

Appendix P: Response to Reviewer Comments

Comment From...	Dated	Comments
David McAllister, Oregon Department of Fish and Wildlife	6/24/98	<p>Concerns over healthy riparian condition (HRC) definition terms for structure, species composition, vegetative cover, width, and bank erosion — modified HRC in HAB-06.</p> <p>Inaccuracies in conifer basal areas required by Forest Practices Act vs. Draft State Forest HCP. Problems with desired future riparian condition in large, medium, and small Type F streams — modified tables and text in Chapter 3: Management Framework.</p> <p>Increased tree retention in Draft HCP standards will not be the major factor in near-term sediment reduction; rather this should occur mainly to improved road and unstable slope management — OK, removed HCP from sediment discussion.</p> <p>Delete word dredge from authority of Section 404 Removal Fill Permits, p. 1-16. This portion of CWA regs placement of fill and dredged material, but not dredging — done.</p> <p>Better develop hardwood conversion activities and add adaptive management measures — included in HAB-05.</p> <p>Recommend that habitat improvement projects mimic natural processes, avoiding "engineered" approaches to instream habitat: e.g.: adding large wood to aquatic systems in a random pattern, letting hydrologic processes place it. For consistency, that means no rock barbs. Response — While rock barbs are primarily a bank stabilization technique, e.g. used to protect property or roads, bioengineered rock barbs in particular have many habitat benefits, especially when compared with older alternatives such as riprap. ODFW's OPSW Oregon Aquatic Habitat Restoration and Enhancement Guide offers guidance for situations when barbs are appropriate.</p> <p>Recommend a minimum 50' riparian buffer — rejected numerical standard for riparian buffers; used healthy riparian condition standards.</p> <p>Add ODFW Riparian Tax Incentive Program to "provide breaks on property taxes for lands with ODFW-approved wildlife management plans. SB-791)." — included in HAB-11; but should be further developed.</p> <p>Support ordinances to leave large woody debris in aquatic habitats; but oppose exception to allow wood removal for "driftwood collecting and lumber milling in-place." No regulatory process outside of state-owned tidelands or forestlands — modified HAB-15.</p> <p>The County Estuary Management Plan should include new criteria to evaluate aquaculture in the Bay — HAB-23 modified, but no specific reference to aquaculture.</p> <p>Need to acquire private estuary aquaculture information in addition to state/ODA data. Clarify shellfish growing areas — there are no oyster leases on private, port or county-owned lands.</p> <p>No support for controlling burrowing shrimp; recommend plan to "study and document species abundance and distribution... and explore environmentally-friendly means to manage populations." — continue to retain HAB-25 to control burrowing shrimp, but emphasize research aspect to determine appropriate control measures.</p> <p>HAB-28 Prevent Introduction and Control Exotic Species. ODA has lead on noxious plans; list as lead agency with ODFW — done.</p> <p>Add cooperative road use agreements for adjacent landowners as a way to reduce the amount of forest roads — added to SED-01.</p> <p>Better distinguish between agricultural control measures and farm management plans. Consider ways to strengthen SB1010. — Modified WAQ-01 to require specific agricultural pollution prevention and control measures (PCMs); modified WAQ-02. No specific language to influence SB1010 process.</p> <p>Strengthen local ordinances to reduce stormwater runoff from urban areas. Minimize impervious services and prioritize onsite retention and treatment of stormwater — included in WAQ-08 Step 4, modifications to SED-06.</p> <p>Add technical information to strengthen water temperature management strategies and add steps to conduct instream analyses and minimize impacts of water diversions, add cost info. — added WAQ-10 Step 4, costs; modifications to HAB-14, Ch. 8 cost tables.</p> <p>Strong support of listed priority actions — priority actions further developed in Chapter 1: Introduction and Chapter 8: Implementation and Finance.</p> <p>Recommend research to determine the effects of oyster populations on fish. Concern that non-native filter feeders may reduce food supply for salmon — specific concept not addressed; but oyster/eelgrass/burrowing shrimp research workplan outlined in Chapter 10: Monitoring Plan.</p>

Comment From...	Dated	Comments
Bob Pedersen, USDA/NRCS	10/12/98	Clarify RCWP funding, NRCS role and ASCS/Farm Services Agency roles — done. FSA contributed \$6+ mil to improve manure storage facilities and control runoff around livestock confinement areas — changed. Remove conservation tillage from erosion control methods listed in Farm Management Plan action — done. Reality check on CAFO Operators' farm plan completion and BMP implementation dates — changed.
Martha O. Pagel, Oregon Water Resources Department	10/15/98	Agency priorities defined by the Oregon Plan for Salmon and Watersheds (OPSW). Clarify link between OPSW and CCMP. — Linkage strengthened throughout the CCMP. Modified Chapter 3: Management Framework and specific OPSW related actions added to every CCMP action. Strengthened HAB-30 to set up a process for further collaboration. Action to ensure minimum streamflows accurately reflects Department's goals, objectives, and regulatory responsibility. — Made minor modifications to HAB-14 to clarify OWRD role and to integrate with temperature management strategies in WAQ-10. Add the Department as a partner in voluntary farm management plans. — Included in WAQ-02. Department unequipped to address the area extent of floodplains and the impact of flooding on the environment. — Department listed as partner in FLD-01, but not lead agency. Agency will participate in consultation over the short-term and long-term impacts of any watershed drainage modification projects. — Modified FLD-02; OWRD listed as a partner.
Tillamook County Creamery Association	Nov-98	Can support HAB-06 if it is voluntary, site-specific, and tailored to the individual landowner —no action needed. Do not support any action that takes pasture out of production (from purchase, lease, or easements) — all such actions would be site specific, and dependent on voluntary cooperation of landowners. References to specific buffer widths are not supported — buffer widths for farm land will be in individual voluntary farm plans. Land cost is annual cost-corrected — will be incorporated in final draft on per lineal foot of riparian area basis. Concern that extreme conservation actions (e.g., dike removal/breaching) may have deleterious impacts on adjacent farmland — any such actions would be studied carefully in advance, and dependent on landowner interest and cooperation. Support tide gate, culvert replacement if voluntary and site-specific — all are voluntary. Do not support additional CAFO inspector — failure to properly enforce existing regulations may lead to unnecessary tightening of restrictions because existing ones "aren't working." Shellfish growers not appropriate partner (WAQ-03) — changed (ODA had same comment). Do not support steps 5-8 in WAQ-04 — removed. Title of WAQ-05 is insulting — changed. Do not support recognizing good land stewards through Dairy Honor Program — removed.
Tillamook County Flood Control Group	Nov-98	Please add TCFCG as appropriate to "other partners, esp. in Flooding chapter — done. Important to include Biological Opinion and Finding of No Significant Impact in the CCMP — can't do now (needs to be on project by project basis); will better address ESA, FONSI and Biological Opinion throughout document, esp. Ch. 1, 2, 11.
Robert Miles, DMD, Bay City resident	11/12/98	Water Quality chapter does not address fecal contamination by recreational boaters and anglers on Bay and tributary streams. No studies to quantify contribution; no action plan developed. Recommends closing Bay and tributaries to salmon fishing when f.c. contamination closes shellfish harvesting. — While new TBNEP storm studies (Bower and Moore 1999) are distinguishing human from dairy and wild source bacteria, no way to distinguish human recreational contamination from failing septic systems. Recreational boaters and streambank anglers addressed in WAQ-09,
Chris Jarmer, Stimson Lumber	11/12/98	Correct relationship/representation of and between existing laws and programs — Oregon Plan fully referenced, FPA section beefed up, Forest Management Plan and HCP explained. Rights of private property owners and additional regulations — voluntary nature of Oregon Plan and other CCMP forestry actions underscored.

