



# STATE OF IDAHO

## DEPARTMENT OF HEALTH AND WELFARE

DIVISION OF ENVIRONMENT  
Statehouse  
Boise, Idaho 83720

September 4, 1980

Jack Jensen, Chairman  
Butte Soil Conservation District  
P.O. Box "S"  
Arco, ID 83213

Dear Mr. ~~Jensen~~ *Togla*:

I am pleased to inform you that the U.S. Environmental Protection Agency, Region X - Seattle, has decided that the Butte Soil Conservation District's 208 project proposal (attached) for the Big Lost River Water Quality Improvement (increase) is "Possibly Fundable", whatever that means. Attached for your information and review is the letter we received from EPA-Region X, which indicates two funding categories "Fundable and Possibly Fundable". I am considering these arbitrary categories as fundable projects. Therefore, I encourage you to develop a draft work plan and address the concerns presented in the "Project Specific Comments" section of the attached letter. If you will notice, your project proposal received the most detailed set of comments of all the projects which are being considered for funding, and that some of the concerns of EPA-Seattle are already addressed in the prior approved work plan. I encourage you to point this out where possible in your amended work plan for this additional funding.

The draft work plan has to be to EPA-Seattle by November 1, 1980 at the latest and may be submitted anytime prior to that date. As before, please submit the draft work plan through my office.

If Gordon Hopson or I can be of any assistance, please do not hesitate to contact us.

Sincerely,

Donald M. Martin  
Sr. Water Resource Analyst

DMM/nc

Attachment

cc: Gordon Hopson, DOE-Pocatello  
Terry Keyes, DOE-Boise  
Steve Provant, EPA-Id. Op. Office

## IDAHO 208 WATER QUALITY MANAGEMENT PROGRAMS

PROJECT PROPOSALPROJECT NAME

Big Lost River Water Quality Improvement - Additional Planning and Demonstration Tasks

1. PROBLEM DESCRIPTION

The scope of the initial work plan did not include several key tasks both in the planning and demonstration aspects of the project. Therefore, existing project funds are inadequate to insure the success of the water pollution abatement efforts of the project. The Technical Advisory Committee (TAC) for the project recently recommended several additional tasks to be included in the scope of the project. The TAC, which is comprised of all agencies that manage or regulate activities within the project watershed are strongly supportive of the project and the additional tasks. A number of these agencies are actually demonstrating different management practices (structural and nonstructural) within the project area with their own funds. The basic reason for these additional tasks is the magnitude of the project was not realized during the development of the initial work plan.

2. PROJECT OBJECTIVES

The purpose of these additional tasks is to insure the integrity and credibility of the abatement plan and demonstration projects.

3. PROJECT TASKS

- a. An evaluation of the sedimentation rates and loss of storage capacity in Mackay Reservoir. This is needed and would be a valuable benefit to the project.
- b. Equipment needs that cannot totally be furnished by the landowners. Such as large trucks with the capacity to handle rock materials for the gabions and a dragline for sloping the steep banks to a manageable slope for revegetation. This additional money would help cover rental costs and/or help defray fuel costs.
- c. Complete environmental assessment preparation.
- d. Additional in-depth plan preparation. See attached 208 outline.
- e. Public participation responsiveness summary.
- f. Due to inflation, costs of materials have increased and are soon to increase again. Therefore, original estimated costs were not adequate.

Project Proposal  
Page 2

- g. Additional stabilization of approaches to head wall gabions in order to protect and maintain meander nodes. This is needed to prevent the creation of ox'bows and maintain key meanders.

4. PROJECT OUTPUTS

- a. Determination of the improvements in water quality (sediment removal) and its associated effects on Mackay Reservoir.
- b. Successful construction of the demonstration structures by the involved landowners.
- c. Comprehensive environmental assessment.
- d. Improved public participation program.

5. PROJECT SCHEDULE

Task a July 1980 - July 1981  
Task b August - October 1980  
Task c January - September 1981  
Task d July 1980 - September 1981  
Task e January - August 1981  
Task f July 1980 - August 1981  
Task g August - October 1980

6. PROJECT COSTS

Butte Soil Conservation District -	12,500
EPA	<u>50,000</u>
TOTAL	\$62,500

7. RESPONSIBLE AGENCY

Butte Soil Conservation District

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

RECEIVED

AUG 20 1980

DHW - Div. of Environment



REPLY TO: M/S 441  
ATTN OF:

AUG 15 1980

Dr. Lee W. Stokes  
Administrator  
Division of Environment  
Department of Health & Welfare  
Statehouse  
Boise, Idaho 83720

