperature studies/reviews include evaluation of riparian zone which could be helpful for TP projects		X			Section 18.5.9 sentence added
			Workshop#2	Rose Lake AA-1 questioned, make sure clear text, check accuracy, CH2MHill project,	X				Accuracy checked.
			Workshop#2	Supporting plans, TMDLs are being reviewed, internal documents only	X				Comment noted
			Workshop#2	Temperature TMDLs in progress	X				Comment noted
			Workshop#3	Check history discussion, intent of study/plan is clear, also mention not related to a trading program		X			Confirmed that draft plan addressed comment
			Workshop#3	Add TechMemos as appendix (or in a CD/DVD included with Plan)	X				Comment noted
			Workshop#3	Add land use definitions in a Table in Chapter 3				X	Section 3.1 Sentences and Table added
			Workshop#3	Add discussion that as point sources are reduced, nonpoint sources become a greater percentage of the total loading		X			Added sentence to Exec Sum paragraph 1, chapt 1 paragraph 1 and chapt 9 paragraph 2 of 9.1.
			Workshop#3	9.5.5.3 should not have numbering in front of the action code		X			
			Workshop#3	Long discussion about BMPs including buffers vs. gully plugs, where they work and don't work. BMPs only effective is properly placed, sized, maintained.	X				Comment noted.

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			Workshop#3	Potentially add discussion that some BMPs are for diffuse and some are for concentrated flow, for clarity, BMPs have some site specific issues		X			Section 8.5.5 Paragraphs added
			Workshop#3	Dischargers may not or won't be paying for nps, why economically would a producer do a BMP? No capital not going to happen. May need to recommend an economic study be done to understand how to get implementation to happen.	X				Comment noted
			Workshop#3	BMPs function differently in winter, frozen ground, v. summer, seasonal challenges and difference, consider explaining in text.		X			Section 8.5.5 Paragraphs added
			Workshop#3	No-till is not used consistently even by a single producer, many modified applications of no-till approach, such as by rotation and other ways, no uniform application, action may be to support uniform approaches			X		Section 13.5.3 and Section 9.5.2
			Workshop#3	Mention loan program available for tillage/direct seed		X			Section 13.5.3 and Section 9.5.2
			Workshop#3	Currently lumping too many different tillage practices, need to separate them out, direct drill is different than no till, etc, potentially add sub actions, A,B,C, like stormwater				X	Section 13.5.3 and Section 9.5.2
			Workshop#3	Need to discuss, integrate into text something about using BMPs in combinations, better results with some combinations of BMPs, how to select combinations, etc.			X		Section 8.5.5 Paragraphs added
			Workshop#3	Check literature for more information on no-till, direct drill, PNDSA site, UI/WSU studies, lots of info although maybe not much on NPS TP	X				Addressed in changes to Section 13.5.3 and Section 9.5.2
			Workshop#3	Need to rework all AG text relative to tillage, explain/define the different approaches	X				Comment noted

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			Workshop#3	TP fertilizer is likely one of most expensive applications, don't waste by over fertilizing, precision AG, rates managed tightly, although some do use fertilizer companies which may have conflict of interest	X				Comment noted
			Workshop#3	Some producers may be available to review NPS Plan	X				Comment noted
			Workshop#3	Comment about that actions address both landscape and more localize TP and actions/BMPs to address	X				Comment noted
			Workshop#3	Add an action about residue management and field management along with combinations				X	Section X.5.3 for 10 through 15 text inserted
			Workshop#3	Add action about using biosolids application	X				Comment noted
			Workshop#3	No turkeys, broilers, laying hens, no dairies. Check reference.		X			No change
			Workshop#3	SCD doing livestock inventory, small ops for cattle, horses, sheep, llamas, emus, zebra, chickens, pheasants	X				Comment noted
			Workshop#3	Livestock acces to water is occuring and is bad	X				Comment noted
			Workshop#3	Livestock pasture management is important, areas of overgrazing, fields of mud and manure		X			Section X.5.3 for 10 through 15 text inserted
			Workshop#3	Hobby farms mostly, few if any larger operations. These small farms are less astute to practices than big operations, big ops tightly manage to control costs, wheres small farms may not even understand or know why BMPs helpful managing land, managing costs			X		Added small farm activity to HLC, LWS and USI (RM-1). Also, added sentence to 9.1 paragraph 1.
			Workshop#3	Education for hobby farmers	X				Comment noted
			Workshop#3	SCD has been on every road in the watershed	X				Comment noted
			Workshop#3	Address legacy effects, 20-30yr lag (no ref.), unclear lag of implementing practices, or lag of travel time of TP			X		Section 1.4 Pargraph added

