Oregon's Water Quality Standards Review Project
Rulemaking Workgroup

December 9, 2009 Meeting

Facilitator's Summary

The following notes are a summary of issues discussed and issues that may need further discussion at upcoming meetings.

Present for all or part of the meeting:
Workgroup Members: Nina Bell (NW Environmental Associates), Myron Burr (Siltronic), Michael Campbell (Industrial Dischargers), Rich Garber (AOI), Lauren Goldberg (Columbia Riverkeeper), Dave Kliewer (ACWA), Charles Logue (ACWA), Llewellen Mathews (Northwest Pulp and Paper) Peter Ruffier (League of Oregon Cities), Ryan Sudbury (CTUIR), Kathryn Van Natta (Northwest Pulp and Paper).

Other Representatives: Spencer Bohaboy (DEQ), Peggy Brown, Kim Cox (City of Portland), Kathleen Feehan (on phone, CTUIR), Janet Gillaspie (ACWA), Jannine Jennings (EPA), Andrea Matzke (DEQ), Melinda McCoy (EPA), Neil Mullane (DEQ), Steve Riley (ODA), Jennifer Shmickler (OFB), Christine Svetkovich (DEQ), Debra Sturdevant (DEQ), Jennifer Wigal (DEQ), Dave Wilkinson (on phone, ODA).
Also Present: Donna Silverberg and Erin Halton, DS Consulting Facilitation Team.

Welcome/Updates
Facilitator Donna Silverberg welcomed everyone to the meeting and conducted a round of introductions. Neil Mullane stated that although he has not been at every meeting, Jennifer Wigal and Deb Sturdevant have been briefing him throughout the process. He said that as to the schedule for this workgroup, there will likely need to be at least one additional meeting needed to talk about point source issues.

The following updates were shared with the Rulemaking Group:

- Because EPA's update to the IRIS values for arsenic has not yet taken place, DEQ announced that it will revert back to the 2.3 value for water + organism (the original preferred option).
  - DEQ will update WQS-related documents with this number.
- EPA announced a stakeholder meeting that will be held January 21, 2010 from 9am-1pm; it will include presentation and Question and Answer sessions with the Office of Pesticides and Office of Water on a project referred to as the pesticides "harmonization" project. The meeting will be held at the EPA Region 10 Offices in Seattle, WA.

Intake Credit Rule
Spencer Bohaboy provided the group with an update on the intake credit rule. He thanked Michael Campbell, Lauren Goldberg and Nina Bell for their assistance in

reviewing the previous draft, noting that their comments were reflected in the version distributed for this meeting and will also be reflected in the IMD guidance.

Bohaboy reported he had received a couple of questions about federal authority. *[note: since the meeting, EPA has provided the following clarification on this issue: the GLI Rule was intended to serve as guidance for EPA and the Great Lakes States and Tribes to use in evaluating the water quality programs of the States and Tribes to assure that they are protective of water quality. As such, the GLI Rule did not require Great Lakes State and Tribal water quality programs to be identical to the guidance established in the rule, but it did require the Great Lakes States and Tribes to adopt provisions consistent with (as protective as) the guidance laid out in the GLI Rule for waters in the Great Lakes System.]*

Also, Spencer noted that the guidance for these rules will be integrated into DEQ's RPA Internal Management Directive (IMD). He added that this draft of the rules include tighter legal language (for example page 5 subsection 1) to make it clearer for users.

As a next step, in order to facilitate the development of guidance to be incorporated into the RPA IMD, DEQ will try to gain a better working understanding of how some of the Great Lakes States have implemented their intake credit provisions.

Comments / Questions from RWG members:

- Comment: appreciate the effort that was put into this document and it is good to understand the background elements. For the facilities that use city water, perhaps there needs to be a broader allowance.
    - DEQ Response: Note that, for municipalities, the Intake WQBEL Rule provides for the concentration of the intake water pollutant to be determined at the point where the water enters the water supplier's distribution system (see section III(4) on page 6). The ultimate idea of intake credit provisions is to account for that pollutant that would be in a water body anyway.
- Comment: yes, facilities can't do anything about the pollutants that come in the door and we don't want to be penalized for using city water.
- Comment: this feels like a limited tool; can we see some analysis that would show how many facilities this would apply to? Think that it would be helpful for the EQC to understand that this tool appears to only help those facilities/municipalities that pull water from and discharge water back to the same waterbody.
    - Comment: this would be pretty hard to show, and the only clear application would be if a facility was putting back exactly where it drew from – more clarity on this topic might be reached when we get to the next agenda item.
- Question: where did DEQ end up on the groundwater issue? If facilities are pulling from groundwater and another source, are they considered the same waterbody?