Dear Dr. Stokes:

We have reviewed the 208 project proposals submitted in your draft State/EPA Agreement. Proposals which we consider to be fundable or possibly fundable with FY 1981 208 funds are listed below:

Fundable Projects

1. Idaho Association of Conservation Districts Funding Project
2. Agricultural Planning for Implementation
3. Ada County Urban Drainage
4. Groundwater Pollution Training for Health District Staff

Possibly Fundable Projects

1. Coeur d'Alene River and Tributaries Master Plan
2. Big Lost River Streambank Erosion (increase)
3. Agriculture Related Sediment in Silver Creek
4. Additional Public Participation for Kootenai County Lakes Master Plan

The project proposals listed in the draft State/EPA Agreement which do not appear as fundable or possibly fundable received low priority in our Regional review of all FY 1981 208 project proposals. However, we are still open to negotiation on all proposed projects, if you feel there are exceptional circumstances which we should take into consideration.

Please understand that final commitment of funds will not be made for any project until an acceptable work plan has been approved by EPA. Work plan guidance is enclosed as are comments specific to each of the projects in the two categories. As in the past, "hard outputs" are a requirement for all work plans.

I would suggest that work be initiated immediately on development of work plans for all fundable projects for which you feel the work plan guidance and special stipulations in the enclosed comments can be satisfied. Selectively, you might wish to move ahead with work plan development for possibly fundable projects also, since there is a possibility of priority adjustments as we reach final funding decisions.

It is our intention this year to award all FY 1981 208 grants by January 30, 1981. To meet this schedule we must receive draft work plans by November 1, 1980.

Appropriate modifications to the draft State/EPA Agreement should be made to reflect this narrowing of potential 208 projects.

We look forward to working with you in the development of this new round of projects.

Sincerely,



Robert S. Burd  
Director, Water Division

Enclosures

cc: Lynn McKee, Dir., ID Opns. Ofc.

## PROJECT SPECIFIC COMMENTS

### Fundable

1. IASCD Funding Project. This project was partially funded in May 1980 with FY 1980 208 funds, and the work plan was approved at that time. FY 1981 funding can be applied to make up the difference necessary to fully fund this project at the level defined in the work plan. We will amend the current grant accordingly upon receipt of (a) a signed grant amendment request from Idaho, (b) a brief report describing progress to date under the IASCD funding project with an updated schedule of activities for the remainder of the project, and (c) advice of allowance for FY 1981 208 funds from EPA Headquarters.

2. Agricultural Planning for Implementation. The draft State/EPA Agreement requests funding for three priority agricultural pollution areas: Hangman Creek, Lower Boise, and Willow Creek. We concur with these proposals subject to the stipulations mentioned below. Subsequent discussions with our Idaho Operations Office indicate that IDHW-DOE is also interested in beginning a similar agricultural pollution control effort for Vineyard Creek. We will consider funding for Vineyard Creek, but IDHW-DOE must explain how 208 funds previously awarded to Rock Creek will be used now that Rock Creek has been selected for RCWP funding.

For all four proposed project areas, the work plans must explain what sources of funds will be used to implement BMPs. If the intended source is the revised State cost-share program (authorized under S.B. 1404), then the work plans must include (a) a commitment from the agency administering this funding program to fund implementation of BMPs identified in the project areas on a priority basis, and (b) a project output for obtaining funds to implement BMPs on the high priority sites within the project areas during the grant period. Also, the work plan should include a commitment from ASCS to fund high priority, non-structural and management type BMPs in at least two of the project areas through the "ACP Special Project" program.

3. Ada County Urban Drainage Project. We support this project on condition that the grant results in adopted drainage/water quality controls including specific design criteria, enabling legislation, necessary ordinances, financing, and institutional arrangements to implement a consistent and effective runoff control program. The hard output commitments must be firm and clear in the work plan.

4. Groundwater Pollution Training for Health District Staff. The concept paper for this proposal is generally acceptable.

### Possibly Fundable

5. Coeur d'Alene River and Tributaries Master Plan. We concur with the need for this project; however, since we are currently funding similar efforts by two other counties in the Panhandle area, the proposal received lower priority. Nevertheless, we encourage you to prepare a work plan for this project containing firm commitments to implement hard outputs during the project period.