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			Workshop#3	Technology and economics are two biggest factors that result in changes in practices, not a plan, how can we address in plan?	X				Comment noted
			Workshop#3	These are long-term investments for long-term changes, should explain upfront in the plan			X		Added statement in Exec Sum paragraph 2; Chapter 1, section 1.1 paragraph 4; already in 9.1 paragraph 1.
			Workshop#3	Sediment is moved downstream in pulses, (high flows)	X				Comment noted
			Workshop#3	Review use of actions v. activities. Are they same or not? Use consistently			X		Edits to all chapters. Geo editors need to change TOC
			Workshop#3	"R-Map" requirement in WA for road abandonment, must have plan with DNR, road are a big source, add citation, or make sure consistent from another section		X			Section X.5.4 or 10 through 13 text added
			Workshop#3	Road inventory private forests is not very good, only about 20% actual compliance checks if FPA met for harvest in Idaho. Larger operators generally good, smaller ones not, {similar to AG}. How address lots of smaller operations cumulatively causing a loading? What about greater enforcement of FPA?			X		Section X.5.4 for 10 through 19 text added
			Workshop#3	County road maintenance practices create problems, side casting, stream crossings, etc., practices may have improved but still good recommend reievew and more changes			X		Created SRW-AA-4 in Chapter 9.
			Workshop#3	Road closures are unpopular but some are summer roads, unpaved roads big issue	X				Comment noted
			Workshop#3	Education! Add specific groups and users for education possibly as subcategories or bullets		X			Added recommendations regarding groups and resource references to Chapt 9, SRW-RM-1.
			Workshop#3	Practices that cheap runoff diffuse rather than concentrating the flow are better	X				Comment noted.

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			Workshop#3	Clear cutting on reservation is rare now, roads still big issue, esp. communication, some roads do BMPs and then others come in and change, such as flow dips getting graded, avoid concentrated flows		X			Section 15.5.4 text added
			Workshop#3	Working on a grant for Suncrest septic tanks	X				Comment noted
			Workshop#3	Hangman need to split out WA v. ID. Discuss how to do? By activity or other?	X				Comment noted
			Workshop#3	Hangman too WA centered, add equivalent detail for ID , use ID subbasin information				X	Added references in multiple locations to pull in ID references. JER for Urban.
			Workshop#3	Economy is bad so regulations aren't followed or money to enforce, have good intentions with polices but how actually implemented and enforced	X				Comment noted
			Workshop#3	Common themes: Need to mention good stuff has been done, only in the middle of the process, and more to do (big stuff has been done)		X			Added recognition in section 4.1 of all subbasin chapters. Also, added reference in section 1.1 paragraph 5 and 9.1 paragraph 1.
			Workshop#3	Common themes: The cumulative impacts of many small operations/entities is or soon will be likely a greater impact than big operations, the big operations have addressed their impacts and are tightly regulated and overseen as bad guys but it's the small impacts now		X			Added sentence to 9.1 paragraph 1.
			Workshop#3	Need to have a fire response plan in place before the fire, such as funds to fix fire lines, dozer trails, etc., add to fire rehab discussion			X		Section X.5.4 for 10 through 19 text added
			Workshop#3	Reference WSU forestry education programs for small landowners		X			Section X.5.4 for 10 through 13 text added
20			Workshop#3	Suggest tax breaks , or incentives for having management plans, implementing activities, potentially mention with potential funding		X			Added sentence to Chapter 20, section 20.2 Potential Funding Sources.

