

Region 4 Minimum Elements of a Prioritization Framework Document:

- **Mechanism for prioritization** (e.g., Recovery Potential Screening Tool, Nutrient Framework (Stoner) Memo, cost/benefit analysis, etc. – See “ELI Menu of Approaches”)
- **Factors considered** in prioritization (such as indicators used in Recovery Potential Screening, pollutants/impairments, sources, etc.)
- **Consideration of EPA National and Regional Priorities.** The document should explain how the state collaborates with the Region on prioritization and how EPA’s priorities fit into the State’s Framework. This does not mean the state must choose EPA priorities as their designations, rather the state should recognize the Agency’s priorities as an important factor in this process.
- **Plan for where the state will begin work;** this may be very general, based on Rotating Basin Scheduling, monitoring or permitting cycle, or other appropriate process.
- **Statement on flexibility** and state’s approach to changing priorities.
- **Description of shifts or changes** from the past prioritization scheme compared to what the state will be doing under the new Vision. Be clear about what’s different or new; highlighting what’s the same can be just as helpful to the public and other partners.
- **Public engagement approach.** How will the state involve the public in the process? How will the state share the final designated priorities with stakeholders? At a minimum, priorities should be clearly identified in the 2016 IR for the public to provide comments.

Other Elements to Consider:

- **When and how the state will review and update the prioritization scheme.** Assessment is a critical piece of the new Vision; states should consider how they will adapt to new information on the status of waters, interest and engagement from stakeholders and partners, and the effectiveness of their chosen scheme.
- **Choice of priority designations.** Once the state has completed the Framework Document and gone through the process to determine their priorities, it would be appropriate to include that information as an appendix/update to the document.
- **Availability of Framework Documents to the public.** Although these documents are not subject to public notice requirements or EPA approval, states should consider making documents available to the public, on their websites, or through other means to facilitate transparency and public engagement.

The Region recognizes that how states address these elements, both in their documents and in practice, will be different. The intent of including these minimum elements is ensure states have a document that the TMDL/303(d) program can provide to other state programs, partner Agencies and public stakeholders that explains and defends the choices to provide limited state time and resources to one area versus another.