  - DEQ response: yes, if the pollutants in the groundwater would otherwise reach the water body within a reasonable time. One would likely need a geo-technical study performed to help determine how the water body is affected by the groundwater.
- Question: was there any consideration or discussion re local limits or indirect dischargers within a municipality?
  - Answer: DEQ hasn't heard of any.
- Question: can DEQ clarify section III, paragraph 4? Would that be a <u>comparison</u> of post-treatment and the Columbia?
  - Answer: yes, the facility wouldn't get credit for what was already in the Columbia.

Jennifer Wigal, DEQ, reminded the group that this tool was discussed last spring, and at that time, DEQ and the RWG decided to keep this tool in the toolbox, even though the group acknowledged that its usefulness will be quite limited. She said that today's objective is to close the loop by letting the RWG see DEQ's proposed language and providing an opportunity for final tweaks.

- Comment: this tool might be an opportunity for an effluent stream to be treated separately.
- Question: could water bodies/watersheds be used synominously?
  - Answer: not really, and would suggest look at it in terms of practical application. The concept is mostly in terms of upstream/downstream; if a facility is directly on the Columbia, it is easy to evaluate the effects. The further away from that proximity, the harder it becomes to evaluate and the harder it would be to apply this rule. Watersheds deal more with tributaries. This tool is intended to work for a narrow spectrum of facilities.
- Comment: regarding potential legal ramifications, it seems like we need a sense of the enforcement ramifications when a facility is found not to have reasonable potential under this procedure.
  - DEQ Response: we do have that on the list of things to resolve, along with ESA consultation.
  - Michael Campbell Comment: the legal answer might be that as long as there's no permit condition (shield rule), then there is no limit and therefore any violation can be enforced.
- Comment: if there is a provision that states have to have limits for mixing zones, it seems that this would allow this to move through quickly.
  - DEQ Response: there remains the separate question of how consultation fits in.
  - EPA Response: EPA's current thinking is that the intake credit rules would not represent changes to WQS, but rather, NPDES implementation provisions, and as such would not require action under CWA §303(c). Therefore, it would not trigger ESA consultation requirements.
  - Michael Campbell Comment: if EPA does not consider this to be a WQS that it would take action on, this creates a real impossibility for sources.

DEQ noted that they spent a lot of time talking with EPA as this draft was developed and they heard clearly that this kind of intake provision is constrained (which is why DEQ branched off into other types of discussions). While DEQ likely cannot broaden the tool by much, they will refine it where they can based on input from Rulemaking Workgroup members and EPA. However, DEQ plans to shift their focus to developing or refining other implementation tools.

Background Pollutants

Jennifer Wigal, DEQ, reported that since the last meeting, DEQ had pulled together additional information on background pollutants. Michael Campbell commented that the biggest concern for folks he represents is that, for background pollutants, there are only two options: 1)-standards change to make allowances for background pollution, and 2)-variance provisions. Within each category, there are narrower and broader approaches. The narrow approach is for cooling, and/or not adding concentration and the broader approach essentially allows for a broader intake, whether it is human caused, natural or out of one's control.

Campbell walked through the provisions and clarified that the most recent document shared is an attempt to put it into context of absolute risk (i.e., if one can show beyond dilution that they're not increasing beyond 10 to the -4, then they're meeting criteria.) The idea is that they don't want to increase risk, and in most cases the source would benefit. Campbell reviewed the "proposed provision" doc and clarified that the language applies to human health criteria.