6. Big Lost River Streambank Erosion (increase). Much of the work to be carried out under this proposed increase was requested by EPA as part of the

original Big Lost River Streambank Erosion work plan. We agree that this work appears to be needed. However, we have serious doubts about whether the overall Big Lost River project will bring about a firm and effective watershed management program with commitments to implement needed watershed treatment measures as well as locally financed non-structural erosion controls. The priority of this project can be raised if the work plan includes the following:

- a. Commitments from BLM and USFS to prepare and implement watershed management and improvement plans. The commitments should be to (1) prepare the plans in cooperation with conservation district and landowners, (2) seek implementation funds for non-management type BMPs (seeding, planting, fertilizing, etc.) and (3) proceed with implementation of management type BMPs (grazing controls, rotations, reduced tree harvesting, etc.).
- b. Some type of commitment from the irrigation district to (1) identify the benefits they will realize from reduced sedimentation problems in Mackay Reservoir, and (2) financially support implementation of streambank erosion controls. The irrigation district gave verbal commitments to provide equipment and manpower. The work plan should explain what manpower and equipment the irrigation district has provided for the project so far and why additional equipment needs should be supported with 208 grant funds rather than by local contribution, as indicated in the original work plan.
- c. Commitment that vegetative and other non-structural measures, such as land use changes, setbacks, etc., will be used on streambanks.
- d. A program to ensure maintenance of installed practices.
- e. Designation of a management agency to carry out the plan.

7. Agriculture Related Sediment in Silver Creek. This project is primarily an R&D effort and received low priority for funding. However, because of the nature of the proposed demonstration (i.e., a well controlled study of the cause and effect relationship between agricultural practices and trout habitat) it has been given more favorable consideration than most R&D proposals. Funding for this project is possible if the project will result in establishment of a binding agricultural BMP implementation program for Silver Creek.

8. Additional Public Participation for Kootenai County Lakes Master Plan. The sole purpose of this proposed increase to the current Kootenai County project is to develop public participation materials. The concept paper does not explain why these additional funds for public participation materials are essential for successful completion of the project. Due to the low priority of this project, 208 funding this year is highly unlikely.

## Work Plans for WQM Planning Grants

All WQM planning grant applications require work plans as documents to control and direct grant funded WQM planning activities. The general requirement for work plans (sometimes referred to as "project control programs") is presented in 40 CFR 35.220, and additional detail appears in 40 CFR 130.10, 40 CFR 35.1511 (proposed), and in the Revised Grant Application and Work Plan Handbook. This memo incorporates regulatory and policy directives, and sets forth the minimum requirements for WQM planning grant work plans.

The basic work plan requirements are set forth below in two sections: concept paper requirements and final work plan requirements. Together, these two lists define the overall work plan requirements for any WQM grant. The concept paper requirements must be completed by the applicant and approved by EPA prior to grant award. The final work plan requirements must be completed by the grantee and approved by EPA within 90 days of grant award. The grantee shall use no more than five percent of the total grant amount to complete the final work plan requirements.

### Concept Paper Requirements (2-5 pages for each project)

- A. Problem Description - Describe the relative seriousness of the existing or anticipated problem. Identify the geographic extent of the problem, any data or other technical information defining the problem, and any beneficial uses affected or threatened.
- B. Project Description - Describe the major planning objectives, work tasks (e.g., review existing data, draft alternative control plans, etc.), and outputs. This section must also show:
  - 1. Approximately when each output will be completed and, if appropriate, adopted; and
  - 2. Anticipated actions to adopt and implement the final plan.
- C. Project Cost - Show the anticipated project cost.
- D. Relationship to 5 Year Strategy - Show how the proposed project fits into the State's 5 Year Strategy.
- E. Elected Official Concurrence - For areawide projects, include a statement of concurrence from the appropriate elected officials in the objectives of the proposed project.
- F. State Concurrence - Projects submitted by State WQM agencies should be submitted by the agency director and be concurred in by the PAC. The State must provide a formal letter of concurrence for all proposals submitted from agencies other than the State WQM agencies. (This concurrence may be submitted after the concept paper, but EPA will not issue a WQM planning grant until the concurrence is received.)



## Final Workplan Requirements

A. The Problem - Describe the existing or potential water quality problem. In addition:

1. Identify the criteria and rationale used to select the project, and the project's priority status in the 5 Year Strategy and State/EPA Agreement;
2. Describe how the problem was addressed in previous planning efforts, and how the proposed project will make progress toward problem solution.
3. Identify the technical data used to define the problem and the geographic coverage of each problem, including beneficial uses presently or potentially affected. Is existing information adequate to identify the problem?