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			Workshop#3	Fire rehab is a good action	X				Comment noted
			Workshop#3	SCD rangeland inventory and animal counts, mention		X			Section 13.5.5 added text
			Workshop#3	Check UR sections for mention applicability of WA vs. ID communities and proposed actions			X		Urban information edited to include Idaho
Subs	X.3.4	--	Workshop#3	Confusion about the percentages in reduction, should we remove? Modify, change, add explanation? Need additional review from Ecology on this item?			X		Section X.3.4 for 10 through 19 added for example
Subs	HLC-UR-8	--	Workshop#3	Small jurisdictions have no money or ability (technical/otherwise) to comply with all these regulations and recommendations, how can they get help?	X				Comment noted
Subs	HLC-UR-5	--	Workshop#3	Title, what is Hangman Valley? Check all titles, proper geographic citations	X				Comment noted
Subs	Septics	--	Workshop#3	Can dye test drainfields to research flow patterns, but owners won't allow it for fear will show problems they will have to pay to fix, need to offer to fix or provide funds if want to do dye studies to learn about flow patterns	X				Comment noted
Subs	Septics	--	Workshop#3	Can test waters for caffeine, washing soap color whiteners, other human/home products to test if impacted by humans	X				Comment noted
?	?	?	Workshop#3	LandSat used for identification of hotspots	X				Comment noted
Subs	HLC-UR-8	--	Workshop#3	Education, control of pet waste is important, however difficult sell in rural areas	X				Comment noted
--	--	--	Workshop#3	Stakeholder stated this is a useful plan and will be used in grant applications - as we intended	X				Comment noted
Subs	HLC-UR-8	--	Workshop#3	Add similar action about small community support programs to LWS chapter			X		Chapter 10 updated to include LWS-UR-8
--	--	--	Workshop#3	Suncrest is densest population in Stevens County	X				n/a
13	HLC-UR-7	13-27	Workshop#3	Add TumTum to areas of concern with septics		X			Tumtum added to LWS-UR-5.

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13	13.5.7	13-28	Workshop#3	HLC-SA-1 citation may be wrong, is this SCD?		X			Corrected reference in 13.5.7 and reference file.
All	--	--	Workshop#3	Check name, is it SCCD or SCD? Confirm and check consistency throughout	X				Comment noted
?	?	?	Workshop#3	FFFPP, HPAs fisheries permit, removal of fish barriers, cite as reference under existing plans		X			Added reference to 9.5.5 SRW-AA-1, and in chapters 10 thru 19, section X.5.9, EP-X Support, Compliment and Enforce Permits, Ordinances, Plans and Activities Relating to NPS P Reduction.
9	9.5.4	--	Workshop#3	Construction stormwater permit cite throughout or in Chapter 9		X			Added to subbasins EP actions
10	10.5.3	--	Workshop#3	Tillage practices, greater definition, add to LWS subbasin			X		Section 13.5.3 and Section 9.5.2
Subs	--	--	Workshop#3	Add hobby farms to LWS and Hangman, don't use the term hobby farms				X	Addressed as part of response to comment on line 17.
12	12.5.8	26-Dec	Workshop#3	Change terminology in LSR-AA-1 to not use clean-up plans, is this meant to be TMDLs, check and update		X			Changed terminology to TMDL actions, consistent with HLC-EP-2.
12	--	--	Workshop#3	Check that GW studies by Joe Joy are cited in LSR	X				Comment noted
Subs	--	--	Workshop#3	Tillage - subdivide Hangman into different types, A,B,C, sub actions like stormwater	X				Comment noted
All	--	--	Workshop#3	Prioritization is a repeated question, should address upfront why didn't prioritize, message is each entity should use this to help them prioritize what they have control of, selection actions that make sense for them, seek/obtain/set aside funding for that, and make progress reducing NPS TP that they can			X		Section 1.4 paragraph added
All	--	--	Workshop#3	Education is underutilized, very important, add more highlight, emphasis on recommendation			X		Added recommendations to Chapt 9, SRW-RM-1, and as part of responses to other comments on education.