Comments / Questions from RWG members:

- Question: what about the non-human health criteria?
  - Michael Campbell Answer: acknowledge that we probably do need to address that, but we probably would not have trouble meeting the criteria unless dilution wouldn't help.
- DEQ Clarification: the first option would be a stand alone provision, and one that would support protecting use, as one could still meet criteria under the alternate risk provision. For the second option, the document attached to the Alternate Rule Variance (pg. 3 - "background concentration allowance" implementation provision), DEQ expects EPA would look at it like it is a multi-discharger variance and the justification would be met through one of the six criteria outlined in the EPA process, with a streamlined process for the permittees. The first option is meant to be a standard provision; DEQ would need to be able to demonstrate how it would protect the use, which is why it would be limited to carcinogens.
- Comment: as to whether this is a WQ standards revision vs. a variance, it would be helpful to see some level of EPA buy-in that once a source jumps through the variance hoops, then they are qualified. Also, it would be good to have a sense of the constraints that are put on this
  - Michael Campbell Response: regarding the "absolute approach" – at least for carcinogens – this is something that facilities are used to. And as to what situations these apply to, we think that there will be issues regarding storm

water/groundwater intake by municipalities. We need to make sure we're considering other options regarding intake water.

- DEQ Comment: we envision that approvals from EPA would be self-implementing, with no further approval needed. They would be administratively self-implementing, and would still allow for performance evaluation.
- Comment: seems like we're changing the FCR functionally – to 1.75 grams/day, based on using 10 x -4 versus 10 x -6, which would be less than the current level. Would state that it is uncertain whether the Tribes would be comfortable with that change.
  - Michael Campbell Response: do want to clarify that we're not suggesting changing the FCR across the board, only for intake circumstance. See this as a question of how significant it would be. Speaking for himself, he prefers to think of this as a small change - and he would prefer a variance change.
- Comment: while this has the potential to be a very small change, am also wary of the slippery slope and wonder if the <u>impact</u> would end up small.
  - Michael Campbell Response: acknowledge this concern, and would also say that it would be hard to go through this pollutant-by-pollutant. Think it is narrow in the sense that none of these would apply to anyone's process, but would apply for those with background pollutant issues. There are not a lot of solutions.
- Comment: this seems far more directed to industrial sources than municipalities. Credits will be very difficult to deal with for municipalities – and from a philosophical perspective, am skeptical that this will result in toxics reduction. ACWA believes we should look at other sources of toxics, such as air emissions.
  - Michael Campbell Comment: we're trying to get at the trivial concentrations; agree this doesn't help municipalitites; the point would be to get out of the trap of not dealing with the trivial sources.
- Comment: Concerned that variance process would be abused, and permit writers would act without EPA review and am perplexed as to what makes this a standards change (as opposed to permit implementation rule). Also, am uncomfortable with relative significance where concentration limit is higher than the criterion. Would rather that OR not talk about 10 -4 as acceptable (as limited to carcinogens) and would be more comfortable if the fallback were to explore the 10 -5 option to determine the limit for a source as it seems arbitrary to change the rules.
  - Michael Campbell Response: it is a standards change because we're talking about allowing concentration in the water body to be different than the criteria we have now (just like a mixing zone doesn't apply and needs to/has to be approved by EPA). Also, we would rather take a small change/relative approach to risk and are still interested in finding a solution for instances where there are small changes.
  - EPA Response: As we have talked through ideas, EPA has described the need for any background pollutant provision that is developed to protect designated uses. We have also talked about the relative vs. absolute risk approaches that are inherent in the processes used to derive human health criteria for carcinogens vs. non-carcinogens. EPA still has concerns with this version of the draft standards provision to address background pollutant. As it is

currently written, it reads more like an enforcement discretion or implementation provision as opposed to a standards provision. But we think that we can work together on getting the language exactly right.
    - DEQ Response: I think we're hearing that it is important for whatever provision is developed to be considered a standards change requiring EPA approval, as opposed to it being considered a permitting implementation procedure.
- Comment: regarding a dual criterion idea, one could be for discharge and one for source water – this seems more defensible.
    - EPA Response: that definitely ties more clearly into the approach we're talking about. For non-carcinogens, one would need to demonstrate why that level would be protective when the rest of the state is using 175 g/day.
- Question: is the DEQ version not a water quality standards change?
    - Answer: yes – EPA would have to approve it, just as they do for multi-variable dischargers. If a multiple discharger variance is adopted as rule by the EQC and approved by EPA, an individual discharger would go to DEQ for coverage at the time of permit renewal.
    - Michael Campbell Comment: this would meet needs of those that he represents, if it actually was approved by EPA as a variance – as long as it is administratively efficient.
- Comment: a variance needs EPA approval – so if it is a rule, how does it get approval?
    - EPA Answer: one of the important keys to facilitate EPA approval of a multiple discharger variance is for the State to show that at least one of the factors for granting a variance (at 40 CFR 131.10(g)) would be equally applicable to any of the dischargers applying for coverage under the multiple discharger variance provision. Development of implementation procedures to ensure consistent implementation of a multiple discharger variance provision could also facilitate EPA approval.

