Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Addendum	Response from the Office of Water
There was also talk of some bigger changes to NPS progress measures (maybe in the same vein as TMDL vision, maybe not). Is that still on the table? Are we anticipating a WQ-10b, c, etc?	*Angie Brown – Indiana Dept of Environmental Management, Nonpoint Source Program*	*Appendix B: Computational Guidance, pg 18-20*	Thank you for your comment. In FY16 and beyond the NPS program will explore adopting another metric that tracks progress towards meeting water quality standards. As work continues and options are developed, EPA will reach out to the states and others to solicit feedback on any proposed measures.
On the computational guidance: regardless of how many "stories" are officially turned in, does each waterbody/pollutant combination count as 1 impairment removed against this measure? What I mean is this: say next year a state turns in an original Success Story showing 2 impairments removed, then in a later FFY submits an update to include a 3rd impairment removed. Only 2 reports will have been made, but 3 impairments removed. When EPA is developing commitments for states, would the above scenario count as 2 (reports) or 3 (impairments) against the measure?	*Angie Brown – Indiana Dept of Environmental Management, Nonpoint Source Program*	*Appendix B: Computational Guidance, pg 18-20*	Thank you for your comment. As noted in your comment, each waterbody/pollutant combination would count as one distinct impairment removed. Each impairment removed -- whether reported as a Success Story or an Update -- would count as a commitment/result under this measure.
Currently, Idaho does not compile our own success stories; all success stories are generated by an EPA contractor. If use of a contractor continues, the use of "Updates" for gaining credits for removal of additional impairments is somewhat irrelevant. If IDEQ were to be more involved with success stories it is likely the IR coordinator would work with the regional offices to initiate the update, but the regional offices would ultimately be reporting. It would be ideal if the success story and update submission could occur within the new ADB/ATTAINS database, so that all of those reporting activities occur in one place.	*Cara Hastings, IDEQ*	*Appendix B, pages 18-20*	The NPS program is working to streamline Success Story data entry and appreciates your feedback regarding a more centralized strategy. Our current plan is to redevelop a Success Story Database within the 319 Grants Reporting and Tracking System (GRTS) to provide effective connection of the data with other 319 program data.
It appears that the list of information required for submission of Success stories and Updates as currently proposed is adequate, although increased use of spatial statistics, like those used in measures 27 and 28, might be useful	*Cara Hastings, IDEQ*	*Appendix B, pages 18-20*	Thank you for your comment. Enhancing integration of NPS information with geo-data resources is in the long term plan for the NPS program. As the Water Quality Framework (basis for WQ-27/28) continues to develop it will eventually be connected to the 319 Grants Reporting & Tracking System and enable geomapping of NPS program information and potentially metrics.
For communication to the public, the described format is adequate. For use by regulators and land managers more in depth information may be needed. Perhaps links to technical documents could be an additional requirement.	*Cara Hastings, IDEQ*	*Appendix B, pages 18-20*	Thank you for your comment. We appreciate the feedback on utility of the information or public audiences. We will continue to consider whether additional technical information would be a benefit to Success Story documentation for other audiences.
Successes (by individual AU impairment) may number as high as 30 (+) per reporting cycle.	*Cara Hastings, IDEQ*	*Appendix B, pages 18-20*	Thank you for your comment. Understanding the number of expected impairments removed helps the NPS program gauge the importance of altering this measure, and will provide further insight into measure development in the future.
Under Methodology for computation of results, the 3rd bullet point states that the impairment shall be removed from the state 303(d) list. It appears that the intent as discussed in the document includes impairments which are in Category 4 (have a completed TMDL) that have been removed as an impairment. Can you clarify this section to make that explicit?	*John Pate, Alabama Department of Environmental Management*	Appendix B, Methodology Pages 18-19	Thank you for pointing out this discrepancy. The intent is to also count Category 4 waters that have been restored and are no longer impaired. We will revise bullet 3 on page one to clearly acknowledge this.