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8	--	--	Workshop#4	Verify that contents of tables match to text, maybe a mismatch between 8.5.3 and Table 8-1			X		Text modified to match text.
8	--	--	Workshop#4	Verify numbers, maybe a mismatch between Table 8-6 and text about efficiency	X				Comment noted
Subs	--	--	Workshop#4	Under each coded activity delete all lines that have TBD, repetition, add discussion or example upfront about this so can remove elsewhere			X		Completed for each chapter
20	--	--	Workshop#4	Chapter 20 identification of potential funding is a good summary and very useful	X				Comment noted
			Workshop#4	New technology, pilot studies, should be encouraged as BMPs, cite "TAPE" (sp.?) program, too limited now with which stormwater BMPs to use, innovation should be encouraged		X			Text added to Chapter 9 under SRW-SA-2
			Workshop#4	Support processes to get more BMPs "approved" by state/federal for use, especially over the aquifer			X		Addressed in Line 156
			Workshop#4	O&M is critical for performance of stormwater BMPs, need to cite	X				Comment noted
			Workshop#4	Recommend coordinating efforts to test some BMPs in the valley	X				Comment noted
			Workshop#4	Have a program that supports monitoring but doesn't result in new issues, some don't want to monitor because could discover new problems which cost more money, incentives to collect data and not penalize someone would be helpful to recommend	X				No change, already addressed in SRW - SA-1 in Chapter 9.
			Workshop#4	Require all water operations with some monitoring to collect TP data including water supply, wastewater, stormwater, irrigation, etc., to learn more about TP's distribution and movement	X				Comment noted
			Workshop#4	USW-UR-4c, delete "low", what does that mean? Relative to what?		X			Low removed from all subbasin chapters

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All	--	--	Workshop#4	USW-UR-5 (Actions xyz) should be consistent in how refer to actions, check throughout			X		Change to all chapters to remove Action XX. Replaced with see XX.
Subs	11.5.6	--	Workshop#4	Clarify source or reasons for stating 1000-ft in USW-UR-7		X			Clarified as requested
			Workshop#4	Mobile homes exempt from STEP			X		RCW reference added to USW-UR-6 in Chapter 11
All	--	--	Workshop#4	State in report why purposely did not prioritize, we have good reasons make sure included, want NPS pollution reductions everywhere	X				Comment noted
All	--	--	Workshop#4	Clearly state upfront, executive summary, how to use, what this plan does and does not include/do/mean	X				Comment noted
All	--	--	Workshop#4	Upfront credit for history, done lots of good activities, continue to do good things, more reductions, should be stated upfront	X				Comment noted
All	--	--	Workshop#4	Expand discussion on public education/outreach			X		Addressed in response to other comments on education.
All	--	--	Workshop#4	What about a Bi-State agency with teeth, that can take actions, coordinate the groups, have group members elected or assigned from other entities that has authority granted such as from EPA/DEQ/Ecology to create bylaws, enforce actions, such as a special district or something, needs to be local members but with watershed viewpoints			X		Addressed in response to comment on line 197. Also, added sentence in Chapt 9, SRW-RM-3.
All	--	--	Workshop#4	Way to setup all local entities to do something rather than fighting over a similar and limited pool of money, if had a group that could better tap into funds and hit priorities, (relates to priorities but then could fall on one entity and others do nothing or gets funds that maybe could have been spent on a bigger source) how balance that out?	X				Comment noted

