

Riverkeeper, Lands Council comments

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To: Whitman, Kara Michelle; Page, Chris

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Attachments: Task Force Document RICK ~1.docx (50 KB) ; Alternate EPA feedback fo~1.docx (23 KB)

Hi Kara,

1. The first doc is simply the document that Lisa generated with the track changes of The Lands Council and Riverkeeper - they are attached.

In general we advocated for not editorializing (or using adjectives that describe) on the superiority of SRRTTF accomplishments over an imaginary TMDL process. We felt this is counter-productive to simply telling the story of the SRRTTF and its accomplishments to date.

Also, including timelines and checkpoint is very important.

2. The second document is one that I put together in a brainstorm. What follows are thoughts to the group about how an alternate format might work in relation to "goals, timelines and checkpoints" **I am not married to this idea** - just thought it might help w/communications:

1. At the heart of what the EPA needs to provide to the Judge– (this language is from the court order): *"Specifically, the EPA shall work with Ecology to create a definite schedule with concrete goals, including: clear statements on how the Task Force will assist in creating a PCB TMDL in the Spokane River by reducing scientific uncertainty; quantifiable metrics **to measure progress toward that goal; regular checkpoints at which Ecology and the EPA will evaluate progress; a reasonable end date, at which time Ecology will finalize and submit the TMDL for the EPA's approval or disapproval; and firm commitments to reducing PCB production from known sources in the interim."***
2. The potential framework is already spelled out in the MOA (see <http://srrttf.org/wp-content/uploads/2012/07/SRRTTF-MOA-Final-1-23-2012.pdf> . Page 8 and 9 are at the heart of it. Specific Task Force Goals Relating to NPDES Permit Compliance (pg 8) has guided the work thus far and will until the next permitting cycle. I recommend simply listing the SRRTTF Goals in the MOA, the accomplishments, when they occurred, and then list future goals, benchmarks or "checkpoints" for success and sequence these checkpoints on timelines. Let the "story" that the EPA has requested emerge out of the document format.

In terms of format, each section could have a narrative introduction and then simply table out the **Goals, Actions, Status, Checkpoints and Timelines**. I started this as an example... if this is done, just fill in the boxes with small narrative summaries.

See the document attached as an example (the narrative in the boxes is just to convey the idea of formatting change...).

Just some thoughts.

Thanks!

Jerry W