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1. Regulatory Framework (Chapter 2)

Impact: The plan expands on related regulatory programs without clearly referencing NPDES permits such as SGGP or ISGP

Result: May create confusion about whether new obligations apply to already permitted facilities

Policy: Add language confirming that the Nonpoint Plan supports and does not duplicate or override NPDES permit requirements

Economic: Reduces administrative burden and uncertainty for permit holders

Technical: Recognizes that existing permits already include nonpoint source pollution controls

2. Compliance Strategies (Chapter 3)

Impact: The plan highlights graduated compliance efforts but does not distinguish between regulated and unregulated sources

Result: Permitted operations may be unnecessarily included in field outreach or corrective follow-up

Policy: Clarify that compliance actions described in the plan are for non-permitted or voluntary participants unless permit noncompliance is identified

Economic: Ensures staff time is focused on unregulated areas, minimizing inefficiencies

Technical: Avoids duplicating regulatory oversight for sites already meeting established compliance standards

3. Financial Assistance (Chapter 5)

Impact: The plan prioritizes funding for agricultural and riparian projects, with little mention of industrial eligibility

Result: Industrial facilities implementing water quality improvements may be excluded from state or federal grant programs

Policy: Evaluate opportunities to expand funding eligibility to industrial operations installing qualified BMPs

Economic: Supports capital investment in water treatment and recycling systems

Technical: Many industrial practices (e.g., infiltration with pretreatment, process water recycling) directly reduce pollutant loading and should be considered eligible

4. Best Management Practices (Chapter 6)

Impact: BMP guidance updates may proceed without industry-specific input

Result: New BMPs could be incompatible with certain operations if not properly vetted

Policy: Include sector representatives in BMP development or revision processes

Economic: Helps ensure BMPs are practical and cost-effective for small and mid-sized operators

Technical: Ensures BMPs are field-tested, realistic, and technically sound for industrial applications

5. Monitoring and Remote Sensing (Chapter 7)

Impact: The plan discusses use of remote sensing and land disturbance tracking without confirming how data will be used

Result: Legitimate permitted activities like mining may be misidentified as non-compliant

Policy: Confirm that any remote-sensing data will be validated with on-site verification before compliance action is considered

Economic: Reduces unnecessary costs associated with inspections triggered by false positives

Technical: Recognizes that land disturbance is expected at permitted operations and must be evaluated in context

6. Groundwater Protections (Chapter 8)

Impact: Increased focus on nonpoint contributions to groundwater may raise questions about infiltration systems used by permitted facilities

Result: Sites may face additional scrutiny even if compliant with permit conditions

Policy: Clarify that infiltration of treated water under a valid permit is assumed protective unless data shows otherwise

Economic: Protects investments in existing water treatment infrastructure

Technical: Advanced infiltration systems using pretreatment meet groundwater protection standards and are widely accepted

7. Broader Implementation Factors

Impact: The plan incorporates climate, environmental justice, and tribal treaty rights into implementation goals

Result: Facilities may see new planning or permitting expectations tied to broader policy goals

Policy: Use impact screening to evaluate how new considerations affect various sectors

Economic: Helps prevent disproportionate impact on small or rural businesses

Technical: Sector involvement in planning can improve technical applicability of new initiatives

8. Permit Coordination and Communication

Impact: The plan lacks clear reference to SGGP, ISGP, or other applicable permits

Result: May lead to confusion about which requirements apply to which operations

Policy: Include a section or note confirming that facilities under NPDES permits are not subject to additional requirements under the Nonpoint Plan

Economic: Reinforces regulatory clarity and avoids duplicative communication

Technical: Supports alignment between established permit structures and new planning efforts