Following a working lunch with small group conversations, Campbell noted that perhaps there is more comfort amongst workgroup members with a relative provision; maybe as far as intake water, we're not too far apart regarding the substance and just need to work out the method (as far as the standards vs. the variances).

- Comment: for non-significant issues, feel this has been what we've talking about for two years and now we have a tool that can be refined and implemented.
    - CTUIR: agree.
    - ACWA: yes, as long as the diminimus issue is addressed somewhere.
    - Columbia Riverkeepers: yes, and given the variance white paper that we'll discuss later today, think that EPA/DEQ have heard enough from us today to be able to provide some helpful revisions.
    - Northwest Environmental Associates: concerned about setting this up as a variance. Concerned less about what this rule will do than establishing something that will negatively affect outcomes for the next triennial review. Feel like we need more input from EPA, and then perhaps a small subgroup could iron out the details.

- League of Oregon Cities: agree with what is stated above.
- Northwest Pulp and Paper: if we can hammer out this measure we will, by definition, meet the EQC directive of developing feasible implementation measures.

DEQ thanked the Rulemaking workgroup members for their feedback and stated that they do have a good opportunity to build on the substantive alignment they'd heard today. Moving forward, they will work with EPA, Michael, Nina, Ryan, Lauren, Kathryn and Rich – and anyone else who wants to be included to bring this topic to closure.

- Comment: object to the small group approach for this instance - think there needs to be sideboards that make it truly workable, as this particular item is of grave importance to NWPP and it is time-sensitive.
  - Response: the set of people who would help move this along might be smaller, but the topic would certainly come back to this group before considered final. Whoever wants to help with that can, but feel like we're running short on time.

Action/Next Steps: DEQ and EPA will brainstorm together on the revisions, and send the new version of the document out to the group for review. Discussion with this group can take place via a conference call or a meeting. DEQ pledged to come as close as possible to meeting everyone's needs in advance of that meeting, which will be scheduled for sometime around the 1st week of February.

Human Health Compliance Schedule

Spencer Bohaboy, DEQ, reviewed the proposed language, noting where DEQ had made edits and added elements of the most current implementation guidance from EPA.

Comments / Questions from RWG members:

- Question: under definition of compliance schedule, has the sentence "phased in technology based effluent limitations…" been modified?
  - Answer: as far as we know, this is the current language. We are not sure as to whether or not a comma needs to be added after the word 'limitations'.
- Question: what's the rational for adopting subsection 17?
  - Answer: to clarify, DEQ is working through litigation regarding subsection OAR 041-0061(16). There is a question of whether the actions taken to approve it by EPA were legal, and a question of whether DEQ needs to re-submit the current compliance schedule provision or whether it is enforceable as-is. The DEQ hope is that, when the proposal time for the rule comes, a compliance schedule provision specific to human health would not be needed and the current compliance schedule provision would be effective. However, we want to have a compliance schedule provision specific to human health in place in case that does not happen as hoped.

- Question: say a new facility cannot meet the new WQS; would compliance schedule be 5 years (the term of 1 permit)?
    - Answer: yes. *[Note: following the meeting, DEQ clarified this issue as follows: this is not necessarily the case. The compliance schedule can extend beyond the permit term, so long as the final effluent limitation is contained in the permit.]*
- Question: would DEQ give a final effluent limit that meets the WQS? A: if a facility cannot attain a limit based on WQS, that's where a variance would be more appropriate than a compliance schedule.
- Question: what if the pollutant is on the 303d list and they don't have any dilution?
    - EPA Response: the language in section 'f' means that a facility can't use a compliance schedule to buy time until a TMDL is completed.
- Question: – so a facility can't be sure how much credit they will be granted - what process would a facility follow?
    - DEQ Response: think we need to figure out what process will give you time to do the right thing and need to figure out what the right thing is. Likely, using a variance is the right tool, as it allows for time for processing. Compliance schedules, on the other hand, will enter a date certain for the end of pipe. It could be revised, depending on the TMDL, but for brand new technologies, compliance schedules may not work well.
- Question: if they don't know if performance will be consistent, what should facilities do? What happens where the facilities does everything outlined in the plan, but toxics are still present, would they be pushed to install expensive treatment?
    - DEQ Response: We would write the permit based on the performance objectives and establish interim milestones until the final effluent limit is to be achieved (including stating what the final limit will be). In that respect, a compliance schedule would work well.
- Comment: sometimes we have seen use of deferring renewing the permit as well. This could be a helpful adaptive approach, but agree that there is a gap in how we might deal with these issues.
- Question: what is the degree to which DEQ/EPA would create a compliance schedule extension?
    - EPA Response: there have been some examples of a compliance schedule being longer than a permit term.
    - DEQ comment: yes, there have been cases where the milestones extend beyond the permit term, and the next permit would just pick up where the other left off.
    - EPA comment: there does have to be a place where the final effluent limit is set.
- Question: am curious what Lauren Goldberg and Nina Bell's opinion is regarding what facilities should do if they are not sure they can get to the more stringent effluent limit in 5 years?
    - Nina Bell Response: as a general matter, compliance schedules are more desirable, as they hold facilities to specific actions within certain time and

