

## **Additional WQMP questions**

Page 1 “Section 208(b)(2)(F)-(K) of the federal Clean Water Act (CWA) requires the development of a State-based process to identify, if appropriate, agricultural, silvicultural and other NPSs of pollution and to set forth procedures and methods, including land use requirements, to control to the extent feasible such sources.”

**Since the USEPA no longer provides funds for this planning, it no longer requires compliance with section 208, so this paragraph should be modified.**

Page 2 “If subsequent evaluation indicates that approved and properly installed BMPs are not achieving water quality standards, the State should take steps to: (1) revise the BMPs.”

**The State should require the FS to revise the BMPs, and then approve of the new language. They can't revise the BMPs themselves.**

Page 3 “The BMPs in this WQMP are deliberately general and non-prescriptive. They require the development of site-specific prescriptions based on local site conditions requirements to achieve State water quality standards. Watershed specialists (hydrologists, soil scientists, geologists and/or fish biologists), or other trained and qualified individuals, use the applicable techniques suggested herein to develop site-specific BMP prescriptions to be applied to a specific project to protect water, aquatic and riparian resources. These site-specific BMP prescriptions are displayed as mitigation measures, physical design limitations, or specific operating instructions in the project's NEPA documentation. These prescriptions must then be transferred to enforceable language in the project's authorization(s) provisions, contract specifications or building plans. Lastly, the provisions, specifications or plans must be administered on the ground to ensure compliance. Each step in this chain is an essential component of protecting water quality. Implementation failures can usually be traced back to one of these steps.”

**How does the State evaluate these site-specific prescriptions? What is the enforcement language that is transferred? It would be useful to show examples of site-specific BMP prescriptions and enforcement language for previous projects for each of the five areas that currently are being addressed by the revised WQMP.**