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James A. Cole, City of Bay City	11/12/98	<p>Editorial comments on support of Goal 5 — clarified to include cities, as well as County. Add City of Bay City to "Who" in HABs 15,16,17 — done. Construction site erosion control on 5000 sq ft projects — SED-06 requires runoff control on all urban construction/development sites.</p>
John Gettman Bay City resident	11/13/99	<p>Incorporated cities are not governed by county ordinances; each also has own comprehensive plan and development ordinances; but small cities lack financial resources and engineering expertise — changed and clarified throughout. Recommend that CCMP include plan to expand Bay City WTF and expand sewer network to Idaville area and Bay City UGB — up to Bay City to decide to do so first. Require chem toilet use on land development and construction sites, as well as recreational fishing boats — construction site sanitation in WAQ-08, second "floating head" in WAQ-09. Apply urban erosion control goal to all sites over 5,000 ft² by Sept. 99 — left at all urban sites at County's request. Likewise, SED-06 applies to all urban sites. Developing a stormwater ordinance (SED-06) is easy; who will pay for engineering sites and construction — costs added to WAQ-06, finances addressed in Table 8-2.</p>
	4/19/99	<p>Extensive use of acronyms makes document hard to read. We agree they're difficult, but they're a necessary evil in this subject matter. We've made the acronyms list the very last appendix for easy use, and developed an "Alphabet Soup" bookmark to include with the final books. Oregon Wetlands Joint Venture (OWJV, Farm Service Agency (FSA), Multispectral Scanner (MSS), Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), and Oregon Forest Practices Act (OFPA) aren't on acronyms list. Added, except for OFPA, which should have been listed as FPA. Can't find Oregon Forest Industries Council or Oregon Dairy Farmers Association on internet search. Are the references correct. Yes, they exist, and yes, they're appropriate partners for some actions. Provided OAR numbers for several Regulatory issues. Thanks for the help! HAB-08, who and what is the North Coast Ecosystem Workforce Initiative in Table 8-1? — Info added to Table 8-1. HAB-11, reference to SB 791 is inappropriate, as not signed by Governor. Removed reference. HAB-13, none of programs listed include payment for taking woodland out of production. Added reference as appropriate. Costs will be site-specific. HAB-14, who will take the lead for applying for grants from the Oregon Water Trust and/or the Bullitt Foundation? — Listed lead agency just makes it happen; agency heading the application will depend on the site. HAB-15, Questioned reference to SB 502; doesn't match bill titles in 1997 or 1999 legislatures. Bill number is correct; it's older than that. BLM and USFS own land in the Watershed, yet they and the USFWS and NMFS are not listed as Other Partners in 14 HAB, WAQ and COM actions. Added as appropriate, after review of actions and discussion with BLM representative. Provided list of federal agency OPSW actions which helped determine Other Partners listings. Included federal actions list in OPSW listing in Chapter 3.</p>
Ted Lorensen Oregon Department of Forestry, Salem	Many comments; some undated.	<p>Mr. Lorensen reviewed the document on several occasions and offered much constructive criticism as well as assistance with rewriting to bring actions into line with current forestry scientific information and the Oregon Plan for Salmon and Watersheds. He gave special attention to the Forest portion of Chapter 2, State of the Bay; and the Erosion and Sedimentation and Habitat Chapters. Some of the high points: Forestry practices, including length of rotation cycles, do not influence the hydrograph and flooding. Provided references. — Changed. Inherent conflict between some habitat goals and flooding goals. Adding large wood to the system will change (increase) flood heights and have other effects, such as migrating logjams, changing the watersheds hydrologic characteristics and probably increasing disruption to inhabited areas. Need to plan for and better accommodate those changes. — Added language about need to consider effects. Pointed out conflict between call for local ordinance protecting instream gravel and state DSL jurisdiction; state law precludes local jurisdictions from regulating either forestry or agriculture. — Changed as appropriate.</p>