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All	--	--	Workshop#4	Coordinate effort of group to address water quantity and quality issues, a big picture group but specific actions	X				Comment noted
All	--	--	Workshop#4	Such a oversight type group could also manage data including the NPS Database	X				Comment noted
3	4.1	3-9	Ecology-1	The hydrologic description fails to mention the large and constant groundwater input (~ 240 cfs) in the lower 10 miles of the Little Spokane River. This input is below the USGS gage at Dartford. The groundwater significantly changes the water quality of the Little Spokane River as it enters Lake Spokane.			X		This refers to the Little Spokane River subbasin. Text added to Section 3.4.1.
4	4.2	4-5	Ecology-1	Figure 4.4 appears to show 'high' total phosphorus concentrations along the Coeur d'Alene River that are not mentioned in the text. Why are Idaho locations left out of the narrative?			X		Section 4.4.2 Coeur d'Alene River added to text.
4	4.3	4-8	Ecology-1	Figure 4.5 appears to show 'high' total phosphorus loads along the Coeur d'Alene River that are not mentioned in the text. Why are Idaho locations left out of the narrative?		X			Text added to referenced section.
4	4.4	4-10	Ecology-1	Figure 4.6 Septic tank densities appear to be elevated along the northern shore of Lake Spokane but no mention is made of them in the narrative. It seems they are an important factor considering the analyses in Sections 4.5 and 4.6.		X			This is examined in the last two paragraphs of Section 4.6. and GeoEngineers (2010). A sentence was added to make it clear why the analyses were performed.
4	4.9	4-19	Ecology-1	Why isn't groundwater phosphorus loading along the Lake Spokane shoreline a priority given its proximity and significance (Section 4.5) to the problem?	X				Addressed in above comment.
5	5.1	5-1	Ecology-1	These data look very questionable and do not comply with 'credible data' standards required earlier in the report. The section should be removed.		X			Section 5.1 Presentation of concentrations removed to satisfy Ecology. Remainder of section maintained.

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5	5.2	8-7	Ecology-1	The generalized land use approach to determine priority areas does not consider the overriding importance of land uses in close proximity to the major watercourses and the drainage network. We see major changes of water quality and stream habitat where residential homes and non-commercial farms line the shorelines of the Little Spokane River and Hangman Creek and their tributaries. Most of the forest and range away from the watercourses have very little impact on the water quality. The priority of BMPs get factored away from major sources when the gross quantity of land use is the only consideration.		X			Added a sentence to the fate and transport discussion in Section 1.3 to address this. Also, proximity to surface water was a factor in the prioritization described in Section 4.9.
General			Ecology-1	There is no mention of priorities based on important aquatic communities like redband and rainbow trout habitat. Loading to Lake Coeur d'Alene doesn't appear to be evaluated either. If the aim is to take a comprehensive approach to managing NPS in the basin, maybe other measures than delivery of phosphorus loads to Lake Spokane should be considered		X			Section 1.4 Paragraph added
8	Table 8-2	8-6	Ecology-2	Upper Spokane River is divided into Washington and Idaho; however, Hangman Creek is not divided between the states. Suggest making this change since it affects the distribution of land use types under different jurisdictions.	X				Comment noted
8	Table 8-4	8-8	Ecology-2	Upper Spokane River is divided into Washington and Idaho; however, Hangman Creek is not divided between the states. Suggest making this change since it affects the distribution of land use types under different jurisdictions.	X				Comment noted

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8	Table 8-8	8-15	Ecology-2	Upper Spokane River is divided into Washington and Idaho; however, Hangman Creek is not divided between the states. Suggest making this change since it affects the distribution of land use types under different jurisdictions.	X				Comment noted
8	Table 8-6	8-11	Ecology-2	According to the reference to Harmel et.al. (2006) on page 13-14 in Chapter 13, Conservation Tillage should not be lumped in with No-Till and Direct Seeding. The latter two methods are twice as effective as Conservation Tillage; therefore, this may change the rating in the "Phosphorus Removal Efficiency" column.				X	Section 13.5.3 and Section 9.5.2
8	Table 8-6	8-11	Ecology-2	For no-till/direct seed the rating under "estimated longevity" should be "high." According to the Spokane Conservation District once a producer switches to direct seed it is very unlikely they will convert back to conventional tillage. There is an initial high investment to switch to direct seed (purchase of direct seed drill); if they have made this investment it is likely they sold off their conventional equipment and will not be reverting back.		X			Section 13.5.3 and Section 9.5.2
13	13.5.1	13-14	Ecology-2	If the rating changes suggested above for Table 8-6 are made it would likely elevate No-Till/Direct Seed to make the list of high priority BMPs. Also considering Direct Seed involves large acreage and Erosion Control involves small site specific coverage it has a greater potential to reduce phosphorus over a larger footprint.				X	Section 13.5.1 paragraph added
13	13.5	13-13 thru 13-33	Ecology-2	For some of the Activities/BMPs, can't the Potential P Load Reduction and Range of Costs be estimated based on the information in Chapter 8 and elsewhere in the NPS P Reduction Plan?	X				Comment noted