B. The Project - Provide the following information for each planning project:

1. Planning Objectives - The work plan must describe the specific objectives of the planning project. These objectives must focus on the water quality problems to be dealt with in the planning project and must reflect the priority of these problems. (The goals and objectives must be no less stringent than the 1983 water quality goals of PL 95-217).
2. Planning Tasks - The work plan must describe each task leading directly to achievement of the stated objectives, describe the level of detail for each task, and explain the accuracy and/or completeness required for each task. The work plan must also show the critical sequence of tasks and the inter-relationship between tasks.
3. Planning Budget - The work plan must show the required person-years and budget for each task. The budget information must identify Federal grant funds and local match.
4. Planning Outputs - The work plan must list and briefly describe all outputs (draft, interim, and final), including reports, technical memoranda, working papers, policy papers, ordinances, regulations and regulatory programs, formal agreements, etc.
5. Planning Schedule - The work plan must show costs and projected completion dates for each planning task and each output.
6. Implementation Actions - The work plan must show the specific actions needed to implement the final plan.

- C. Public Involvement - Describe the public involvement process, including:
1. A skeleton work plan tying major public participation activities and objectives to work tasks (i.e., sequence of distribution of information, workshops and meetings, hearings, etc.)
  2. A listing, by work tasks, of major publics that will be involved in the planning process.
  3. A budget, tied to work tasks, describing major categories of public involvement (i.e., publications and media campaigns, hearings, workshops, etc.)
  4. An indication that a Public Participation Summary will be prepared which describes measures brought before the public at key decision points, the public response, and the Agency's response as to how the plan was affected by significant input.
  5. A description of the membership, meeting schedule, and general responsibilities of any advisory committees.
  6. A brief description of how the public was involved in selecting this project and developing the work plan. (In some cases, the 5-year strategy development process could be referenced here to meet this requirement.)
- D. Implementing Agencies - List the expected implementing agencies for each major plan output.
- E. Agency Commitments - Provide documentation that each agency, with a significant responsibility for producing, adopting, and implementing the planning outputs, understands and is committed to their outputs and schedule, as described in the work plan. This documentation must be in the form of a written commitment from the highest appropriate elected official (policy) level.
- F. Other Involved Organizations - Identify all individuals, agencies, organizations, consultants, etc., other than the grantee and implementing agencies listed above, whose participation is necessary to carry out the work plan. Describe the specific responsibilities for each organization.
- G. Other Related Planning - Describe any other related planning in programs (e.g., 201, air quality, HUD 701, coastal zone management, etc.) and the procedures for coordinating these with the WQM planning project.
- H. Flow Chart - Submit a schedule and a chart (PERT, CPM, or other) which clearly shows the significant work tasks in sequence and the relationship between tasks.

- I. Assessment - Describe the environmental, economic, and social impact assessment process, as an integral part of the plan development process. Include a commitment to prepare and submit a summary environmental, economic, social impact assessment in the final plan.
- J. Quarterly Reports - Describe the contents and reporting schedule for the quarterly progress reports.

## Public Participation Work Plans

This paper outlines the basic requirements for a good public participation work plan for a 208 grant. The work plan requirements are derived from our regulations and established Regional policy. Regulations include the EPA Public Participation Regulations, 40 CFR Part 25, dated February 16, 1979, and the WQM Regulations, 40 CFR 35.1500-35, 1500-35.1550, dated May 23, 1979; policy guidance is available in John Underwood's February 21, 1979 memo entitled "Regional Policy on Work Plans for WQM Grants," and Bob Burd's October 19, 1979 letter to all state and local WQM agencies on public participation requirements. Copies of these documents are attached.

The fundamental objective of public participation is to enhance the probability of project success. We have observed a definite correlation between vigorous efforts to involve the affected public early on and regularly during the planning process and ultimate project success. Therefore, the various requirements listed below are meant to ensure that a wide range of interested and affected individuals and organizations are actively sought out and involved in all the important steps of the planning process, including assessing the problem, evaluating and selecting alternatives, and adopting the control measures.

The public participation requirements are not meant to be burdensome or meaningless bureaucratic hurdles. For individual projects, a certain amount of common sense should be used in applying the requirements listed below to the fundamental objective of the public participation effort.

### Work Plan Requirements

1. General: All 208 grants are required to have discrete public participation work plans (40 CFR 35.1507 and 40 CFR 25.11). These work plans are expected to include commitments to conduct all activities set forth in items 2 through 9 below.

A good public participation work plan should show what public participation activities (e.g., mailings, advisory committee meetings, press releases, workshops, etc.) will be conducted in support of the key interim and final outputs of the project. To do this, the grantee may use a timeline or flow chart showing the key outputs of the project and the public participation activities to be carried out for each output. This work plan summary or timeline can be an extremely valuable tool for both the grantee and the EPA reviewer. A good timeline linking public participation activities to project outputs indicates that the grantee has a good understanding of how to use public participation to facilitate project success.