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		<p>State Forest Lands Management Plan and HCP incorrectly described. — Incorporated his information.</p> <p>Rewrote sediment actions to combine 1,2,3,4,5 and 9 into SED-01, a comprehensive forestry roads action, and refocused others to accomplish desired goals, but from different angle, incorporating OPSW approach and actions. — Most suggestions incorporated; OPSW cross-referencing help especially helpful.</p> <p>Challenged objective calling for 75 percent shading of streams when deciduous trees have leaves as impossible to achieve anytime soon; maybe never on wider stretches. — Agree that objective not likely to be met; but we've got to try. DEQ calls for even higher shading in its TMDL standards.</p> <p>Need stronger connection between OPSW and CCMP. — Added list of applicable actions to Chapter 3, with detailed list in Appendix D. Each action in Action Plan is now cross-referenced to OPSW actions. Added promotion of OPSW instream and riparian restoration guidelines as appropriate, as well as explanatory references to specific OPSW objectives, actions, and monitoring in text.</p> <p>Need improved linkage between actions and outputs, as well as planned monitoring — beefed up monitoring portion of actions.</p> <p>Need to avoid value statements wherever possible. — tried our best to remove value statements.</p> <p>Need to recognize that different basins have different habitat potential. — Added language to chapter 2, pointing this out. Also, protection and enhancement actions are keyed to earlier characterization and prioritization processes.</p> <p>Provided information on ODF actions addressing six key factors for decline in salmonids, including fish passage problems, loss and modification of riparian, wetland, and estuarine and tidal habitat, loss of woody debris, and channel form changes. — Added to Chapter 2.</p> <p>Linkages to landowners weak — strengthened, with special effort to include federal and private landowners.</p> <p>Need to improve monitoring linkage with other efforts by agencies — done.</p> <p>Many of the assumed actions related to purchase of easements is highly speculative. Since this program, like OPSW, is voluntary, donations or purchases of land or easements will be necessary to fully carry out ideas. This is another reason on-the-ground enhancement costs are site-specific.</p> <p>Page 1-3. Need to revisit the idea that the magnitude and frequency of flood events has increased. — Can't be changed here, as this is the original problem statement adopted by the management committee. However, floods are discussed more from a human effects than climatological standpoint, and the frequency and magnitude of flooding problems has increased.</p> <p>Page 2-26. Should drop reference to low winter water temperatures threatening salmonids in some areas. — Dropped, because we will not be monitoring for low water temperatures.</p> <p>Page 4-1. Remove "severely" from goal statements. — Should not remove, as have been approved by Management Committee.</p> <p>HAB-01. Not practical or necessary to do Aquatic Inventory Surveys for all unsurveyed stream reaches — changed to "priority" unsurveyed reaches.</p> <p>Should combine HAB-03 and HAB-04, integrate into OPSW process — too late in process to combine actions; clarified and improved OPSW connections.</p> <p>Reminder that uplands by definition are not riparian areas — clarified use of term uplands (above 500 feet elevation) within this document.</p> <p>Re: HAB-07, Spawning habitat is not likely limited. — Yes it is, especially for coho and chum salmon.</p> <p>HAB-15, add reference to SB1010 — done.</p> <p>FLD-04. Note that 1975 FEMA maps did not have the better precipitation data generated by OSU in the 1990s — added reference to PRISM studies.</p>
Keith Mills and George Robison Oregon Department of Forestry	11/2/98	<p>No discussion of relative importance of sediment to the Bay nor historical context on sediment input and effect on the Bay — modified Chapter 2: State of the Bay, Erosion and Sedimentation priority problem.</p> <p>CCMP overlooks ecological consequences of sediment quality, routing, and storage. These may be more important than simple sediment loading. — Added action SED-02 Implement Practices That Will Improve Sediment Storage and Routing.</p> <p>Objected to implied weakness in enforcement of Forest Practices Act. Recommend emphasis on education and prevention rather than citations and civil penalties — modified SED-04.</p> <p>Confusion over using ESA HCP to expand riparian areas on state and/or private land. Point out that HCP used to minimize and mitigate take of primarily terrestrial species with little relevant to Tillamook Bay. Emphasize Forest Practices Act as the standards for riparian protection. — Dropped private HCP objective. Modified SED-02, SED-03, and WAQ-10 Step 4. Added to Chapter 11: Federal Consistency Review.</p> <p>Object to using riparian management areas as sediment control mechanisms. Point to road construction and timber harvest as most important landscape features to reduce sediment load to aquatic systems. Made major modifications to Chapter 6: Erosion and Sedimentation; rewrote SED-02 and SED-03.</p>

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Russell D. Peterson, US Fish and Wildlife Service	11/13/98	<p>Include overview of Management Conference, roles of subcommittees, and TBNEP process — added in Chapter 1: Introduction.</p> <p>Better link to Oregon Plan for Salmon and Watersheds (OPSW) — identified related OPSW actions for each CCMP action; strengthened HAB-30 to Support the Oregon Plan for Salmon and Watersheds — added agency OPSW responsibilities to Chapter 3: Management Framework).</p> <p>Provide context for choosing CCMP objectives — added descriptions to Priority Problems listed in Chapter 2: State of the Bay.</p> <p>Avoid using phrase "critical habitat" due to possible confusion with ESA terminology — changed to "key habitat" throughout.</p> <p>Include better monitoring objectives for flood chapter — strengthened.</p> <p>Use a "systems approach" to integrate flood and habitat issues for entire watershed — strengthened systems concept in FLD-01 to develop a comprehensive model and FLD-02 to implement watershed drainage modification projects.</p> <p>Avoid flood repairs that damage habitat. CCMP should include provisions to work with NRCS, COE, ODFW, USFWS and NMFS to identify in advance the areas or situations where hard constructed repairs would be made, bioengineering used, or alternatives to repair employed, in order to avoid habitat damage. Incorporated in final draft. — Partly addressed in FLD-02 Step 2. Wove in USFWS flood habitat study, here and in Ch 2 and 3.</p> <p>Broaden focus beyond salmon — changed text to reflect biodiversity throughout, but maintain priority of salmon and aquatic habitat; note Chapter 2: State of the Bay, habitat loss priority problem in Chapter 4. Other species will also benefit from cleaner water. Improved habitat.</p> <p>Eliminate objective to "Achieve an improved climate for fisheries practices and regulatory actions" — objective dropped.</p> <p>Avoid using HCPs for upland restoration targets. HCPs dropped as goals and/or objectives for upland forest riparian areas, most notably in Chapter 6: Erosion and Sedimentation.</p> <p>Riparian width standard too vague — modified healthy riparian condition definition in HAB-06; but did not use specific width requirement.</p> <p>Stronger enforcement of removal and fill law by DSL — related OPSW actions noted.</p> <p>Oppose control of burrowing shrimp due to environmental consequences — maintained HAB-25 to control burrowing shrimp; committed OSU Sea Grant Extension to determine appropriate methods for selected control.</p> <p>Support stronger regulatory tools by local governments — combined and modified HAB-15 and HAB-16 to revise local ordinances.</p> <p>Add technical criteria for stabilizing stream banks using alternatives to riprap — included in HAB-10.</p> <p>Object to action to maintain channel depths — Action HAB-29 dropped.</p> <p>In upland and lowland riparian areas add criteria for conservation easements — criteria considered too detailed and limiting to voluntary programs; not incorporated.</p> <p>Add technical criteria to identify significant wetlands and monitoring categories — included in HAB-08.</p> <p>Strengthen conservation measures to ensure minimum streamflows. Add provisions to identify and correct water diversions. Integrate low streamflows to high temperatures. — Modified HAB-14 and WAQ-10.</p> <p>Adopt "safe harbor" Goal 5 DLCD riparian buffer widths. — Rejected setting specific buffer widths, used healthy riparian condition standards.</p> <p>Add separate ordinances to protect wetland and eelgrass habitats — added tools and incentives for local government to protect estuarine habitat.</p> <p>Recommend that shellfish culture not occur in areas of native eelgrass. — Language strengthened in HAB-23 Step 3; rejected specific mandate to develop an ordinance for eelgrass beds, but HAB-15 allows process to protect key habitats.</p> <p>Develop an enforcement network to strictly enforce land use laws and ordinances — added in HAB-16.</p> <p>Expand scope of estuarine and tidal characterization to include more species — too ambitious; keep focus on salmonids and other fish, oysters, clams, benthic invertebrates, eelgrass and other aquatic resources. Defer to ODA for HCP.</p> <p>Add Si Simenstad's approach to prioritize tidal wetland restoration — included selection criteria, rankings and maps in Appendix.</p> <p>Do not distinguish new saltmarsh from existing saltmarsh in habitat restoration protection and restoration — HAB-20 and HAB-21 combined into a single action to protect and enhance tidal marsh.</p> <p>To protect eelgrass, work with Interagency Oyster Workgroup in addition to Pacific Coast Oyster Growers Association — specific name not included but modified text in HAB-20.</p> <p>Add technical criteria to modify ineffective tide gates and culverts — included in HAB-21.</p> <p>Articulate required NMFS consultation process for federal activities that may effect essential fish habitat — added in Chapter 11: Federal Consistency Review; modifications in Chapter 3: Management Framework, regulatory issues for HAB-29.</p> <p>Add other partners to essential fish habitat provisions — modified HAB-29, including DSL mandate.</p>

