

**FY 2016-2017 OFFICE OF WATER RESPONSE TO COMMENTS SUMMARY**

<b>Comment from State, Tribe, or Other Stakeholder</b>	<b>Commenter(s)</b>	<b>Location in Draft Guidance</b>	<b>NPM Response</b>	<b>Action Taken in Final Guidance</b>
<p>ACWA appreciates the opportunity to review and provide feedback on the NPM Guidance. We also greatly appreciate EPA's efforts to improve and streamline the process, including implementing a two-year cycle. However the process is still cumbersome and difficult to navigate for effective review and feedback. In previous cycles, the Agency often merely acknowledged the comment and did not provide a substantive answer in the subsequent response document. Going forward, ACWA encourages EPA to provide more meaningful responses</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>General Comment</p>	<p>Thank you for your comment. The National Water Program appreciates this constructive feedback from our states partners.</p>	<p>No edits made.</p>

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to coregulator comments.				
ACWA questions the value for states in participating in the development of these national targets, or in meeting them, as doing so requires time and resources, however states do not directly benefit from the work (e.g., the targets do not serve as the basis for disbursement of grant funds.)	Association of Clean Water Administrators (ACWA)	General Comment	Thank you for your comment. The National Water Program appreciates this constructive feedback from our states partners.	No edits made.
ACWA is not providing comments on many of the regionally-specific portions of the NPM Guidance. ACWA encourages EPA to work directly with states in the affected regions for changes with impacts specific to their regions.	Association of Clean Water Administrators (ACWA)	General Comment	Thank you for your comment. The National Water Program appreciates this constructive feedback from our states partners.	No edits made.

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ACWA wishes to stress the need for continued investment of resources for the core Clean Water Act (CWA) programs. The success of the CWA programs relies on continued investment in the basic program elements of the CWA.	Association of Clean Water Administrators (ACWA)	General Comment	Thank you for your comment. The National Water Program appreciates this constructive feedback from our states partners.	No edits made.
As stated in the NPM Guidance, recent emergencies and large scale-contamination events have highlighted the need to raise awareness of risks to drinking water. Along these lines, ACWA was and continues to be closely involved in the development and promotion of a Toolkit entitled "Opportunities To Protect Drinking Water Sources And	Association of Clean Water Administrators (ACWA)	Section IIC, p. 14	ACWA has provided extensive and invaluable advice and assistance in drafting and editing the Toolkit, and in presenting the Toolkit to Regional Office and State constituencies. Each of the OW program offices (OST, OWOW, OWM & OGWDW) look forward to continue working with ACWA on the implementation of CWA and SWP integration to the benefit of all programs.	No edits made.

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<p>Advance Watershed Goals Through The Clean Water Act”, and is also working with EPA’s Source Water Collaborative to promote “A Call to Action: A Recommitment To Assessing And Protecting Sources Of Drinking Water.”</p>				
<p>With respect to integrated wastewater and stormwater planning, ACWA is generally supportive of this effort, but also recognizes it has resource implications. It would be helpful if EPA committed resources to assist a few of the interested states with developing an integrated permit that could serve as a model for other states.</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section II-C, p.14 &amp; Section III-C-1-a-iv, pp.50-51</p>	<p>EPA will look for opportunities to work with states on developing integrated permits.</p>	<p>No edits made.</p>

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<p>ACWA urges EPA to include in the final Office of Water NPM Guidance a clear reference to the E-Enterprise for the Environment initiative between states and the Agency. We ask the Office of Water to include language regarding how E-Enterprise concepts are being incorporated into the Office’s work, to explicitly recognize that states need flexibility to adjust their work commitments to incorporate E-Enterprise aligned activities, and to discuss that states may use categorical grant dollars to advance E-Enterprise projects. We also ask</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>General Comment</p>	<p>Thank you for your comments. EPA is committed to the efforts supporting E-enterprise for the Environment and increased flexibility with states. The Agency has included language on flexibility and added language on E-enterprise to address this concern.</p>	<p>Added text to the NPDES section that refers to E-Enterprise efforts.</p>

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<p>the Office of Water to provide examples in the final NPM Guidance of E-Enterprise aligned work it is undertaking.</p>				
<p>States generally agree that climate variability could have significant impacts on water resources. EPA however must recognize the difficulty for many states to engage in dialogue on the risks/concerns when framed in the context of a discussion on “Climate Change.” ACWA encourages EPA to engage in a dialogue with state water quality managers and staff to further discuss implementation of EPA climate initiatives in the water program.</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section III-A-3, p. 24</p>	<p>The Office of Water agrees with the importance of dialogue with ACWA on these matters.</p>	<p>No edits made.</p>

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<p>With respect to EPA’s goal to work with state governments to operationalize climate-related adjustments to water programs, including considering climate change impacts in triennial reviews of state water quality standards, ACWA does not believe that water quality standards programs should intentionally “operationalize” climate change any more than capturing effects of climate change (e.g., ocean acidification, drought or poverty) during implementation of those standards. In addition, altering water quality standards to account for climate change could make effects of</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section IIIA-3, p. 24</p>	<p>Thank you for this comment. EPA understands there could be potential confusion concerning the phrase "operationalize climate change" as it applies to water quality standards in the draft Guidance</p>	<p>EPA has clarified the identified text to avoid the concern raised by the commenter.</p>

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climate change more difficult to document and track.				
As EPA mentions, the 303(d) Program Vision reflects a successful EPA-state collaborative effort that first began in 2011. ACWA has facilitated numerous EPA-state discussions over the years in furtherance of the Vision and enjoys a strong working relationship with EPA in this arena. ACWA looks forward to continued discussion as states move forward with implementation of the six Vision goals. Overall, the treatment of	Association of Clean Water Administrators (ACWA)	Section III-C-1-a-iii, p. 46-47 & Appendix A, WQ-27, WQ-28	The EPA appreciates the continued collaboration with ACWA on the successful implementation of the CWA 303(d) Vision and Measures. As part of the Agency process, the CWA 303(d) program is required to provide a “national” target. Based on past TMDL development, the CWA 303(d) program identified 8% as an appropriate “national” target. As we move into FY 2016, these “national” targets will be adjusted and based on actual information provided by and discussed with states.	No edits made.
WQ-27 and WQ-28 in the NPM	Association of Clean Water		Thank you for your comment. Please see EPA’s response to the preceding comment	No edits made.