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13	13.5.4	13-18	Ecology-2	Idaho may have a larger percentage of the forested area than Washington. Therefore, HLC-FR-1, HLC-FR-4, HLC-FR-5 should include information on Idaho efforts, rules, regulations, and programs and not just Washington's.			X		Section 13.5.4 text added
13	13.5.6	13-21	Ecology-2	2 nd sentence – What is the difference between “other urban” and “urban”? Are these defined somewhere else and how does suburban fit into these categories? In lower Hangman there is likely more suburban than urban with all the housing developments.		X			Text added to referenced section.
13	13.5.6	13-21	Ecology-2	Under HLC-UR-1, according to the last sentence the Potential Lead should be the City of Spokane.		X			Text added to referenced section.
13	HLC-UR-3	13-22	Ecology-2	City of Spokane and Spokane County are under state's NPDES permit and therefore under the same regulations. The permit requires addressing water quality issues. Since these permits are statewide and based on federal regulation it is unlikely they will be revised. Was this section intended for unregulated stormwater in smaller towns throughout the watershed? If so that should be explicitly stated.		X			Text added to HLC-UR-3.
13	HLC-UR-7	13-27	Ecology-2	Since septic systems are regulated and permitted by Spokane Regional Health District, they should be listed as the potential lead.	X				No action taken because leads were removed from the actions.
13	HLC-EP-5	13-33	Ecology-2	Since the City of Spokane and Spokane County are the regulatory entities for the Shoreline Master Plans, they should be considered as the potential leads.		X			No action taken because leads were removed from the actions.

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13	HLC-EP-6	13-33	Ecology-2	RCW 90.48 should be included in this list. It is the law that Ecology enforces nonpoint water quality violations under.		X			Added RCW 90.48 reference to WA subbasin chapters and added ID nonpoint program reference to Hangman and ID subbasins.
8	Table 8-8	8-15	Ecology-2	This also applies to associated sections in this chapter. It's very surprising and troubling that direct seed is not considered high priority for Hangman. It's also surprising that the same three BMPs (for the most part) are recommended for nearly all areas and it's all focused on riparian enhancement but little in the way of source (erosion) control. The exclusion of direct seed is based on assumptions or a lack of data at best and will be absolutely essential to reduce sediment in Hangman. Without it, all the riparian buffers (which are also needed) will be ineffective.			X		Section 13.5.1 paragraph added
8	Table 8-8	8-15	Ecology-2	What about stormwater BMPs for the urban areas? It seems that would be a lot more effective and feasible in these particular areas, especially the Upper Spokane.	X				Comment noted

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9	SRW-RM2	9-12	Ecology-2	There is already a Spokane TMDL advisory committee established that has looked extensively at trading opportunities in the context of NPDES permit compliance. Nonpoint source trading with ag, at least as envisioned by this section, is not feasible for a variety of reasons and is not seriously being considered at this time. This report should at least acknowledge the work of this group and it's findings. This advisory committee also effectively serves as the "bi state subbasin coordination group" mentioned in this same section. Ecology intends to keep that group active so a separate group as mentioned here would be unnecessary.			X		Section 9.5.3, SRW-RM-2 and SRW-RM-3 - added sentences to address comment.
9	9.6	9-17	Ecology-2	This section should clarify where the load reduction is met; at the point of BMP application or to the tributary or mainstem. I think in most cases it will be at the point of BMP application.			X		Section 9.6 sentence added
10	Table 10-2	10-3	Ecology-2	For the column "stream distance," is this referring to any stream in the Spokane watershed or specific streams (1 st order, major tribs, etc)?		X			Section X.2 for 10 through 19 footnote eaded
10	Table 10-4	10-10	Ecology-2	What is the "high – med – low" category determinations based on? The note does not define how the criteria were determined.		X			Section X.4.3 for 10 through 19 footnoted modified
10	10.5.3	10-11	Ecology-2	These appear to be NRCS BMPs (FOTGs). If so, they should be referenced as they give more technical details.		X			Section 8.3 added
Introduction			City of Post Falls, Idaho	it should be emphasized that TP reductions from nonpoint source BMPS may not be discernable for decades, and the regulatory time frame should be adjusted accordingly.	X				Comment noted