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		<p>Include Indices of Biological Integrity (IBIs) to monitor ecological integrity of the Bay — added research monitoring workplaces in Chapter 10: Monitoring.</p> <p>Add Coastal Wetland Conservation Grant, administered by USFWS, to Finance Chapter — included in Chapter 8: Implementation and Finance.</p> <p>CCMP should mention other ESA listed species, such as Oregon spotted frog. — HCPs address other listed species. This document cannot in space available. Other listed species should also benefit from cleaner water, improved habitat.</p> <p>Many objectives/measures of success too vague to be useful. Relate numbers of acres or miles to total as a percentage. — Done for final draft.</p> <p>Improve flooding section by taking a watershed systems approach. Look to USFWS Flood Systems Analysis Study, when available. — First draft referenced in final draft of CCMP.</p>
<p>Jenifer Robison, Oregon Division of State Lands</p>	<p>11/11/98</p>	<p>Confusion over essential fish habitat from (EFH) Pacific Management Fishery Council and essential salmonid habitat (ESH) from Division of State Lands. — Modified Chapter 3: Management Framework under Removal-Fill Permits; and HAB-29.</p> <p>COE and DSL wetland delineation techniques are the same — modified HAB-02.</p> <p>DSL removal-fill permits require revegetation of all disturbed areas by native woody species — added to HAB-06.</p> <p>DSL does not have regulatory authority to buy or sell saltmarsh or tidal marsh — modified Regulatory Issues in HAB-19.</p> <p>DSL does not have the expertise to control aquatic species such as burrowing shrimp — DSL dropped as Lead Agency, moved to Other Partners.</p> <p>DSL has neither the statutory authority nor equipment to maintain or restore channel depths — dropped action HAB-29 Maintain Channel Depths.</p> <p>DSL administers pass-through grant funds to local governments to complete local wetlands inventories under Goal 5. Also administers the Wetland Mitigation Banking Revolving Fund (WMBRF) which provides grants for wetland restoration and enhancement projects. — Added to Management Framework, Implementation and Finance.</p>
<p>Zach Schwartz People for Puget Sound</p>	<p>11/13/98</p>	<p>Reviewed draft CCMP and forwarded revised edition of the Snohomish Estuary Restoration Blueprint, a technical paper describing the model criteria for prioritization of restoration sites in the Estuary. — Added technical criteria to HAB-20, Protect and Restore Tidal Marsh. Tidal site ratings from Si Simenstad of UW are included in Appendix I. Will consider Schwartz' criteria next year in the process described in HAB-19, Prioritize Tidal Sites.</p>
<p>James E. McCauley, Oregon Forest Industries Council</p>	<p>11/16/98</p>	<p>CCMP does not accurately represent current or past conditions — worked with forestry people to improve both historical info and current scientific information.</p> <p>Opposed to requiring private landowners to follow HCP — removed private forest HCP objective.</p> <p>Include/acknowledge private landowner participation in ODFW fish enhancement projects — private forestry is included in Management Framework, mentioned in actions as appropriate.</p> <p>HABs-05&07 MOS cannot be reached by 2010 — can demonstrate progress.</p> <p>Questions regarding timber harvest as cause of landslides — changes reflect site characteristics, weather extremes, positive impacts of landslides.</p> <p>Recognize time and scale when discussing sedimentation — done.</p> <p>SEDs 01,02,03,04,05 adequately addressed by Oregon Plan MOU — actions combined, updated.</p> <p>Acknowledge FPA compliance rate — information not available.</p> <p>Support 1999 legislative package — too time-bound for this document.</p> <p>Acknowledge impacts of spit breaches and wildfires — included.</p> <p>WAQ 10,11 redundant and TMDL is the appropriate mechanism for standard attainment — changed to use TMDL to identify and prioritize.</p> <p>Concurs with ODF that forest activities cannot mitigate flooding — changed.</p> <p>CCMP should focus on preventing future catastrophic fires and preventing another breach of the spit — defer to ODF on fires; Bayocean Spit natural area zoning should help.</p>

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	3/11/99	<p>HAB-09 Limit Livestock Access to Streams: need to control access, not eliminate. ODA does not agree that complete restriction of livestock access to streams is necessary. — Changed throughout document.</p> <p>Change Step 2 to make OSU Extension lead in education outreach, with input from ODA — done.</p> <p>Step 3, Performance Partnership, not ODA, should be lead agency — done.</p> <p>Step 4, change to "all appropriate measures" instead of exclude livestock — changed per Management Committee 3/17 discussion.</p> <p>HAB-17 Strictly Enforce Laws and Regulations, change to "Pursue adding agency staff where enforcement gaps exist" — done.</p> <p>Step 2, ODA and other natural resource agencies will review research results... — Incorporated into changes, see Faudskar comments below.</p> <p>Page 6-3, suggested changing Water Quality objective to "By 2005, all appropriate measures will be implemented to contribute to achieving water temperature and riparian vegetation goals." — Consulted Management Committee 3/17. Unclear which objective he wished to substitute this for, so committee took no action.</p> <p>WAQ-03, Implement Revised Confined Animal Feeding Operation (CAFO) Inspection Procedure, adjust steps to reflect that ODA does not now have funds to hire additional CAFO inspector, do annual inspections at all CAFOs, or conduct aerial surveys, or authority to make unannounced inspections — done.</p> <p>WAQ-04, Use Farm-Specific Agronomic Rates for Nutrient Management, change Step 3 to read "Promote documentation of management practices..." — done.</p> <p>WAQ-05, Provide Farm Management Training Programs, change Step for to "Pursue mandatory education..." — done.</p> <p>Re: costs of sanitary survey, make annual time adjustable — done.</p> <p>Questioned use of term "pathogen" to refer to fecal coliform bacteria, as fecal coliform is a fecal pollution indicator, and may not reflect pathogen amounts. — DEQ uses term pathogens in its issue papers 1992-1994 Water Quality Review to cover more than just fecal coliform; left as is.</p> <p>Numerous small copy changes.</p>
Robin Downey. Pacific Coast Oyster Growers Association	12/7/98	<p>Categorizing oyster aquaculture and water pollution is misleading and inaccurate; acknowledge positive aspects of oyster aquaculture — Eelgrass action reworded to remove onus from oyster growers.</p> <p>Agree with importance of controlling invasive exotic species — no action needed.</p> <p>Strengthen linkage with TMDLs — done.</p> <p>USFWS comments regarding research, position, on oyster, eelgrass, burrowing shrimp interactions — eelgrass action reworded to emphasize applied research on interactions, shrimp control and eelgrass planting component in research plan.</p> <p>Aquaculture BMPs should be worked out by growers — work with shellfish orgs to develop BMPS.</p> <p>Don't completely disallow shellfish harvest in eelgrass — ODA to apply research results when planning new leases.</p> <p>Suggest outcome-based approach for restoration or preservation activities rather than disallowing activities altogether — while oyster habitat is valuable, it is not the same as eelgrass, and eelgrass needs to be protected.</p>
Dr. Frank Reckendorf. Reckendorf and Associates	12/9/98	<p>Address organic sediment contributions; Set targets for reduction of solid animal waste sediments and identification of unfenced areas. — Bacteria, nutrient, and sediment sources are addressed individually, elsewhere. Manure sediments also addressed in WAQ Improve Farm Management Practices goal and related actions, and SED Reduce the Adverse Impacts of Erosion and Sedimentation from Agricultural Areas goal and related actions.</p>
Chuck Mason, US Corps of Engineers	11/23/98 1/07/99	<p>Editorial changes to pp 4-1, 4-3, 4-4, 4-7, 4-8, 4-9 — done.</p> <p>Explain differences between dikes and levees in the Tillamook area — added to glossary..</p> <p>Additions to Federal Consistency Review — done.</p>