thereby create assurance that they're doing what needs to get done. If I were a permit holder, I would lean toward using a variance. As certain aspects of the Clean Water Act are more strictly applied, I believe there have to be outlets; we have to come up with options that are reasonable, that maintain the integrity of the CWA, and also work for facilities. Even though we haven't done variances in OR, I feel we have to make them a viable option.
    - Lauren Goldberg Response: agree with what Nina stated above and would add that the reality is that there is a fear associated with variances because there's no end date, which is why we're paying so much attention to crafting the language around them now.
- Comment: from a facilities' perspective, we're not thrilled with variances either, as there has been of a stigma of them being a "skate by" tool.
    - Response: the fact that DEQ does defer permits occasionally creates an awareness that there is going to be the need for something else.
- Comment: I have concerns with incorporating the guidance found in the Hanlon memo into DEQ's rule for the human health compliance schedule.
    - DEQ suggestion: one thing that we can consider is to take the existing provision and not add anything to it.
    - EPA comment: Whether or not the guidance laid out in the Hanlon memo is incorporated directly into DEQ's compliance schedule rule, EPA will look to the Hanlon memo to guide its review of permits that incorporate a compliance schedule.
- Comment: in terms of the gaps that we need to fill with regards to facilities, remain unconvinced that they could be successful in meeting the criteria for a variance.

Action/Next Steps: DEQ will work on the document a bit more. As to whether DEQ can say more about how they would interpret compliance schedule language, Neil Mullane stated that DEQ could use the current language and make it specific to the human health criteria. Mullane said that while he was not sure if they would have the time to do a white paper for every decision, DEQ would like to see the package that goes to the EQC include something about how they got there.

- Comment: think the real issue is the need to point out that we should have a compliance schedule that is proportionate to the standards change.
- Comment: in the menu of things we have to look at, it seems like an awful lot of weight is on the variance. We assume we don't want to go to the EQC and have that seem like it is not enough to cover the gaps.

Variances White Paper

Andrea Matzke, DEQ, presented a revised paper on how DEQ would apply variances. She noted that they beefed up the scenarios and on the application itself, DEQ did use actual data. Matzke acknowledged the question of what's significant is still a big question and said that for today's meeting, DEQ hoped to focus this group on page 6.

Comments / Questions from RWG members:

- Question: is there a way to show justification for 5%?
    - Answer: from experience with EPA with Human Health criteria, there would need to be lots of discussion with toxicologists.
- Suggestion: in the 1st bullet on page 7, ACWA might rather see "shall" and flip the rebuttal presumption.
- Suggestion: on page 6, 2nd bullet, suggest use language DEQ is proposing in the actual rule - such as, "DEQ can authorize for up to 5 years, but it may be administratively extended."
- Suggestion: condition variance renewals such that they are contingent on the permittee fulfilling its responsibilities.
    - If incorporate variances into the permit, facilities can't extend it unless it's renewed.
    - EPA suggestion: could also set it up so the pressure is on the agencies to fulfill their responsibilities.
- Question: if there is an issue for 10 years, does a permittee just re-submit the original application to extend the timeline?
    - Suggest we say that when permit is reissued, the permittee is still obligated to make progress toward final effluent limit.
- Question: are variances independent of permits?
    - EPA Response: think in the case of the Great Lakes Multiple Discharger Variance, it was the state agency that proved renewal justification within the timeframe.
- Question: did EPA say offsets were not permissible?
    - EPA Response: through the variance process, we can do other things – so the level of the variance would establish the level of the WQBEL.
- Can facilities use offsets in a pre-TMDL situation? Answer: as long it was part of the variance process, yes.
- Question: what is EPA Region 10's thinking on the kind of economic analysis that would be required to be provided by a small facility?
    - EPA Answer: a factor 6 economic determination. Acknowledge that is not an easy hurdle to jump – especially for private facilities. Remember, this is one of 6 criteria factors – and you only need to prove 1.
    - Suggestion: make it clearer then, that DEQ/EPA only need proof of meeting one criterion under the six factors for a facility to qualify.
        - DEQ: will do.
- Comment: for facilities, it is not only the installation costs but the operational costs that would play into the feasibility analysis.
    - DEQ response: basically, there are two aspect of the economics; justification based on factor 6, and responsibility for the contribution. So DEQ would work to evaluate what more, if any, a facility can do – and what conditions therefore would be placed on granting the variance request. Acknowledge that that there will be a lot of variability.

Comments / Questions from RWG members - on the application:

- It would be a sin of omission to ignore the NPS findings in 131.10(h)(2) (same language as used in anti deg) - you have prohibition of permitting variances

where nonpoint sources could achieve the use and not a word about it in the issue paper.

- In sections ‘g’ and ‘h’: “not to include existing uses” – don’t see that in the paper so don’t know how DEQ plans to address that.
- Also, regarding the timeframe, the 3-year review language has not been included.
- Also, you’ve taken some elements out of the GLI but not all of the elements (especially regarding progress and risk)
- Have a big issue with variance proposal that would apply to all pollutants – what would that mean for an EPA review process?
- There’s nothing that describes obligations for what DEQ would do (replacement criteria) – again, this causes fear of what could be at the whim of a permit writer if there were no hearings requirement.
- The “if applicable” language is too vague and multiple dischargers section not well thought out – really vague.
- The word “natural” – it isn’t clear what that means.

Action/Next Steps: As time was running short for the meeting, DEQ requested that Rulemaking Workgroup members send additional comments in via email – specific comments can be redlined and thematic can be sent in generally. Comments requested by 12/18.

- Clarification: DEQ does plan to write an IMD. Also, DEQ will strive to be as clear in our intent for implementation as they can, but it is difficult to actually draft detailed implementation guidance until there is a final rule.

Timeline

Neil Mullane, DEQ, said that DEQ has been developing a reasonable timeline for the NPS subgroup. In February, DEQ plans to go to the EQC to give an update on the process and lay out the schedule for the rules, which will include NPDES and NPS issues. He said that, while DEQ had previously discussed April as the time for sending the draft package out for public review, the agency is now looking at August-October. He acknowledged that there have been a lot of years put into this effort already and that folks are anxious to get these standards out on the ground. Mullane said that there will be a need for more meetings beyond the one in February – perhaps in the later part of March / April 2010.

- Comment: appreciate the acknowledgement of the time that has already gone into this effort.
- Comment: An extended timeline is of significant concern to the Tribes as we have already extended the schedule once. We also have a set of needs that need to be met with regard to the health of our people. We would need to see a very concrete set of objectives and the framework to achieve those objectives to even consider an extension. We have discussed these issues for a year and a half and have moved the ball very little, so we would need to see goals and details about how additional time would be used effectively. Suggest that we be more intensive with the work performed in between meetings.

Implementation Tools Table
Neil Mullane, DEQ, said that this is one of the documents that will be highlighted for the EQC, so please make sure this highlights what it needs to for the groups people represent. The document will also be cross-checked with what FIIAC generated.

- Suggest: column added for expected uses.
- Suggest: add bifurcated approach

Action: As time was short for the meeting, the group decided to provide feedback via email to DEQ on what would be helpful to include in this snapshot style. DEQ will re-send Quantitation Limits document and add Michael Campbell's language.

Next Rulemaking Workgroup Meeting: DS Consulting will send out a doodle scheduling link to confirm the date for the next meeting in 2010.

These notes drafted and submitted by the third-party facilitation team from DS Consulting. For comments or changes, please contact Erin Halton at ehalton@cnnw.net or 503-248-4703.