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Addendum	Response from the Office of Water
Can you provide details on the process by which a State informs EPA that an impairment has been removed from a waterbody in Category 4 which has multiple impairments? As an example, we have a waterbody which is impaired by siltation (a NPS impairment) and lead (a direct discharge). BMPs are implemented, and the siltation impairment is removed, but it still remains in Category 4 for lead. How do we show that the NPS component has been removed?	*John Pate, Alabama Department of Environmental Management*	Appendix B, Methodology Pages 18-19	The process for informing EPA of a move of one waterbody-pollutant combination from Category 4 to Category 2 is through the biannual Integrated Report process. For the purposes of measure WQ-10(a) and Success Stories, a statement that the state intends to move a waterbody pollutant combination out of Category 4 will suffice. We will add a note to the measure definition to clarify.
This appears to limit the measure to 303(d) listings and removal. Could this language be clarified to include NPS impairments that were in Category 4?	*John Pate, Alabama Department of Environmental Management*	Appendix B, Methodology Pages 18-19	Thank you for pointing out this discrepancy. The intent is to also count Category 4 waters that have been restored and are no longer impaired. We will revise bullet 3 on page one to clearly acknowledge this.
WQ-10a NPS "success stories" measure is an area that directly impacts the 319 program for state agencies. Option 2a for SP- 12 Watershed improvement measures is where NYS would like to go. Following is Option 2a, which is an option NYS would advocate: Watershed-wide improvement • Demonstrate water quality improvement at watershed scale using water quality monitoring data. • The data must demonstrate evidence of a positive trend/change that accounts for a significant portion of the nonattainment gap for key parameters/indicators. **Option 2a:** Accepted statistical procedures • Statistically significant improvement in >=90% level of confidence • Supporting documentation describes the environmental significance of the reported WQ changes Parameters= • Specific parameters listed as cause of impairment on 2002 303(d) or Integrated Report (Categories 5, 4a, 4b, 4c) OR • Parameters , loadings, indices directly related to designated use impairments Watershed-wide = monitoring design is representative of spatial variability within in watershed is appropriate for the listing and parameter assessed. Documentation for the improvement would need to explain how monitoring data is representative (check if CSLAP monitoring applicable). Valid Scientific information= based on objective, accepted monitoring and assessment approaches. Data is accessible.	*NYSDEC*	Pages 18-20	Thank you for your comments. The WQ-10(a) measure language is intended to track successes at a waterbody-scale. The NPS program appreciates NYSDEC's desire to report success at the watershed scale and this will remain an option under existing measure SP-12.

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Addendum	Response from the Office of Water
Lead and Copper Rule: We agree with the activities laid out in the draft document on this topic, including developing proposed revisions to the LCR, considering the recommendations of the National Drinking Water Advisory Council (NDWAC) and the lessons learned from the Flint, MI lead in drinking water crisis. We believe states need to be "at the table" for those discussions so that state perspectives and experiences and can be fully considered. We also note the numerous guidance and policy elements that have already been issued or will shortly be developed, to enhance our collective implementation and oversight of the rule -- concurrent with development of proposed rule revisions. States anticipate a growing and sustained workload, associated with stepped-up attention to this rule, hat will need to be accommodated in their overall priority and workload planning with the EPA Regions.	*ASDWA*		We appreciate the guidance and assistance provided by States as EPA addresses current lead issues and revises the Lead and Copper Rule. EPA believes that ASDWA/State involvement is invaluable during the development of NPDWRs and will continue to seek ASDWA/state's perspectives during the development of NPDWRs. It is important that EPA and States dialog balances resources and public health protection/compliance with drinking water regulations during the workload planning process.