Comment From...	Dated	Comments
Northwest Region, Oregon Department of Environmental Quality	12/3/98	<p>SB1010 applies to all agricultural activity, not just animal waste runoff. — Chapter 1 reference broadened.</p> <p>Question reasoning for setting objectives for upland and lowland riparian restoration — modified Chapter 2: Priority Problems, adding GIS info on total miles, acreage, etc.</p> <p>Goals missing from flood section summary — added.</p> <p>Need list of native species — added appendix list compiled from NRCS and other sources.</p> <p>Passed the buck on defining riparian widths — did not define numerical width for riparian areas, used healthy riparian condition (HRC) standards.</p> <p>Clarify value of Bradbury approach and high priority listing of Wilson, Trask, and Kilchis — added references to HAB-03 for more information.</p> <p>For riparian protection and enhancement criteria, add water quality limited status — added text to step HAB-03 Step 3.</p> <p>Better distinguish between habitat protection and restoration — clarified in all actions.</p> <p>Clarify cost estimates for Corps of Engineers flooding model — details added to FLD-01.</p> <p>Provide examples and/or details of the types of drainage modification projects — specific project types listed in FLD-02.</p>
Bob Baumgartner Oregon Department of Environmental Quality	Undated Review of earlier draft received May 12, 1999.	<p>Numerous helpful copy edits — largely incorporated.</p> <p>Re Erosion and Sedimentation, second goal: Could we ID forest practices that reduce risk of debris flow that can be implemented or reviewed? — Chapter 2 discussion and SED-01, 02, and 03 expand on this. These three actions are based on OPSW work plans, which are keyed to monitoring and adaptive management. The goal descriptions are necessarily short.</p> <p>Suggests moving third goal to avoid presumption that it focuses only on forestry — Forestry isn't even mentioned in the description, and mention of features such as dikes and floodplain make it clear that focus is much broader.</p> <p>In last goal, what do we mean by solid waste organics? — Refers to natural riparian vegetation, cow bedding and feed, and yes, manure.</p> <p>In objectives, why not controlling erosion from all construction and development in urban areas until 2003 when ordinance developed by 2001? — Comments received too late to change an objective. Such erosion probably will be controlled before 2003, but this allows some implementation and awareness-building time.</p> <p>Add language to WAQ-08 aligning urban erosion control objective with DEQ/EPA program — done; also including in SED-06 regulatory issues.</p> <p>Re last goal, how will we measure sediment loads to rivers if we are to document a 25% reduction by 2010 — total suspended solids monitoring program described in Chapter 10.</p> <p>SED-01 costs: do ODF planners really make twice as much money as rangers? — Nope, corrected to \$50,000 each per year.</p> <p>SED-02: will the OPSW workplan be included as an appendix so that a description of ODF-8 and other actions is available? — Added to later drafts, added call-outs to copy as appropriate.</p> <p>In Step 4 of SED-02, need to explicitly state that site selection must ensure that 3water temperature is not increased, as ODF reports acknowledge impact to temperature if conversions not done correctly — changed, OK with ODF.</p> <p>Wonders why hardwood conversion is a sediment action — because conifers make better large wood for improving sediment sorting and routing.</p> <p>No plans for monitoring sediment in road runoff before and after improvement? — Added mention of ODF monitoring of forest practices, road and temperature protection BMPs under Oregon Plan.</p> <p>SED-03: why increased vegetation retention especially along <i>only</i> Type N streams? — reworded as requested to ...along streams, including Type N streams in especially high risk areas... OK with ODF.</p> <p>SED-05, step 5: are we referring to a general storm water permit? — No, ODOT says it's NPDES. Clarified.</p>