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<p>Guidance is consistent with the EPA-state dialogue on those measures. However, with respect to the national target for WQ-27, it is unclear how EPA arrived at the 8% figure for the national target. ACWA also encourages EPA to provide added clarity in the Final NPM Guidance on whether this means collectively 8% of <u>all priority waters</u>. ACWA also encourages EPA to engage with states early and often on the use of catchments in these and other performance measures.</p>	<p>Administrators (ACWA)</p>			

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<p>ACWA and states look forward to working with EPA on an alternative approach to using 2002 baselines to document progress on SP-10, SP-11 and SP12 for the FY18 EPA Strategic Plan.</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section IIIC-1-c, p. 54-55 &amp; Appendix A, SP-10, 11&amp; 12</p>	<p>The EPA will continue to coordinate with ACWA about proposed future changes to SP-10 and SP-11, and EPA plans to continue these discussions beginning in the fall of calendar year 2015.</p>	<p>No edits made.</p>
<p>ACWA encourages EPA-state dialogue on the distinction between SP-13 and WQ-29. SP-13 uses probabilistic monitoring results as a long-term budget measure, while WQ-29 is strictly an indicator measure from statistical surveys. This distinction should be made clear in the final NPM Guidance. ACWA also cautions that the SP-13 measure of “no statistically significant</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Appendix A, SP-13 &amp; WQ-29</p>	<p>OWOW: The EPA stresses the importance of using statistical surveys to generate statewide assessments and track broad-scale trends for state waters; enhancing and implementing designs to address water information needs at local scales (e.g., watersheds) including monitoring waters where restoration actions have been implemented; and integrating both statistical surveys and targeted monitoring to assess the condition of all water resources over time. The EPA developed a Statewide Statistical Survey Web Data Entry Tool to facilitate reporting of these results with the state Integrated Report (IR). Based on this reporting, the EPA has added an indicator measure to explore the use of state scale survey results to report on protection and maintenance of water quality. This indicator measure positions states to develop a baseline from which to track long term water quality changes across the population of waters within their state, with documented confidence.</p> <p>The EPA appreciates ACWA’s comment expressing concern</p>	<p>The EPA has made some additional edits to the guidance to distinguish the new indicator measure (WQ-29).</p>

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<p>increase in the percentage of waters rated ‘poor’” could have the unintended consequence of misrepresenting state progress in improving overall water quality. As states sample more waters through probabilistic surveys they will ultimately identify additional impairments. Thus it may translate under SP-13 as an increase in the percentage of waters with impairments, but may actually be an artifact of a sampling strategy.</p>			<p>about the interpretation of statistical surveys. It is likely that use of a randomized design may result in monitoring of previously unmonitored waters and those waters may be degraded or they may be healthy. The data collected at those sites may be used by states to identify a local impairment, according to the state assessment methodology, and those waters may be tracked using the Integrated Report format for tracking individual assessment units. For purposes of the survey analysis, whether national or state-scale, those sites are one of many that are combined to reflect conditions across the population of waters surveyed. While changes from one survey cycle to the next reflect a number of factors that the EPA attempts to examine in the analysis, over time statistically significant changes in the condition of the population of waters reflect “true” changes within the explicit margin of error reported with the survey results</p>	
<p>ACWA encourages further collaboration between, and crosspollination with, the EPA-state 303(d) Program Vision efforts and the Healthy Watersheds Initiative.</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section IIC-1-b, p. 53-54</p>	<p>OWOW: EPA appreciates this comment, and will continue to collaborate across these two efforts</p>	<p>No edits made.</p>

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<p>ACWA supports a new strategic planning initiative for the NPDES program. The program continues to grow while resources have remained static or even dwindled. EPA should strive to design regulations and permits that are readily implementable, which will result in increased compliance rates and improved environmental outcomes.</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section III-C-1-a-iv, p. 48</p>	<p>EPA will continue to work closely with states on the NPDES strategic planning effort to further outline goals and how they will be met. This effort aims to streamline the program wherever possible to obtain the best possible environmental outcomes with available resources. All goals established under this effort will be considered wherever possible for future NPDES program activities, including regulatory and permitting efforts.</p>	<p>No edits made.</p>

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<p>Close EPA-state collaboration is critical to the development of any new priority permit framework. The Office of Wastewater Management should consider reviewing Category 5 of the draft New Enforcement Framework for a mechanism that addresses state, regional, national, sector, or community prioritization. EPA should not consider the new measure as a Key Performance Indicator (KPI) until the Agency pilots the new measure for at least one year.</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section III-C-1-a-iv, p. 49</p>	<p>EPA will work closely with states and take into consideration other Agency efforts as a new priority permit measure is developed. EPA agrees that the measure should be piloted for at least one year prior to being considered a new KPI.</p>	<p>No edits made.</p>

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EPA should work with states to identify and mitigate all barriers/challenges associated with incorporating green infrastructure in state Clean Water Act programs.	Association of Clean Water Administrators (ACWA)	Section III-C-1-a-iv, p. 49; and Section II-C, p. 13 & 15	As part of its strategy to reduce stormwater pollution and support the broader use of green infrastructure, EPA is committed to working with our State partners to enhance the MS4 program. Opportunities exist as MS4 permits are reissued to include objective and quantifiable permit conditions that will improve water quality and increase the use of more sustainable stormwater control approaches, including green infrastructure.	No edits made.
EPA highlights the need to work with states on the long-standing issues related to overflows and bypasses, but makes no mention of the terms “mixing zone” or “blending.” EPA should address this oversight in the final NPM Guidance. Likewise, EPA should make “mixing zone” and “blending” issues a priority in FY16-17.	Association of Clean Water Administrators (ACWA)	Section III-C-1-a-iv, p. 50	EPA is currently developing a compendium of performance data for a spectrum of design and operational options associated with blending wet weather flows. EPA will work with States and other stakeholders to review and add to the compendium. EPA anticipates that the compendium will inform discussions to resolve longstanding issues related to blending.	Added language to reflect this continuing work.