2. Advisory Groups: All 208 grantees are required to have advisory groups (40 CFR 35.1507). Furthermore, the advisory groups must be generally consistent with the membership requirements in 40 CFR 25.7: 25% private citizens, 25% representatives of public interest groups, 25% public officials, and 25% citizens or representatives of organizations with an economic interest in the project. The grantee must also (a) provide a list of advisory committee membership to EPA for approval and make the list available to the public and (b) provide adequate staff support to the committee. (This staff support is grant eligible.)

In most cases, advisory group members will be representing their agencies or organizations. This representative status should be formally specified for each individual. Advisory group members with such responsibilities should make vigorous and conscientious efforts to maintain good information flow between their organization and the project staff.

3. **Public Information:** Grantees are expected to provide information to the public in the form of fact sheets, news releases, newsletters, etc., as appropriate, throughout the project. Such informational materials should be designed to encourage valuable public participation in all significant decisions (40 CFR 25.4).
  4. **Document Collections:** Grantees are expected to maintain central collections of adequate reports and other documents available for public review (40 CFR 25.4).
  5. **Mailing Lists:** Grantees are expected to maintain accurate lists of persons and organizations who have expressed or may have an interest in the project (40 CFR 25.4). The grantee should list the individuals and organizations to be specifically contacted for each major task requiring public participation.
  6. **Public Hearings and Meetings:** The public participation work plan may schedule public hearings and meetings as appropriate throughout the planning project. A hearing is required before completion of the final plan (40 CFR 35.1523-2). For public hearings, notification must be issued at least 45 days prior to the hearings, (40 CFR 23.5); notice for public meeting must be at least 30 days prior to the meeting (40 CFR 25.6). Additional procedural requirements regarding hearings and meetings are set out in 40 CFR 25.5 and 23.6.
  7. **Responsiveness Summaries:** Grantees are required to prepare and submit public responsiveness summaries at key points throughout the planning process (40 CFR 25.8). "Key points" means major decisions, completion or significant interim and final outputs, and any other actions requiring major public input. The timeline or work plan summary mentioned under item 1 above will also identify these key points.
- Public responsiveness summaries are intended to (a) briefly describe the public participation activities conducted in support of the project output or decision, (b) explain what significant public input was obtained, and (c) describe how the grantee responded to the public input (e.g., ignored, responded in writing, amended report, committed suicide, etc.). Additional detail on the content and procedures for public responsiveness summaries is available in 40 CFR 25.8.
8. **Budget:** The work plan must include a budget, tied to work tasks, describing major categories of public involvement (i.e., publications and media campaigns, hearings, workshops, etc.).
  9. **Public Participation in Work Plan Development:** The work plan should include a brief description of how the public was involved in selecting this project and developing the work plan. (In some cases, the 5-year strategy development process or the State/EPA Agreement process, could be referenced here to meet this requirement.)

Attachments

DATE: SEP 5 1979

SUBJECT: Guidance on Work Plans for WQM Grants

FROM: John L. Underwood, Chief  
Water Planning Branch, M/S 441

TO: State Planning Coordinators (see below)

RECEIVED  
SEP 6 1979  
EPA-WOO

The May 23, 1979 WQM regulations set forth several new requirements for water quality management planning. These new requirements are listed in Section 35.1521-3, Plan Development Requirements, paragraphs (a) through (h), as follows:

- (a) Control needs
- (b) Regulatory and other programs
- (c) Management agencies
- (d) Environmental, social, and economic impacts
- (e) Open space and recreational opportunities
- (f) Urban impacts
- (g) Coordination
- (h) Plan evaluation and revision

Many of these plan development requirements are not new, and are already embodied in our work plan guidance. However, items (e), (f), (g), and (h) include partially or entirely new requirements. You should ensure that all work plans approved after the date of this memo include these new plan development requirements. As a minimum, all work plans for grants awarded after May 23, 1979 must include these new items.

This guidance should be inserted in the WQM Operating Manual section IV, C, Work plans and Output Reporting.

## Addressees:

Janet Kowalski, AK Opns. Ofc.  
Steve Provant, ID Opns. Ofc.  
Cecil Ouellette, OR Opns. Ofc.  
Al Ewing, WA Opns. Ofc. ✓

cc: Elbert Moore, AK Geog. Spec.  
Deborah Yamamoto, OR Geog. Spec.  
Mike Gearheard, ID Geog. Spec.  
Bob Rulifson, WA Geog. Spec.