Comment From...	Dated	Comments
John Faudskar, OSU Sea Grant	12/14/98	<p>Clarify incomplete data regarding eelgrass on Page 1-9 – paragraph edited down to remove issue.</p> <p>Editorial suggestions to clarify/strengthen HAB-22 – largely incorporated.</p> <p>Suggested re-write for HAB-27 – Faudskar a partner in eventual rewrite.</p> <p>HAB-28 costs too narrow, focused on shellfish growers – costs broadened to include all estuary users.</p> <p>Errors in Table 3.1 – new data on shellfishing closures due to bacteria levels requested.</p> <p>Clarify WAQ-04 to farm-specific agronomic rates – done.</p> <p>OSU is not appropriate "who" for WAQ-05 step regarding mandatory training for farmers who violate water quality standards – shifted to ODA.</p> <p>Remove critical habitat reference/editorial suggestions for WAQ-12 – done.</p> <p>Related actions for WAQ-13 – corrected.</p>
Christine Valentine, Oregon Department of Land Conservation and Development	1/4/99	<p>DLCD will not conduct a federal consistency review until the CCMP contains sufficient detail to allow the Department to determine compliance with the local and state policies of the Oregon Coastal Management Program (OCMP). Sending final draft to DLCD as part of formal review process.</p> <p>The Department found no major inconsistencies with the general goals and objectives of the CCMP. DLCD will participate in the TCPP.</p>
Darrell Brown EPA Office of Wetlands, Oceans, and Watersheds	Jan. 19, 1999	<p>Comments focused on financing and implementation, underscoring the need for local financial support for the CCMP's implementation.</p> <p>Need more specifics on Tillamook County Performance Partnership staff duties, organization structure, function, and priorities. -- Added details to Chapter 8, along with PP Bylaws as Appendix L.</p> <p>How will implementation be tracked? -- Added monitoring and objective tracking information to each action, as well as information in Chapter 8 on planned real-time progress reporting and data accessibility.</p> <p>What is CCMP Finance Strategy? Need source of funds with regard to the action plans. --Chapter 8 includes table detailing possible sources of funds, and indicating which actions are already funded through specific initiatives, or through coordinated plans such as the Oregon Plan for Salmon and Watersheds, or the Northwest Forest Plan. Actions themselves include funding information, and are now cross-referenced to the OPSW.</p> <p>Implementation Plan needs info on how the public will continue to be involved. -- Added info on Stewardship Council and Watershed Council roles and representation. Watershed Council Coordinator will do outreach work for TCPP.</p> <p>Need summary of Action Plan Development Projects (APDPs) and a Bibliography of Publications. -- Added APDP report (Appendix J) and list of TBNEP publications (Appendix M). Chapter 2, State of the Bay, includes a bibliography of many relevant publications and Actions are footnoted as needed.</p> <p>Should move Management Conference members and their affiliations up front in the document. -- Done.</p> <p>Should summarize info in the Environmental Characterization Report, stating priority problems; environmental quality goals and objectives; status and trends of the estuary's water quality, natural resources, and uses; probable causes of problems; and linkage between pollutant loadings and changes in the estuary's water quality, uses, and natural resources. -- Done in Chapter 2, State of the Bay.</p> <p>Finance strategy must be developed to outline how CCMP implementation will be funded as required under Section 320 of Clean Water Act, including source of funds (entity, FCDA number, program objectives, funding eligibility, available funds, etc) and mechanism for funding. -- Developed program descriptions in Chapter 8, as well as funding tables, sorted by both funding source and specific action.</p> <p>Need to seek and detail local funding sources. -- Information added to funding table and program descriptions.</p> <p>Need details on TCPP focus and plans. -- Much detail added to Chapter 8.</p> <p>Need an implementation agreement between the EPA, the NEP, and the Partnership members to spell out roles and responsibilities. -- Implementation Agreement signed and added as Appendix K.</p> <p>Need to spell out how the Partnership will coordinate the CCMP with the other regional plans, such as the Unified Watershed Assessment for</p>

Comment From...	Dated	Comments
		<p>Oregon, OPSW, Northwest State Forest Management Plan, SB 1010, County Flood Hazard Mitigation Plan, etc. -- Other plans are discussed in Chapter 3; and discussed and cross-referenced in Actions. Developers and implementers of these plans were closely involved in creating the CCMP, and they will be at the table through the Stewardship Council and Watershed Council, as explained in Chapter 8.</p> <p>How will PP inform agencies and private interests of the responsibilities under the plan, track those commitments, promote interagency cooperation, and advocate for the program? -- Added info to Chapter 8, Implementation, and Chapter 11, Federal Consistency Report.</p> <p>How will public link PP with NEP? Encouraged name change to include Tillamook or Estuary in the name. -- Name now Tillamook County Performance Partnership. Phone answering routine includes "NEP." NEP logo and credit continue in publications, etc.</p> <p>Monitoring plan needs defined environmental goals and indicators; inventory of current environmental monitoring programs in the watershed to coordinate future efforts and ID gaps; specific collection methods, locations, and frequencies; and data management system and statistical methods for analysis. -- Beefed up Chapter 10: Monitoring and Research Needs.</p> <p>Which entity within the PP will maintain data and develop Information Management System? When and how, who will pay for it, and how can people can access the data? Who will communication monitoring results to the public? -- Information added.</p> <p>Accountability system and progress report will be helpful at biennial review time. Would like a matrix, with actions, responsible parties, and milestones for tracking progress and reporting to the public. -- Plan a report similar to San Francisco Bay's (sample page included in Chapter 8).</p> <p>Federal Consistency Report needed, with inventory of applicable federal programs and an evaluation/discussion of inconsistencies and remedies to resolve inconsistencies, as well as a review strategy. -- Added process and details to Chapter 11, Federal Consistency Report.</p> <p>Action Plans need to state the priority problem; state related program goals; set specific objectives to attain goals; identify possible ways to meet those goals; and identify the actions that will be taken to meet those goals. -- Clarified priority problem, goal, and objective statements; and improved organization to underscore relationships. Referenced objectives within each Action. Made sure all objectives were measurable, to facilitate tracking/monitoring.</p> <p>Actions plans need specifics of who will head effort; who will do what step; when and where; how much it will cost. Also need to identify regulatory concerns and funding sources. -- Done.</p> <p>More emphasis on how actions will bring about measurable change, rather than simple implementation monitoring. -- Clarified linkages with monitoring plan and measurable objectives.</p> <p>How will PP keep stakeholders involved during plan implementation? Will there be a public summary document or other documents to inform public? Also need to summarize public comments received on the draft plan and responses given. -- CCMP will be highlighted by a more a public-friendly Executive Summary. Public comments and responses are included in Reviewer Comments, Appendix P?</p> <p>CCMP also needs Oregon State Coastal Program review to determine if consistent with their program. -- Have received letter of response from DLCD; to be included with CCMP.</p> <p>National Marine Fisheries Service and U.S. Fish and Wildlife Service must also review CCMP with respect to Section 7 of ESA. -- Have letter from USFWS stating that can't determine need now; must be done on project-by-project basis, when details are available.</p> <p>State Historic Preservation Officer must also review the final CCMP to determine if its implementation will adversely affect historic properties. -- Received letter; will attach.</p> <p>Need executive summary which sets stage for discussions and actions in CCMP as well as call for action among implementers to carry out their responsibilities. Also need Introduction chapter to discuss physical setting, map of the watershed, goals and objectives, priority problems, priority action plans, State of the Bay Summary, etc. -- Chapter 1, Introduction, leads reader through the document, describes the CCMP development process, lists and discusses goals and objectives, and lists priority action plans. Chapter 2, State of the Bay, summarizes environmental characterization, priority problems, status and trends, and lists goals and objectives as well as action plans.</p> <p>Explain how priority action lists were developed. -- Development of Citizens High Priority Actions list and CCMP Priority Actions are now fully explained in Chapter 1.</p>