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<p>States remain concerned that the Agency is pushing for more prescriptive NPDES MOAs than is necessary. EPA Headquarters should closely monitor individual state feedback on this issue.</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section III-C-1-a-iv, p. 51</p>	<p>EPA is not pushing for more prescriptive MOAs than is necessary. EPA’s review will identify elements of the MOA that do not meet the minimum regulatory requirements. In some instances, the MOA review will identify issues that can be addressed in either the MOA or in other program documents such as such as EPA/State agreements, grant workplans, or a supplemental Attorney General statement. EPA does not expect that all MOAs will be revised. EPA headquarters will be involved in individual state reviews and will monitor feedback.</p>	<p>Edited language to better reflect EPA’s intent.</p>

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<p>With regards to measures WQ-1a and WQ-1d, ACWA supports the addition of measurement WQ-1d, but remains concerned that EPA is only measuring numeric nutrient criteria (NNC) for TN and TP, and only for “all waters within the state.” ACWA encourages EPA to revise these measures to allow states to receive credit for <u>all</u> NNC efforts, e.g., if the criteria cover a subset of waters within a state, or if a state adopts chlorophyll-a (Chl-a) criteria. This more iterative approach is consistent with the March 2011 Stoner Framework, and one can model TN and TP reductions</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section IIC-1-a-i., p. 42-43; and Appendix A, WQ-01a &amp; WQ-01d; see also Section IID, p. 17</p>	<p>On EPA’s NNC website (<a href="http://cfpub.epa.gov/wqsits/nnc-development">http://cfpub.epa.gov/wqsits/nnc-development</a>), EPA acknowledges credit for all state NNC including TN and TP criteria covering only a portion of a watertype (e.g., wadeable streams) and response parameters such as Chl-a. In contrast, credit under WQ-01a,d is designed to encourage statewide adoption of criteria for TN and TP – the pollutants that cause nutrient pollution. Consequently, the measure excludes credit for response variables. However, under certain conditions the measures allow credit for numeric translators from narrative criteria to TN/TP values. To receive credit under WQ-01a, EPA would need to approve the submitted criteria. (See the FY15 measure definition at <a href="http://water.epa.gov/resource_performance/planning/FY-2015-NWPG-Measure-Definitions-Water-Quality.cfm#Measure_Code_WQ_01_a_b_c">http://water.epa.gov/resource_performance/planning/FY-2015-NWPG-Measure-Definitions-Water-Quality.cfm#Measure_Code_WQ_01_a_b_c</a>.)</p> <p>EPA’s March 2011 memorandum concerning a framework for nutrient reductions reaffirmed EPA's commitment to partnering with states and collaborating with stakeholders to make greater progress in accelerating the reduction of nitrogen and phosphorus loadings to our Nation's waters. EPA continues to encourage states to set priorities on a watershed or statewide basis, establish nutrient reduction targets, reduce point and nonpoint source nutrient loads, inform the public, provide accountability, and adopt numeric nutrient criteria (NNC). WQ-26 focused on identifying strong state and territorial progress toward achieving elements #1 (priority setting), #2 (reduction targets), and #8 (NNC). It was noted in the measure definition that EPA might modify the measure in</p>	<p>No edits made.</p>



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<p>needed to meet Chl-a criteria. Additionally, it is unclear how EPA will treat joint criteria based on TN/TP and a response variable, especially if an exceedance of a response variable is required before assessment of TN or TP is triggered. ACWA also requests that the Agency provide clarity on whether EPA approval of a state's NNC is required in order to receive credit for WQ-1a. Finally, ACWA urges EPA to consider establishing a measure targeted at reductions in nutrient loading/export, and to allow for more flexibility in addressing nutrient pollution, especially since NNC do not</p>			<p>future years to address other framework elements. Consequently, starting in 2016, EPA will eliminate WQ-26 and instead consider a new measure in the future regarding control of point sources of nutrient pollution, related to element #3 of the framework. As EPA continues to place a high priority on states adopting numeric WQS for total nitrogen and total phosphorus that apply to all waters, the component of WQ-26 that tracked NNC progress will now be tracked under the new measure WQ-1d.</p>	

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<p>necessarily equate to improved water quality, while nutrient reductions do.</p>				

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<p>When EPA issues a new or updated order (e.g., 5700.5A1) that could affect a current grantee, EPA should consider emailing the new or revised order to all EPA grantees.</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section IIIA-5, p. 26</p>	<p>Thank you for the comment. When EPA issues new or updated orders and policies (e.g., 5700.5A1, Policy for Competition of Assistance Agreements) EPA considers the most efficient and effective way to provide the information to current and future EPA recipients as appropriate. EPA’s Office of Grants and Debarment (OGD) posts information for current and potential recipients at <a href="http://www.epa.gov/ogd/">http://www.epa.gov/ogd/</a>, and the Agency encourages all current and potential recipients to visit the webpage for updated information. Specific information on the Competition Order and other related competition requirements are also available at <a href="http://www.epa.gov/ogd/competition/index.htm">http://www.epa.gov/ogd/competition/index.htm</a>.</p>	<p>No edits made.</p>
<p>Regarding GM-02, ACWA supports the promotion of environmental education and outreach to the residents of the Gulf of Mexico. However, this should not be solely focused on the value of reducing nutrient loadings in the Mississippi River. A holistic framework that includes the effects of wetland</p>	<p>Association of Clean Water Administrators (ACWA)</p>	<p>Section III-D-3, p. 65-66; and Appendix A, GM-02</p>	<p>EPA’s Gulf of Mexico’s Program Office environmental educational activities address numerous issues facing the gulf region. These issues include: enhancing and protecting habitat, strengthening community resilience, and improving water quality for all parameters, which incorporates the reduction of nutrient pollution. Due to limited space for performance measure description, the Gulf of Mexico Program was unable to fully explain its functions.</p>	<p>No edits made.</p>