Harmful Algal Blooms: HABs and their associated cyanotoxins continue to threaten sources of drinking water and the challenge is likely to only intensify in the months and years to come – and become, unfortunately, the "new normal" (witness the main stem of the Ohio River covered by an algal mat for much of the summer of 2015). States thus agree with the continuing focus on this area and anticipate working with the Agency (and other stakeholders) on carrying out the elements of the November 2015 strategy submitted to Congress ("Algal Toxin Risk Assessment and Management Strategic Plan for Drinking Water"). States also plan to continue to work with individual water systems to avoid or mitigate the impacts of HABs and associated cyanotoxins. State drinking water programs also believe that this aspect of the NPM needs to be coupled with ongoing and sustained efforts of the Clean Water Act-related portions of the NPM that are designed to help address the root causes of HABs – namely, nitrogen and phosphorus pollution.	*ASDWA*		The EPA appreciates the States support for continued focus on HABs. We agree that to successfully mitigate HABs and their toxins in drinking water, relevant Safe Drinking Water and Clean Water Act programs both need to be utilized efficiently to reduce the root causes of HABs, specifically nutrient pollution. In EPA's November 2015 "Algal Toxin Risk Assessment and Management Strategic Plan for Drinking Water", the EPA encourages drinking water stakeholders to consider both short-term solutions for managing cyanotoxins in public water systems as well as long-term efforts that focus on source water protection activities. The EPA is committed to working with partners to encourage source water protection solutions to HABs issues. Some of these activities include: encouraging states to work towards developing and implementing nutrient reduction frameworks to identify their specific sources of nutrient pollution and prioritize watersheds and actions they will take to reduce these sources; providing funding for key projects to reduce point and nonpoint source nutrient pollution and reduce hypoxia; performing and supporting research on nitrogen and phosphorus pollution-related topics; conducting regional-level workshops to address HABs' impacts on drinking water and encourage activities to protect drinking water sources; developing and utilizing mapping and data sharing tools to target nutrient reduction activities; and continuing to develop tools that use the strengths of the CWA and SDWA programs to protect drinking water through in the national Source Water Collaborative.

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FY 2016-2017 Agency Priority Goal on Drinking Water & Wastewater Preparedness and Resiliency: We agree with the emphasis, in this goal, on high risk and vulnerable communities and the plan to develop tools and trainings for 1,000 operators of small water utilities. There have been a number of tools and guidances developed in recent years (by EPA, FEMA, AWWA, and other partners) that lend themselves to the types of training envisioned under this item. We would suggest, however, that the emphasis be on reaching as many vulnerable communities as possible through various means (e.g., face-to-face training, convening workshops, webinars, etc.) The 1,000 number strikes as somewhat arbitrary and doesn't account for the multiplicative effect of various delivery means.	*ASDWA*		Although every water utility in the country must contend with potentially disruptive incidents, EPA is targeting its tools and training to those utilities specifically vulnerable to severe drought, flooding, cybersecurity, and climate change, such that utilities trained fall into one of these four threat types. Also, based on the overwhelming interest in the initial training EPA is revising the targeted group to account for 5,000 drinking water, wastewater, and stormwater utilities.
Science Advisory Board Recommendations: The Agency plans to publish a proposed regulation for perchlorate, based on the health effects input of EPA-ORD and FDA. As with the LCR revision, states will need to consult closely with the Agency as it fashions a proposed rule and considers both the risk assessment information about perchlorate as well as the various risk management considerations.	*ASDWA*		EPA believes that ASDWA/State involvement is invaluable during the development of NPDWRs and will continue to seek ASDWA/state's perspectives during the development of the proposed perchlorate regulation.
National/State Priorities: We recommend that EPA Regions be encouraged to consider these various national priorities (both the original program measures and this addendum) in the context of state-specific and region-specific goals and priorities. For instance, HABs may be a relatively unimportant issue for some states, but those same states may particularly challenged by their own localized issues and priorities. These adjustments should be able to be made within the context of Region-state negotiations.	*ASDWA*		EPA agrees with this comment and believes there is sufficient flexibility within the negotiation process to consider state-specific and region-specific issues and priorities. Adjustments to the commitments by the state or region need to clearly articulate the basis for the adjustment, how resources will be applied to the higher priority issue, and the expected outcome of those efforts.
PWSS: We also note that the principal Federal grant to states, the Public Water Supply Supervision (PWSS) grant, has been essentially "flat-lined" for the past decade. (In fact, given the fact that former state security grant of $5 million yearly has been discontinued, state actually receive less than a decade ago.). While we recognize that the President's FY 17 budget request has already been made, we offer this observation as both a "marker" for the FY 18 request and to point out the need for accommodation in priority-setting, in light of these budget limitations.	*ASDWA*		EPA is committed to continuing to request increases to support the States via the PWSS grants to balance/address challenges public water systems are facing today. It is important that EPA and States dialog balances resources and public health protection/compliance with drinking water regulations during the workload planning process.