Comment From...	Dated	Comments
Nancy Laurson EPA Office of Wetlands Oceans and Watersheds Oceans and coastal Protection Division Coastal Management Branch		Provided detailed, page-by-page comments on the CCMP and assisted on numerous occasions with advice, suggestions for improving the plan, alternatives for meeting EPA requirements, and examples of other projects' approach.
John Gabrielson National Estuary Program Coordinator EPA Region 10		Attended and actively participated in Management Conference meetings; provided detailed comments on the CCMP as well as advice and suggestions, actively collaborated with TBNEP staff and others in writing mutually-acceptable Action Plans that accommodated applicable laws, mandates, and stakeholder concerns. Especially helpful with Chapter 5: Water Quality; Chapter 6: Erosion and Sedimentation; and Chapter 8: Implementation and Finance; Chapter 11: Federal Consistency.
Troy Downing OSU Extension	2/11/99	Reviewed WAQ-05 Provide Farm/Livestock Management Training Programs. Raised several questions — items clarified or removed. Objected to publishing names of participants in classes that he teaches — changed to publicize farms whose personnel are training, rather than individual names. Educational materials already available — moved timetable forward. Decreasing trend in permit violations unlikely, since real enforcement of storage and application rules will likely bring 3-5 year increase in violations — removed measure of success, keyed instead to SB 1010 compliance by 2010.
Mike Powers Oregon Dept of Agriculture	2/24/99	Offered anticipated costs for tree planting, fence building, water lines, etc., to be rechecked with Eric Mallery — got latest from Eric, included in Final Draft on per lineal foot of riparian area basis. Clarified Water Quality Farm Plans are voluntary, SB 1010 is regulatory — corrected WAQ actions as needed. Remember only ODA can require anything regarding ag practices and water quality. NRCS has no enforcement authority — corrected as needed. WAQ-04, if including soil testing in farm plans, need to add ODA and SWCD to Step 2 — done. Re WAQ-05, Step 4: Additional monitoring and inspection will likely bring increase in violations at first; then decrease in violations — stretched time for decreasing trend in violations to 10 years.
Mitch Cummings NRCS, Tillamook	3/2/99	Numerous small edits — changes made. HAB-09: Restricting all livestock from streams by 2005 a tall order, with many horse farms and small beef operations around. Need to qualify: at last 80% of livestock restricted by 2005 — changed per Management Comm. discussion 3/17/99. Clarified HAB-10 language on minimizing use of riprap, added NRCS as a lead agency, adjusted costs and scope to reflect 200 projects instead of 50. — done. HAB-20: NRCS doesn't arrange tidal marsh sales/easements — corrected. HAB-21: NRCS not involved in exotic/invasive species control — corrected. WAQ-02: Farm Management Plans not for all rural owners, only those with livestock — clarified. Corrected information about Farm Bill and its programs in Chapter 8: Implementation and Finance — done.

Comment From...	Dated	Comments
Vic Affolter Tillamook County Dept of Community Development	3/10/99	Copy edits to p. II; p. 1-3 clarify T.C. Comprehensive Plan; p. 2-29 clarify shoreline sanitation surveys; p. 2-35 and 1-14 change flooding objectives to increase number of houses to be raised to 60 by year 2000, decrease number of cow pads to be built from 18 to 8; p. 3-7 clarify Tillamook County land use ordinance coverage and enforcement; p. 3-23 under Opportunities for Improvement, restate Enforcement of land use laws: Water quality and salmonid habitats will benefit substantially from improved enforcement of land use regulations; change title of FLD-07 to Regulate New Construction and Development in the Floodplain; reword SED-10 to "Require effective construction site erosion control on all urban construction sites in all Tillamook Bay Watershed Jurisdictions," removing 5,000 ft ² or larger criterion, add continuing implementation costs under Anticipated Costs. — All changes made as requested.
John Faudskar OSU Extension Service	3/10/99	Numerous small copy edits and corrections — changes made. Requested list of appendices in front table of contents — done. P 1-3, why restoring healthy wild salmonid populations? — Subbed OPSW mission statement. Add WAQ-06 through 09 to priority actions list — reworked priority actions list. Page 1-9, don't limit habitat concern to salmonids — broadened to include other species. P. 1-13, proposed revised eelgrass objective — Management Committee revised objective wording 3/17. P. 1-14 proposed new objective addressing urban stormwater runoff — Management Comm. reworded existing urban erosion objective instead 3/17. P. 2-7 DLCD Goal 16 management units and shellfish growing area classifications are not related. — shellfish discussion moved to water quality section. P. 4-47, rewrote HAB-21, Protect and Enhance Eelgrass Habitats, clarifying value of eelgrass and broadening focus beyond oyster growers to include other estuary users — rewrite adopted. P. 4-57, remove landed values figures for oysters and clams from HAB-26 Control Burrowing Shrimp Populations discussion, adjust step implementation dates — done. P. 4-59, just control high-risk exotic species, can't eradicate; add OSU Extension as Other Partner — done. P. 9-9, education entity is OSU Extension Service, not just Sea Grant — changed.
Susan Chase Oregon Dept. of Transportation	3/15/99	Review of latest erosion and sedimentation chapter. First goal on second page: how do road and building construction sites create excess erosion? May want to clarify that construction sites without adequate erosion control may create excess erosion. Only the rain on unprotected exposed soil creates the erosion. — Changed.
	3/8/99	Reviewed SED-09, Survey Non-Forest Management Roads. ODOT owns and maintains about 145 center land miles, while Tillamook County owns and maintains 336 center lane miles, therefore County should be lead agency, rather than ODOT. — Changed, included mileage info. Listed actions ODOT has developed to handle sediment concerns — included in Action steps and Regulatory Issues as appropriate.
Mark Gervasi City of Tillamook	5-8-99	Assisted with clarifications to WAQ-07, Expand Sewer Network.
	5-20-99	Reviewed WAQ-07, with following changes: Step 2: Specify that City will procure funding for expansions as funding sources become available. Changed. Step 4: Clarify that city will require failing OSDs to connect to sewer system as per state law. Changed.
Jesse Hayes Hayes Oyster Co.	3/10/99	Numerous small copy edits and corrections — changes made. General concern that bacterial contamination of water — especially as relates to agricultural practices — not receiving high enough priority in document: not listed first among priority problems, not listed first among High Priority Goals and Actions listed on Page 1-7, not discussed first among the priority problem chapters. Response: While bacterial contamination was listed first in some places in the nomination packet, it wasn't stated as the top priority problem. Key Habitat is treated first in this document because many key habitat problems and actions affect the other priority problems, particularly water quality. The High Priority Goals and Actions — which were not and are not listed in order of priority — have been reworked. The Clean Water Act focus of the NEP and this CCMP has been clarified and emphasized, and the chapters and problem statements were re-ordered to present water quality before erosion and flooding.