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restoration and hydrological alterations, especially in the southern coastal states, is important.				
Regarding GM-03, ACWA encourages EPA to include in this measure restrictions on development in the coastal areas.	Association of Clean Water Administrators (ACWA)	Section III-D-3, p. 65-66; and Appendix A, GM-03	The EPA's Gulf of Mexico's Program Office (GMPO) is a non-regulatory geographic program, therefore, it cannot include restrictions on development in the coastal areas for measure GM-03.	No edits made.
<p>Improving the Integrity of the Nation's Drinking Water and Clean Water Quality</p> <p>Focus on Revised Total Coliform Rule (RTCR) and Proposing Revisions to the <b>Lead and Copper Rule (LCR)</b> (pgs. 10-11): We believe these are appropriate areas of focus. The RTCR will be a daunting new workload for states,</p>	Association of State Drinking Water Administrators (ASDWA)		EPA will continue to collaborate with the primacy agencies to assist in the effective implementation of the revised Total Coliform Rule.	No edits made.

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<p>especially at small and non-community water systems. As the narrative points out, many states have applied for extensions beyond the April 2016 implementation deadline; thus, coordination between EPA-HQ, EPA Regions, and states will be essential.</p>				
<p><b>Providing Safe and Sustainable Water Resources and Infrastructure -Protecting Drinking Water Supplies</b> (pgs. 12 &amp; 14-15): We appreciate the strong and clear statement about the criticality of ongoing collaborative and coordinated efforts to protect both ground and surface sources of drinking water -- as well as the</p>	<p>Association of State Drinking Water Administrators (ASDWA)</p>		<p>EPA looks forward to continuing our coordination with the State Clean Water Administrators and the State Drinking Water Administrators to support source water protection to achieve the objectives of both programs.</p>	

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<p>specific examples and references to key ongoing initiatives.</p> <p><b>-Focus on Maintaining Healthy Waters</b> (pgs. 12-13): We strongly support this ongoing initiative since many sources of drinking water are not impaired but are indeed threatened; their protection fits well within the goals of this initiative.</p> <p><b>-Improving Small System Capacity</b> (pg. 12 &amp; 15): The language related to improving small system capacity is appropriate and helpful; and the list of specific activities mentioned generally strike us as the right suite of actions that</p>			<p>Thank you for your comment expressing support for the ongoing Healthy Waters initiative.</p>	<p>No edits made.</p>

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<p>build upon our collective efforts to date. We offer the following additional comment:</p> <p>-Pg. 15, 3rd bullet, "Promoting EPA's Energy Use Assessment Tool": The tool was published in 2011 but could be made more user friendly, especially for water systems serving &lt;3300. It also includes Excel spreadsheet templates that may be out of date. We recommend a comprehensive re-look at the tool and training materials.</p> <p><b>-Supporting Sustainable Water Infrastructure</b> (pg.</p>			<p>Comment for General Public for Energy Assessment Tool: EPA continues to support building capacity for small systems, specifically in areas of water and energy efficiencies. We will consider these suggestions to enhance the tool and training materials as resources allow.</p> <p>Comment regarding cap dev activities and identify the leads - "EPA vs State" led: EPA agrees with this comment and will make the suggested recommendations.</p> <p>The Agency appreciates this comment. The Agency's implementation of its overarching sustainability goals has been, and will remain, focused on insuring that such goals promote utilization of the SRF's as a financing vehicle. OW</p>	<p>No edits made.</p> <p>Edited WIFIA text.</p>

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<p>13-14): We support the overarching sustainability goals set forth in this portion of the narrative. We would simply caution that these kinds of considerations need to be smoothly and efficiently folded into our collective infrastructure funding programs so that they don't unnecessarily delay projects and make SRF loans ultimately less attractive than other financing options. We also note, in the first paragraph on pg. 14, that the Agency commits to "implement" WIFIA. At this point, without funding for projects, it would seem more appropriate to characterize the</p>			<p>understands the potential for unintended consequences and remains committed to making the SRF's as efficient as possible.</p> <p>EPA does not plan to incorporate factors responding to the broad goals described that would delay projects or make the SRF less attractive to borrowers. Focus would be on the longevity of the infrastructure and promote infrastructure that would withstand major natural events and stay in service or come back into service rapidly.</p> <p>As regards WIFIA, we note that this National Program Guidance covers Federal Fiscal Years 2016 and 2017. EPA continues to develop the WIFIA program, consistent with the recognition that the WIFIA program's operation will be contingent on Congressional appropriations. The Agency's commitment to developing WIFIA aligns with the President's FY16 funding request.</p> <p>Furthermore, the USEPA's Clean Water and Drinking Water Infrastructure Sustainability Policy (October 2010) was developed with input from a variety of federal, state and local officials with the goal of promoting sustainable infrastructure within the water sector. Since then, EPA has encouraged the CW and DWSRFs to incorporate sustainability concepts into their programs and many states have done so. Many states have unique and effective policies that directly address sustainability issues whether it be through program requirements and incentives, project priority system</p>	



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<p>Agency's efforts as establishing the basis for a WIFIA program and implementing a program, should Congressional loan funds be made available. We would also suggest that this section indicate that the WIFIA program will be implemented in a manner that complements SRF programs.</p> <p><b>-Supporting Capacity Development</b> (pg. 15): The introductory sentence notes that "states will continue to work together with EPA and other partners on a variety of activities." This phrase gives the impression that the list</p>			<p>structure, innovative financial mechanisms, technical assistance, or outreach to communities and potential borrowers. While we appreciate the concern that such concepts could delay projects or make loans less attractive, we believe that states understand the value of sustainable and resilient infrastructure for the future.</p> <p>Thank you for your feedback, EPA concurs with the comment.</p>	<p>Edits will be made to the NWPG narrative.</p>