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			City of Post Falls, Idaho	it would be useful to recognize the need for a regional data warehouse to maintain all water quality data, reports, photos, etc. for the Spokane River basin. The more this need is emphasized in reports, momentum might build to make it happen someday.		X			Included recommendation regarding regional data warehouse in Chapt 9, 9.5.3, SRW-RM-3.
Subbasin tables			City of Post Falls, Idaho	In the table(s) that summarizes the assumed sub-basin TP reductions and estimated costs, it would be useful to include the estimated TP load reductions (pounds per year) for each.	X				Comment noted
		16-4	USFS	There are some private properties that are either hard to see or not on the map (Figure 16.1) (ex. Horse Haven in Iron Creek drainage)			X		Referenced figure modified to improve resolution.
		16-13	USFS	Many of the listed BMP's are already occurring on federal and State lands. On federal lands there are roads analysis (identifying the minimum # of roads needed) done for all large scale projects, there are numerous watershed condition assessments that have restoration plans associated with them and BMP's are (supposed to be) implemented on all projects. NPS objectives along nearshore properties may be harder to implement, but may be more bang for buck in terms of meeting objectives.	X				Comment noted
		16.5.9	USFS	There are many public documents that include assessments, prioritized and NEPA cleared projects, and monitoring recommendations that would support NPS reductions on Forest Land in the CDA River. There are however, few dollars available to implement these. In addition to more assessments there needs to be more dollars available to implement the identified projects.	X				Comment noted. Need for funding discussed in Chapt 20.

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		17.4.1	USFS	“State and federal agencies should review activities occurring on the land, identify potential impacts, and implement applicable BMP” this is already part of the USFS Forest Plan Direction for the Idaho Panhandle National Forest.	X	X			Comment noted
	Table 20.1		USFS	This is a great compilation of potential funding sources	X				Comment noted
		20.3.15.5	USFS	There have been reports and published papers on the effectiveness of many of these BMP’s (example Forest Plan Monitoring Documents). Monitoring of the actual implementation – did it occur – can be another story.	X				Comment noted
16			USFS	There was mention of Iron Creek and Burnt Cabin Creek as major sources for the North Fork CDA River – we have assessments for both of these drainages and are in the process of NEPA clearing a large road decommissioning (172 miles) and stream restoration (6 miles)project in Iron Creek Drainage (Moose Drool Watershed Restoration Plan). Now we need the money to implement them.		X			Added reference to these assessments in 16.5.9.
13	123?		Lands Council	Low Impact Development can be superior to standard grassy swales in urban and suburban areas and is worth mentioning, as it is going to be part of Ecology’s Phase 2 Stormwater permits.		X			LID addressed in HLC_UR-8 for small municipalities. Sentence added to HLC_UR-3 for larger municipalities.
	HLC-AA-1		Lands Council	WA has just banned phosphorus in lawn fertilizers, this section should reflect this.		X			Edited AA-1 in chapt 10, 11, 12, and 13.
	HLC-AA-02		Lands Council	Nearshore bank stabilization. 1 st and 2 nd order streams can benefit from beaver placement – which reduces sediment and can store groundwater, thereby increasing late season flows		X			Added sentence to Chapt 13, HLC-AA-2.

