**Comments from Jerry White (Riverkeeper) 6/24/16**

Please find the draft Memo 2b and fact sheet with my comments/edits attached.

To summarize, my comments focus in the following areas:

1.       I added a bullet that elaborated on the purpose of Memo 2 b to include a future vision for the development of Control Action (CA) implementation timelines, interim PCB reduction targets and effectiveness monitoring.  While these may lie outside the context of Memo 2b, I now feel the inclusion of these components into a draft comprehensive plan are essential if the plan is to be successful. This certainly begs the question of how to construct that process so that these components are included in the draft plan that is issued in September.

2.       I added an implementation and effectiveness timeframes into the operating principles section of memo 2b

3.       I added a section into the “Review of the Control Actions” that addresses the relation of CA’s to regulatory/voluntary programs (NPDES, etc) – this is important because it helps orient the process of final selection. I also added a review principle of looking at relevance of CAs from a timeline standpoint.

4.       Under Review Factors” I added a section called “Implementation and Effectiveness Timeframes”  As the SRRTTF evaluates these CAs on the 27 of July, it will be helpful to understand the degree to which we can expect near, mid to long term implementation schedules/effectiveness schedules.

5.       I asked for more specificity inside 2b under Review Findings… I asked to get specific lists of dischargers included – any entity holding permits that are under regulatory programs should be listed or included in an Appendix B.

6.       Added a request for specific advantages and disadvantages of each one of these plans. Unique challenges that are watershed specific that make them comparable or different than our situation? Clarification: assess these TMDLs for any apparent advantages and/or disadvantages.  I was hoping LimnoTech could look at these (TMDL) plans and report (briefly) if there were anything in them we should incorporate, or conversely, avoid.

7.       Added more verbiage under Potential Guiding for Prioritizing Control Actions – mostly under “Maintaining Existing Control Actions”.  I added what I thought were explicit reasons for consistency, openness and connection between the NPDES permits, and why this is beneficial to understanding and generating an effective comprehensive plan. (Pg 8)

8.       Added a several points for a future vision for the development of implementation timelines, interim PCB reduction targets and effectiveness monitoring – (Pg 8)

9.       Added a Timeframe and Effectiveness of CA component to the schema near the end of 2b.  This may help folks filter CAs based on near, mid and long term implementation timeframes and effectiveness timeframes of each CA (as per our SRRTTF discussion on the 22nd)

10.   Added the “Time Frame” component to the Fact Sheet… it would be helpful if all CA fact Sheets spoke to time frames for implementation and effectiveness where possible. I also added a component to the Factsheet that connected CA to regulatory/Voluntary program for the reader.

This adds a new dimension to the process, and adds several smaller complexities to the evaluation of the CAs.  I hope that they might improve the process and lead to a more effective Comprehensive Plan.  These comments are probably it for me, but if I catch anything else soon I will toss those thoughts your way.

Thanks for your work on this, and have a good weekend.

Jerry White, Jr