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<p>that follows is comprised of state-led or initiated activities. The list includes initiatives that are indeed state-led, while others are EPA-led, and several are collaborative. We'd thus suggest that the introductory phrase refer to a list of "state and EPA collaborative/cooperative activities."</p>				
<p><b>Controlling Nutrient Pollution</b></p> <p><b>Coordination with USDA-NRCS</b> (pg. 16): We believe the Water Quality Initiative is a golden opportunity for meaningful and ongoing coordination with NRCS and leveraging of conservation resources to control</p>	<p>Association of State Drinking Water Administrators (ASDWA)</p>		<p>Thank you for your comment expressing support for the ongoing National Water Quality initiative.</p>	<p>No edits made.</p>

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<p>nonpoint sources of pollution that threaten sources of drinking water. We appreciate the guidance's continued emphasis on this initiative</p>				
<p><b>Assuring High Quality and Accessible Information:</b></p> <p><b>-Drinking Water MAPS</b> (pg. 18): Under the discussion of the "Drinking Water Mapping Application for Protecting Source Waters" (DWMAPS), we suggest that the narrative include mention of the need to ensure that sensitive data is properly protected in DW MAPS, based on states' and utilities' concerns about sharing the data.</p>	<p>Association of State Drinking Water Administrators (ASDWA)</p>		<p>EPA greatly values the joint governance with states in the development of <b>SDWIS Prime</b> and <b>the Compliance Monitoring Data Portal</b> and will continue with joint governance through development and implementation. EPA agrees with and will make the suggested edits.</p>	<p>Edits made to narrative.</p> <p>"</p>



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<p>ensure that these efforts are fully successful and are “win-wins” for all parties.</p> <p><b>-E-Enterprise:</b> Finally, we suggest that the drinking water portion of the final NPM Guidance include a reference to the E-Enterprise for the Environment initiative between states and the Agency. For the Office of Ground Water and Drinking Water, E-Enterprise is manifested principally in the SDWIS Prime project. The joint governance and joint decision-making already underway in that project is reflective of E-Enterprise principles and should continue.</p>			<p>We appreciate your comment and will make edits based on suggested edits.</p>	<p>Edits made to update E-enterprise projects have been made in the NWPG</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>We suggest that the final NPM Guidance include language explaining how E-Enterprise concepts are being incorporated into the Office of Water’s drinking water data management activities, in recognition of states’ need for flexibility to adjust their work commitments to incorporate E-Enterprise-aligned activities, and to discuss how states may use categorical grant dollars to advance E-Enterprise projects.</p>				
<p><b>Cross-Cutting Themes - Climate Change</b></p> <p><b>-Climate Change Adaptation</b> (pg. 23; 1<sup>st</sup> and 2<sup>nd</sup> sub bullets at</p>	<p>Association of State Drinking Water Administrators (ASDWA)</p>		<p>EPA released internal general climate training in 2015 and will make related training available to external parties in 2015.</p>	<p>The Office of Water will strike reference to “2014”.</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>the bottom of the page): We appreciate that the first sub bullet says “work with states...”; however, our impression is that much of the outreach and work is taking place directly with utilities. We believe more can be done to help bring states up to speed on these trainings and tools. Under the second sub bullet, the reference to “...climate change developed in 2014-2015” is unclear to us. Please further explain what document or initiative is being referenced here.</p> <p><b>-Sanitary Surveys</b> (pg. 24): The last sub-bullet under the bullet that begins “EPA will</p>			<p>EPA agrees that sanitary surveys are an invaluable tool to assess the systems’ capacity to supply safe drinking water and that the intent of the survey, which is to evaluate the eight areas for compliance, must be maintained. EPA agrees with this comment and will consider this suggestion when working</p>	<p>The Office of Water will release an update climate change module for the Watershed Academy in 2015.</p> <p>No edits made.</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>work with state, tribal, and local governments..." refers to addressing climate change as part of a sanitary survey. We would offer a cautionary note on this point. While these on-site interactions can be very valuable opportunities to explore more than the minimum elements of a typical survey, there is a danger of these inspections becoming a "Christmas tree" on which other program priorities are hung. In so doing, the overall sanitary survey inspection may become more cumbersome and its original purpose diluted. It's important to ensure that any "extra" elements are</p>			<p>with primacy agencies to implement this concept.</p>	



Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>well defined, measurable, and manageable within the context of the sanitary survey.</p> <p><b>-SRF Program Measure</b> (pg. 25): The 2<sup>nd</sup> bullet from the top indicates that one of the SRF measures will include the “number of projects funded by SRF programs that implement recommendations of a climate preparedness and resilience plan adopted by a water utility.” We appreciate the challenge to communities posed by extreme weather and the potential of the SRF program to help better position communities to address these challenges. We simply caution that WQ-33</p>			<p>Thank you for the comment. We have revised the action to reflect the broader engagement that will occur across the water sector.</p> <p>WQ-33 was modified to: Number of CWSRF/DWSRFs that used financial incentives to promote climate resilience projects in the last year.</p> <p>WQ-34 was deleted. These changes were made to promote the public health protection mission while preserving a focus at the state level on the priority setting systems that provide consideration of climate preparedness and resilience of infrastructure as may appropriate to project selection.</p>	<p>Edits made to the NWPG narrative</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>and WQ-34 not create “mission creep” in the DWSRF program process by adding strings or directions to states that can detract from the public health protection mission of the fund.</p> <p><b>Cross-Cutting Themes - Implementing Innovative Technology in Water</b></p> <p><b>-Innovative Technology</b> (pg. 26): Under Innovative Technology Activities for FY 2016-2017, it’s unclear whether the workgroup referenced in the first bullet is strictly an EPA group or includes other parties. To be effective, it should include key</p>			<p>Thank you for the comment. We have revised the action to reflect the broader engagement that will occur across the water sector.</p>	<p>Edits made to the NWPG narrative to address this comment</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>stakeholders, including state representatives. In addition, this section should mention coordination with the new EPA-funded National Centers for Innovation in Small Drinking Water Systems.</p>				
<p><b>Water Safe to Drink</b></p> <p>Implement Core National Drinking Water Program Areas that are Critical to Providing Safe Drinking Water</p> <p>1. Development/Revision of Drinking Water Standards/Regulations</p> <p>-Pg. 29: We appreciate the guidance's mention, in</p>	<p>Association of State Drinking Water Administrators (ASDWA)</p>		<p>Thank you for your comment.</p> <p>We appreciate your comment, thank you.</p>	<p>No edits made.</p> <p>No edits made.</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>this section, of the state co-regulator role in rule development. We believe such consultation is critical to ensuring that drinking water rules are both implementable and achieve their public health protection goals.</p> <p>2. Implementation of Standards/Regulations and Technical Assistance</p> <p>-Pg. 30: At the bottom of the page, there is a section headed by the same blue wording on development of standards that was used on page 29, but this section is actually about rule implementation.</p>			<p>We appreciate your comment and will make edits accordingly.</p> <p>The text was reworded to better focus on non-compliance information being used to guide targeted funding and compliance assistance.</p>	<p>Edits have been made to NWPG to address this comment</p> <p>Edits have been made to NWPG to address this comment</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>3. DWSRF and Sustainable Water Infrastructure</p> <p>-Pg. 31: Under the bullet, “Coordinate with Enforcement”, states with primacy are asked to ....“work with their enforcement counterparts and with EPA....” States typically have implementation and enforcement staff in the same organization and they could even be the same people in the smaller states. We suggest rephrasing this text appropriately.</p> <p>-Pg. 32: The bulleted list indicates that ....“States are expected to...” [appropriately and responsibly implement their SRF</p>			<p>The text was reworded to address states applying for funds in the first year of appropriation to provide for timely use of the DWSRF funds.</p> <p>The text was reworded to address states applying for funds in the first year of appropriation to provide for timely use of the DWSRF funds.</p>	<p>Edits have been made to NWPG to address this comment</p> <p>Edits have been made to NWPG to address this comment</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>programs]. In this section, we would recommend a commensurate expectation that EPA should fund DWSRF state capitalization and PWSS grants in a timely manner, once Congress has appropriated these funds.</p> <p>4. Water System Security</p> <p>-Page 32: The last line encourages "...water and wastewater utilities to use the Cybersecurity Framework..." The statement, as written, is fine but we believe an introductory step is needed in managing this issue. Water systems need to first know what the</p>			<p>Water Security; Page 32: We agree with the comment and would note the existing efforts on cybersecurity specifically address this very point.</p>	<p>No edits made.</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>Framework is, how it works, and what it does before they're encouraged to use it.</p> <p>-Page 33 (Both bulleted lists): Only one of the items listed (3rd bullet in the second list) refers to state programs. We believe states, like water and wastewater utilities, need targeted training/support from the Agency so that all of these identified efforts will be successful.</p> <p>5. Source Water Protection (pg. 34)</p> <p>-We appreciate the narrative's emphasis on promoting integration of the CWA and SDWA; working in partnership with the</p>			<p>Page 33: We agree that states require training and would note that for all of OGWDW's training sessions, we invite state representatives to participate. Many of the training opportunities explicitly target state response capabilities. For more insight into this issue, ACWA might consider accepting EPA's standing invitation to engage in the collaborative process that serves to inform the states about water security work, such as the Water Security Partners meeting or the Water Government Coordinating Council.</p> <p>We appreciate your comment.</p>	<p>No edits made.</p> <p>No edits made.</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>Source Water Collaborative; and developing and disseminating DWMAPS. These are all timely and appropriate items to mention.</p> <p>-A particular aspect of CWA-SDWA collaboration we'd suggest highlighting concerns the Contaminant Candidate List (CCL) and the Agency's periodic determinations to regulate drinking water contaminants. When considering regulatory limits for such contaminants through the SDWA, there should first be consideration given to the extent to which such contaminants can</p>			<p>Thank you for your comment. The U.S. Environmental Protection Agency (EPA) has primary responsibility for ensuring the activities required by the Safe Drinking Water Act, and many other environmental laws, are carried out. EPA has begun activities to evaluate ways to integrate the SDWA and CWA programs. The Office of Water's National Water Program Guidance describes how the Environmental Protection Agency (EPA), states, territories, and tribal governments are working together to protect and improve the quality of the Nation's waters, including wetlands, and ensure safe drinking water, taking into consideration regulatory and non-regulatory approaches that encompass protecting source water from contamination.</p>	<p>No edits made</p>



Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>be addressed using controls available through CWA authorities, such as effluent limitation guidelines and NPDES permits. Thus, at the end of bullet 2 (pg. 34) for activities for 2016-2017, we'd suggest adding the following: "Determine whether contaminants with a positive regulatory determination under the SDWA need regulation through the Clean Water Act to address the root causes of high concentrations of the drinking water contaminant(s) of concern."</p> <p>-Overarching Comment – Source Water Protection: In addition to our</p>			<p>We appreciate your comment and take the suggested edits into consideration.</p>	

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>comments above, as an overarching comment, we appreciate that the guidance includes of variety of elements related to source water protection and specifically mention of collaboration/coordination with Clean Water Act efforts, such as designating public water supply uses and water quality standards, monitoring, and prioritizing the development of TMDLs for drinking water protection. We also appreciate the various cross-references and complimentary measures in the Clean Water Act programs portion of the guidance, such as the following:</p>				

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<p>-Section III, C, 1, a on “Implement(ing) Core Clean Water Programs to Protect All Waters Nationwide” that includes supporting drinking water protection and integration across programs... “as envisioned in the CWA-SDWA Collaboration Initiative.”</p> <p>-Appendix D – Additional Guidance for CWA Section 106 State, Interstate, and Tribal Grant Recipients – that indicates that “The Agency recommends that states and tribes continue to direct a portion of their CWA Section 106 funding for source water protection and</p>				