Comment From...	Dated	Comments
	3/22/99	<p>P. 1-13, sought rewrite of erosion and sedimentation goals and objectives to include agriculture, as well as developed areas. — Agriculture is development. Linked instead to Habitat objectives addressing riparian, wetland, and instream habitat, and suspended sediment concentrations.</p> <p>P. 4-47, offered rewrite of HAB-21 Protect and Enhance Eelgrass, based on discussion at 2/99 Management Committee meeting. — Similar to John Faudskar rewrite, see above.</p> <p>P. 4-59, HAB-27 Prevent Introduction and Control Exotic Species, need to say prevent introduction in copy too — done</p> <p>List Chinese mitten crab among invasive species — not added, list not exhaustive</p> <p>Clarify "Greater controls on oyster growers — done.</p> <p>P. 6-11, Prioritize CAFO inspections to target areas, not subareas — done.</p> <p>P. 10-35 Ecological Interactions Among Eelgrass, Oysters, and Burrowing Shrimp study, clarify meaning of "forcing factors," negative impacts on eelgrass are from certain oyster culture methods, not oyster culture itself — done.</p> <p>States that bacterial contamination is the number one problem, quoting from discussion of the Rural Clean Water Program and agriculture on page 4-7 of the Nomination of Tillamook Bay to the NEP. Concerned that bacterial contamination not given high enough priority in CCMP. — Changes were made to move bacterial contamination forward in the CCMP, but the Nomination does not state that this is the Bay's number one problem, and the goals listed in the CCMP are not listed in order of priority. See discussion above. Mr. Hayes' concerns were addressed in March 17 Draft.</p>
Eric Mallery SWCD	3/10	<p>P. 2-20, under habitat goals and objectives, remove "continuous" from Enhance 500 miles of ... riparian habitat in the 0-500' elevation band to healthy condition by 2010 — done.</p> <p>Page 4-2, should include culverts in objective "Upgrade 50% of all tide gates..." — Change not made because we don't know where all culverts are, or which pose problems.</p> <p>P. 4-16, provided per-lineal foot cost estimates for fencing, water line, planting, and off-stream watering devices — incorporated in final as average costs per lineal foot of riparian area.</p> <p>P. 4-23, HAB-09, Limit Livestock Access to Streams, 2005 not realistic completion date for restricting all livestock from streams, suggests 2010 instead — based on 3/17 Management Committee discussion, was changed to 80 percent of priority riparian areas by 2010.</p> <p>P. 4-29, HAB-12, Sponsor a Native Vegetation Planting Day, notes that SWCD and Watershed Councils are already running planting projects with public involved — 2000 date removed.</p> <p>P. 4-39, HAB-17 Strictly Enforce Laws and Regulations, suggests that fines for riparian area violations go to fund riparian projects — good idea.</p> <p>P. 4-63, HAB-29 Evaluate Commercial and Sport Fishing Practices, remove word "harassment" to say "Mortality due to commercial and sports fishing is another source of decline in fish populations" — done.</p> <p>Add PFMC to Other Partners — done.</p>
Dagmar Barsch Cope Meares property owner	4/1/99	<p>Concerned that not enough attention paid to zoning of Bayocean Spit, which she hopes to see rezoned to Recreational Natural. Any development in this fragile environment might lead to a disaster. Without the spit there is no bay.</p> <p>— Rezoning of Bayocean Spit was inadvertently removed from some drafts of CCMP; restored to HAB-23.</p>
Brent Seaholm Oregon State Police	4/2/99	<p>Changes to HAB-27 Effectively Enforce Fishing Regulations. Laws are not more restrictive than they need to be to accommodate a relatively small number of serious problem fishermen. Regulations aim to promote a viable fishery while ensuring sustainable populations. Also change Step 1 to reflect current efforts at educating anglers, including volunteers, handouts, and color posters. — Made requested changes.</p>
Bob Baumgartner Department of Environmental Quality	3/12/99	<p>Sedimentation goal on 1-1 is different from one on 2-1. Which is right? — Added paragraph explaining difference.</p> <p>Questioned 1-5 mention of source data or findings for bacteria — added reference to Sullivan <i>et al</i> 1998 results of storm sampling.</p> <p>P 1-8, delete word "agricultural" to broaden pollution control measures goal — good idea, done.</p> <p>P 1-9 Erosion and sedimentation discussion needs improvements, citation — rewritten.</p> <p>P 1-10 Need reference to septic tanks and urban runoff — done.</p> <p>P 1-12 What will role of DEQ be in Stronger Enforcement and Better Management? — Added.</p> <p>P 2-21 Sedimentation rate is not the same as sediment levels — corrected.</p>

Comment From...	Dated	Comments
		<p>P 2-25 Slight changes to water quality priority problem statement regarding DO, suspended solids, and toxics — changed.</p> <p>P 2-29 Better match septic tank inspection program to data coming from Bower and Moore — improved.</p> <p>HAB-03, 04, 05, 06, 14: add DEQ water temperature monitoring and TMDL role — done.</p> <p>HAB-10: in Step 1, should also prioritize projects based on water quality values — changed.</p> <p>HAB-15: SB 502 gives primary, not sole, authority to ODA to regulate farming practices for the purposes of protecting water quality — changed.</p> <p>WAQ-01: DEQ another partner in PCM effort — added.</p> <p>WAQ-08: Remove non-point from title. Done.</p> <p>FLD-08: add Fire Marshal, hazardous waste generators to Other Partners. Done.</p> <p>Monitoring chapter: Additions to Temperature Monitoring and Nutrient Monitoring programs — changes made.</p> <p>Federal Consistency: Clarify DEQ role in administering federal programs and mandates, p 11-3 — done.</p> <p>Many small clarifications and corrections — made.</p>
Jean and Robert Fitzgerald, Cape Meares	4/18/99	Approve inclusion of Bayocean Spit as an area of high priority for protection. Rezoning to Recreation Natural will be a key element in its protection and allow it to remain an effective boundary for a large portion of Tillamook Bay. — Action HAB-23, Update the Estuary Plan and Zoning, requests that the County rezone Bayocean Spit.
Gloria Languedoc Cape Meares	4/18/99	Concerned that rezoning Bayocean Spit is not on the priority list of actions. — The process for determining the priority list is detailed on Page 1-14. We expect to implement every action; not just those on the priority list.
Margaret Tweelinckx Cape Meares Member of Audubon, Oregon Field Ornithologists, Oregon Shores Conservation Coalition	4/22/99	Endorsed rezoning of Bayocean Spit to Recreation Natural and protection for the Three Graces Intertidal area as an important priority. — These are included in Action HAB-23. The process for determining the priority list is detailed on Page 1-14. While Action HAB-23 is not on the Priority List, we expect to implement every action.
Katrina Symons BLM	4/26/99	Please add BLM as an "Other Partner" to actions HAB-01, HAB-02, HAB-03, HAB-05, HAB-07, HAB-10, HAB-16, HAB-26, SED-01, QAQ-10, WAQ-11. — Done. Also discussed BLM's role in other actions with her and reworded and added Other Partners listing where appropriate. Federal agencies are credited for their role in the Oregon Plan with a listing in Chapter 3, Management Framework