**General comments (**August 13 version):

Many statements (or aspects of Actions) in the August 13 version have no attribution, citations or references, except in some cases to Step 2 documents. Consequently, it is difficult to ascertain whether the information is factual, anecdotal or hearsay (including whether or not outdated).

For Actions, Participants were not held to a high standard to provide references or links to published literature or reports or definitions for terms, and it is reflected in the document.

These supporting information gaps appear to be most relevant to the state’s review of Draft Place‐Based Planning Guidelines (Plan Content (Step 5 Guidance, Pages 15-20), Review Category: “Validity of Information”)

**Environment, Natural Resources, and Economy of Oregon’s Mid-Coast:** Demographics information is insufficient. Population growth estimate (sheer numbers or percentage) is a valid metric to include but is fundamentally different than “demographics”. DEQ recommends completing this section to provide context for meeting Place-based Planning, Step 3 guidelines. An Oregon Health Authority reference was provided in comments for the MCWPP project Team’s consideration.

Additional specific comments or edits are provided in the text of the document we submitted.

**DEQ comments on Appendix B**: *Snapshot summary of the major basins in the Mid-Coast.*

1. For *Key Infrastructure Issues*: A number of these are anecdotal or un-sourced. Some are outdated, others may be simply incorrect or do not improve our understanding of “current” conditions, and may therefore be misleading or confusing.
2. There are several errors associated with locations in the Alsea and Yachts sections (see comments in document)
3. For subsection titled *Water quality limited streams that do not meet beneficial use criteria (ODEQ):*

* DEQ determined that these bulleted stream lists are based on Oregon’s 2012 Integrated Report and Assessment Database. That information was superceded by Oregon’s 2018/2020 Integrated Report and Assessment Database (effective November 2020). There are significant changes in both methodology and the Section 303d list that would be unnecessarily resource intensive to recreate for this Appendix.
* DEQ provided an updated summary for the section titled *Water Quality Impaired Streams in the Mid-Coast* (~ p. 26)
* DEQ’s interactive mapping application is both accessible and adequate for most end-users to explore impairments for specific areas or at multiple scales. Therefore, we recommend deleting all specific “impairments” (i.e., under *Water quality limited streams that do not meet beneficial use criteria (ODEQ))* in Appendix B. Instead, refer readers to the 2018/2020 Integrated Report webpage for most current information on water quality status:

<https://www.oregon.gov/deq/wq/Pages/epaApprovedIR.aspx>

RECOMMENDATIONS:

1. For *Key Infrastructure Issues*: Either provide current reference or omit anecdotal information
2. Omit information about status of wastewater treatment plants, overflows, etc. The information is not properly sourced and some of it appears outdated to DEQ.

* The Action Plan Imperatives are primarily focused on protecting and managing freshwater resources, not addressing wastewater treatment plant (WWTP) condition or upgrades. With one exception (City of Siletz), the WWTPs in the Planning Area discharge effluent to estuarine waters or the Pacific ocean and therefore have no direct impact on freshwater resources or potable water supply. Siletz discharges downstream of public water intakes.
* These WWTP facilities may be a source for water reuse, with appropriate technology, and that Action is addressed in Imperative 4. The anecdotal information does not advance assessing potential water reuse actions.