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Addendum	Response from the Office of Water
I believe that somewhere in the language you should include voluntary or similar wording. The language reads similar to regulatory requirements, and we all understand that dealing with the majority of the NPS pollutants is a voluntary process. This should be noted. There is language that the NPS impairment shall be listed on the state's 303(d) list or Integrated Report. I've inserted a paragraph from Part C of the recent 319 Guidelines. We know that a TMDL isn't developed without an impairment, but there are situations in which watershed plans can be developed prior to or in concert with the TMDL. During that process there is a discovery period (mostly more intensive monitoring and source tracking for up to a year) that identifies cause and sources, and the sections of the watershed that needs help. This is true for TMDLs and in some cases for watershed plan development. During that discovery process it is possible that a portion of the stream or one of its tributaries (not previously identified/listed) could be found to be impaired. The watershed plan should still address the impairment even though it's not listed. And depending on the timing it may not be listed for several years. I believe that if the impairment is verified by credible evidence then the elimination of it, regardless of a listing should qualify.	*West Virginia NPS Coordinator*	Appedix B	Thank you. The NPS Program supports efforts to develop comprehensive watershed based plans, and recognizes importance of performing work delivering water quality improvements in non-303(d) listed waterbodies. At the same time it is useful to have a defined universe for any measure. We will consider whether it is possible to include reference to unlisted waters in the measure language. We are also exploring other metrics of interim water quality progress and may be able to include unlisted waters in those efforts.
The Nonpoint Success Story is an excellent tool for publicizing our successes. I appreciate the need for an informative summary but as you know it is sometimes difficult to tell the story in only two-pages. However, we've all adapted and that's our standard. What puzzles me some is the follow-up story, the "UPDATE". If you compare the types of information it is the same as the original success story. And even though the update is most likely from an on-going multi-year project, it is still another success story in and of itself, and should have the same oomph as the original. It often takes multiple years, and multiple types of the implementation to see improvements in our watersheds. All of this effort should count the same regardless of whether it's a continuation or another phase of an existing project.	*West Virginia NPS Coordinator*	Appedix B	Thank you for your comment. Use of the term "UPDATE" has been proposed to distinguish between: impairments removed from a waterbody that has not previously been reported, and additional impairments removed from a previously-reported waterbody; we agree that the required information is similar for both Success Stories and Updates. A difference is that an Update doesn't *require* a full new story; however if a state would like to work with EPA to develop a full story, we may be able to accommodate that. We will give this consideration.
How do states envision using the *(story)* Updates? That remains to be seen	*West Virginia NPS Coordinator*	Appedix B	Thank you for your comment.
What information would be most important and useful to collect? I believe the information within the success story as it is now is useful and important. What I would add and perhaps expand upon it the public perception of the project. How were their lives impacted, changed for the better.)	*West Virginia NPS Coordinator*	Appedix B	Thank you for your comment. The suggestion described in your comment will be considered moving forward.
Is the proposed length too short or too long to support effective communication of results? That really depends of the intensity of the problem. I believe that two-pages is adequate but there are situations where some of the message may be lost within that length. I definitely believe that an UPDATE to a story deserves just as much length as the original, depending on the situation of course.	*West Virginia NPS Coordinator*	Appedix B	Thank you for your comment. The NPS Program appreciates your thoughts on the proposed length and content of Success Stories and Updates and as noted above we will give consideration to the option of allowing a full story for an Update when a state desires to do so.

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Addendum	Response from the Office of Water
If possible to forecast, how many additional water quality successes would your state expect under the proposed measure revision? I don't believe these changes will result in any additional stories due to the length of time to get them approved. Although there has been improvement, it usually takes a significant amount of time for feedback, and for stories to be published	*West Virginia NPS Coordinator*	Appedix B	Thank you for your comment. The NPS Program appreciates your thoughts on the expected number of additional Success Stories and/or Updates.