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
wellhead protection actions that protect both ground water and surface water used for drinking water.”				
<p>FY 2016 National Water Program Measures</p> <p>-Water Safe to Drink: We note that the all of the measures under subobjective 2.1.1 (Water Safe to Drink) are retained from the FY 15 NPM Guidance as are the FY 2016 planning target values, with two exceptions:</p> <p>-SDW-01a (% of CWSs with sanitary surveys completed in past three years): planning target reduced from 81% to 79%</p> <p>-SDW-05 (cumulative</p>	<p>Association of State Drinking Water Administrators (ASDWA)</p>		<p>Thank you for your comment.</p>	<p>No edits made.</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>number of DWSRF projects that have begun): planning target bumped from 8,900 to 9,000.</p> <p>We believe the “rollover” of the various budget and planning targets from the FY 15 Guidance is appropriate, as are the minor adjustments to the two measures above.</p>				
<p>-Improve Water Quality on a Watershed Basis: Finally, as noted in our comments above on the Guidance narrative, the discussion of climate change activities on pages 23-25 seem helpful and reasonable for promoting climate change tools, training, and collaboration.</p>	<p>Association of State Drinking Water Administrators (ASDWA)</p>		<p>WQ-34 measure was added in error and will be removed from the Guidance.</p>	<p>WQ-34 measure deleted.</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>However, the associated performance indicator measures WQ-33 and WQ-34 (pg. 86) may be of concern to some states, particularly for WQ-34 when having to quantify the number of climate related projects versus prioritizing projects that address immediate public health threats. We also suggest a wording change to (text cut off from original document)</p>				
<p>EPA must continue to train staff using its climate change adaptation module and should consider using this tool to also educate state and local water program staff about climate change</p>	NRDC	p. 23	Thank you for your comment. EPA agrees with your concern.	No edits made.

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
risks.				
We fully support the efforts of the CRWU initiative and urge EPA to continue to partner with states to spread awareness of the tools and resources available.	NRDC	p. 23	Thank you for your comment. EPA agrees with your concern.	No edits made.
Measure WQ-30 should be clarified as it is unclear if EPA intends merely to track the total number of WaterSense partners or a subset of partners, who are “working to improve water use efficiency.”	NRDC	p. 25, 86	<p>All WaterSense Partners are working to improve water use efficiency</p> <p>WaterSense, a partnership program by the U.S. Environmental Protection Agency, brings together a variety of stakeholders to:</p> <ul style="list-style-type: none"> <li>• Promote the value of water efficiency.</li> <li>• Provide consumers with easy ways to save water, as both a label for products and an information resource to help people use water more efficiently.</li> <li>• Encourage innovation in manufacturing.</li> <li>• Decrease water use and reduce strain on water resources and infrastructure.</li> </ul> <p>Because all WaterSense partners are working to improve water use efficiency, EPA will report the total number of WaterSense partners.</p>	<p>In the process of working to improve water use efficiency</p> <p>No edits made.</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
Measure WQ-32 should be more ambitious and not simply track the number of utilities that have registered to use CREAT. Instead, it should recognize that active engagement with CREAT requires actual use of the tool.	NRDC	p. 86	We agree that this information would be valuable, but EPA cannot track actual use of CREAT given the constraints under the Information Collection Rule.	No edits made.
Measure WQ-33 should remove any reference to a utility climate change resilience plan as most utilities do not have such a plan.	NRDC	p. 86	The measure has been modified to “Number of CWSRF/DWSRFs that used financial incentives to promote climate resilience projects in the last year”	Edits made to the NWPG narrative.
Measure WQ-34 should remove reference to a climate preparedness and resilience plan adopted by a water utility as most utilities likely have not adopted such a plan.	NRDC	p. 86	This measure was included in the draft guidance in error and will be deleted.	WQ-34 deleted from the Guidance.



Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
A new measure, WQ-35, should be added to track the number of water and wastewater utilities that have developed and adopted a climate change resilience plan.	NRDC	p. 86	EPA agrees that this information would be valuable, however EPA cannot track these data given the constraints under the Information Collection Rule.	No edits made.
The FY 16 Planning Target for measure SDW-21 should be revised. It is an insufficient metric for evaluating the success of training and technical assistance efforts related to emergency preparedness and resiliency. We recommend that it be revised to represent the percentage of population served by CWSs and POTWs that have received emergency preparedness and resiliency training and	NRDC	p. 77	EPA agrees that this information would be valuable, and will consider this suggestion against potential logistical and Information Collection Rule constraints.	No edits made.

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technical assistance.				
<p>In the January interpretive guidance for states and EPA Regions on implementing FWPCA amendments due to WRRDA, EPA failed to develop specific criteria and/or guidance for a cost and effectiveness analysis that meets the minimum statutory requirements. We urge EPA to work with state CWSRF programs and other stakeholders to ensure that projects receiving funding fully meet the new statutory requirements and thereby maximize the potential for water and energy savings.</p>	NRDC	p. 53	<p>On April 17th, EPA distributed a final cost and effectiveness appendix with supplemental information on the 602(b)(13) provision created by the Water Resources Reform and Development Act. The appendix is a follow-up to the final interpretive guidance issued on January 6, 2015. As the program gains more experience with this requirement, for example, through case studies and trainings, we anticipate sharing best practices with the 50 states and Puerto Rico.</p>	No edits made.