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20		20-1 to 20-12	HDR	Table 20-2 and -3 (wow, those are some pretty low NPS & GW TP conc - <0.05 mg/L, good luck, barely measureable in some instances w/o some really good lab DL levels, the best we've seen is around 0.001 mg/L). What are the TP DLs being used? If too high may never be able to assess if BMPs are working just because of DL issues.			X		Section 20.3.1.1 text added
			Sharpley	1. Page ES-1. Does the NPS Reduction Plan really go into the level of detail of indentifying individual landowners? It would be also listing major contributors.		X			Added "major" before land owners on page ES-1, third bullet.
Exec Summary			Sharpley	2. Page ES-1. Next to last paragraph. It might be god to define BMPs here, as the Executive Summary might be all some read, it should stand alone.		X			Added "Best Management Practices (BMPs)" at first use of BMP.
Exec Summary			Sharpley	3. Page ES-1. End of paragraph. I would delineate the BMPs a little differently. There are more than physical and educational and I think that could be expressed here. What about something along the lines of "structural (e.g., treatment, trapping, and minimizing transport) and nonstructural (e.g., nutrient source management and education)?		X			Expanded examples of structural and nonstructural BMPs at end of ES-1.
Exec Summary			Sharpley	4. Page ES-1. Last paragraph. "A wide range of stakeholders" might be better than "interested parties."		X			Changed "range of interested parties" to "wide range of stakeholders" at top of ES-2.
Exec Summary			Sharpley	5. Page ES-2. Last paragraph. The following sentence is unclear as to its meaning. "Available funds may be spent to take the recommended actions or implement BMPs immediately." It seems to stand out and be disconnected from the surrounding text.		X			Reworded last paragraph on ES-2 to make it more clear.

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Exec Summary			Sharpley	6. Page ES-3. Off the four BMPs ranked as highest priority, there was no conservation tillage or urban stormwater retention treatment, etc. The four given basically all focus on the stream and near stream areas and the trapping of sediment and associated nutrients already detached, mobilized, and transported in runoff. There must be a concerted effort to reduce these contaminants at the source as well. I realize they are discussed later but you may want to make the point early on that there will be a suite of factors needed. I guess no nonstructural BMPs fell out then? PLOAD seems to identify some of these. In fact, it is a little unclear that the two assessments of what seemingly from the text to address P reduction in the Spokane River Watershed, selected very different BMPs.		X			Added reference to importance of taking actions to minimize P mobilization and transport in runoff on ES-3 second to last paragraph.
Exec Summary			Sharpley	7. Page ES-4. The maximum values of P loss in ground and surface water is 0.5 lbs/ac/yr. is this correct? Is the potential for P loading from ground waters as a high as surface water? This would be surprising, unless you have very shallow sandy soils.	X				Back checked P loss value. No edits necessary.
Exec Summary			Sharpley	8. Page ES-4. End of Findings paragraph. While it is true that BMPs should be first targeted to critical source areas in the watershed, good environmental stewardship must be practiced throughout the watershed, irrespective of risk.	X				Reviewed paragraph and determined that last sentence addresses this point.

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Exec Summary			Sharpley	9. General. Are you advocating a two-phased approach where the "low hanging fruit" are dealt with first and then more costly measures in an adaptive approach? NRCS are promoting adaptive management as a strategy and are developing some technical guidelines for cost-share programs. It does involve monitoring, which you mention later and in Chapter 20. Good.	X				The plan encourages both immediate and long-term implementation of actions throughout the watershed, with consideration of the priorities identified. Adaptive management is addressed in Chapter 20.
Exec Summary			Sharpley	10. Great Figure ES-1.	X				Comment noted.
			Sharpley	Spokane County NPS Plan - Hangman Ag Actions andy.docx			X		Section 13.5.3 and Section 9.5.2
			Sharpley	Spokane County NPS Plan - Hangman Ag Actions andy.docx What about addressing legacy the effects of past management? This may be particularly important given the high erosion potential in the watershed area, which has contributed sediment to area streams and lakes that contains P for a long period of time. This sedimentary P will be released slowly and for a long time to the overlying water column. This must be addressed to alleviate the issue of the input of this source of P from masking the benefits or reductions achieved with nonpoint source reduction strategies outlined in this report.	X				Comment noted - second paragraph added to Chapter 9.