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>EPA should more consistently integrate climate change resiliency into FY 2016-2017 efforts to protect and restore large aquatic ecosystems. While climate change resiliency is discussed with respect to a few of these programs (e.g., Great Lakes), many of them barely mention it.</p>	<p>NRDC</p>	<p>p. 61-74</p>	<p>The Office of Water has identified working with Great Waterbodies on climate change as a priority (see p 24)</p>	<p>No edits made.</p>
<p><b>Summary:</b> On page 15, under “Capacity Development” the draft Guidance (7th bullet) states: “Identifying opportunities to coordinate with other funding</p>	<p>Idaho Department of Environmental Quality</p>	<p>Section II.C. page 15 under Capacity Development</p>	<p><b>Comment regarding NEPA:</b> EPA and USDA identified this as an issue a few years ago. In response, EPA began participating in an interagency workgroup of federal and state partners, including representatives from USDA, HUD, IHS and 13 states. In January 2013, the workgroup finalized an interagency memorandum providing a general outline of a Preliminary Engineering Report (“PER”), as well as a detailed template of each desired component. However, adopting the template for SRF purposes will be left to the</p>	<p>No edits made.</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>agencies (e.g., USDA Rural Development) to more effectively assist small systems.” An ongoing issue that Idaho DEQ’s SRF program has, when joint funding projects with the USDA’s Rural Development, is that of differing interpretations of NEPA (as embodied in our State Environmental Review Policy) versus the interpretations that USDA applies. This bullet item could go further to explicitly state that a NEPA integration is a goal.</p>			<p>states' discretion because preliminary engineering reports are not a federal requirement for SRF programs.</p>	

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<p>Describe the Problem: USDA's NEPA efforts in Idaho have been perceived as less rigorous than DEQ's efforts. In national conferences many states have stated just the opposite, while other states have expressed the same frustration that we have in Idaho. Regardless of what "side" of the problem a state falls on it is obvious that the two funding efforts oftentimes take conflicting approaches. Our funding recipients view both USDA and SRF funding as basically "federal" and different NEPA/SERP approaches smack of</p>			<p>EPA continues to work with USDA and other federal agencies to achieve better alignment and streamlining of environmental review processes to support states and water and wastewater systems improvements. No change in the text for national applicability.</p>	<p>No edits made</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>bureaucratic over-reach. Alternative Language: “An opportunity already identified is to align NEPA requirements between the two sources of funding.”</p>				
<p>ECOS appreciates that beginning with FY 2016-2017, U.S. EPA is implementing a two-year cycle for the NPM Guidances. ECOS supports this transition implemented collaboratively with state partners. In particular, ECOS supports the focus on 1) earlier and more meaningful state engagement in joint priority setting; 2) clear support to pursue flexibility within the NPM</p>	<p>ECOS</p>	<p>Draft Overview to the FY 20162017 National</p>	<p>Thank you for reviewing the draft guidance and providing comments. The National Water Program is committed to work collaboratively with states and tribes to achieve safe and clean water goals.</p>	<p>No edits made</p>

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
Guidance documents including identifying areas where flexibilities can be sought and providing additional guidance for seeking approval; 3) utilization of multi-year grant workplans to allow for better				
ECOS also recommends continued alignment and expansion of the issuance of NPM grant guidance on a two-year cycle to coincide with the 2-year NPM Guidances cycle			Thank you for your comment.	No edits made.

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>ECOS urges EPA to include in all final NPM Guidance documents clear reference to the E-Enterprise for the Environment joint governance initiative between states and EPA. Specifically, ECOS requests each NPM include language generally defining EEnterprise; language regarding how E-Enterprise concepts are being incorporated into each NPM’s work; language explicitly recognizing that states need flexibility to adjust their work commitments and required outputs to be able to devote time to continuous process improvement efforts,</p>	<p>ECOS</p>	<p>OAR, OW, OSWER, OECA, OCSPP, OEI, NEPPS Guidances</p>	<p>Thank you for reviewing the draft guidance and providing comments. The National Water Program is committed to work collaboratively with states and tribes to achieve safe and clean water goals.</p>	<p>E-enterprise language was added to the introduction and the information on the E-enterprise projects was highlighted and updated.</p>



Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>including joint efforts with other states, tribes and EPA in support of E-Enterprise aligned activities; and language discussing that states may use categorical grant dollars to advance E-Enterprise aligned projects. ECOS also asks each NPM to provide examples in its final Guidance of specific EEnterprise aligned work it is undertaking and examples of projects that states may similarly be undertaking. This may include efforts such as shared services development or implementation, LEAN and streamlining</p>				

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
initiatives, e-permitting, Enterprise scoping team participation, development of E-Enterprise architecture and identity management, portal development, and other activities.				
-Introduction, Section III, page 4: Needs to focus on the new vision.	Louisiana Department of Environmental Quality	Introduction, Section III Page 4	Thank you for your comment. This section of the NWPG focuses on the objectives and sub-objectives. The CWA 303(d) Vision is discussed later in the document under the Water Quality sub-objective.	No edits made.

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
-Appendix A-National Targets ,WQ-27: the	Louisiana Department of Environmental	Appendix A-National Targets	Thank you for your comment. In the draft computational guidance shared with states in February 2015, we provided suggested changes to the measures language. We will	No edits made.

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<p>sentence “Extent of priority areas identified by each state that are addressed by EPA-approved TMDLs or alternative restoration approaches for impaired waters that will achieve water quality standards.” can be interpreted to mean that the water quality standards will be achieved within a designated time frame. This sentence needs clarification. Perhaps it could be modified to say “Extent of priority areas identified by each state that are addressed by EPA-approved TMDLs or alternative restoration</p>	<p>I Quality</p>	<p>WG-27</p>	<p>incorporate this suggested edit in the response to comments received as part of that outreach and continue to work with states to improve the understanding of these measures.</p>	

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
approaches designed to achieve water quality standards for impaired waters.”				
-Additionally, both the budget and planning targets are set to 8%. Where did these values come from? How can a target be set if the states have not yet provided the information to EPA? On pages 4 and 5, the bullet for “National Program Activity Measures (PAMs)” does indicate that these targets may be a point of reference that will be updated the ing Spring/Summer of 2015.	Louisiana Department of Environmental Quality		As part of the Agency process, the CWA 303(d) program is required to provide a “national” target. Based on past TMDL development, the CWA 303(d) program identified 8% as an appropriate “national” target. As we move into FY 2016, these “national” targets will be adjusted and based on actual information provided by and discussed with states.	No edits made.