



Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality

Headquarters
811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
FAX (503) 229-6124
TTY: 711

September 23, 2011

Bobby Cochran
Executive Director
Willamette Partnership
2550 SW Hillsboro Hwy
Hillsboro, OR 97123

Re: USDA Nutrient Tracking Tool

Dear Bobby:

Thank you for the significant work your organization has undertaken to adapt the USDA Nutrient Tracking Tool to Oregon and develop nutrient and sediment crediting protocol. As you are aware, DEQ is interested in nutrient and sediment trading to provide alternative compliance strategies for NPDES permittees, especially when these strategies reduce pollutants through ecologically-significant restoration actions that provide multiple environmental benefits. The Nutrient Tracking Tool and crediting protocol provide the means to quantify reductions in nutrient loads (nitrogen, phosphorous, and sediment) at the edge of a farm field or ranch resulting from conservation actions and give credit for these reductions within a TMDL or NPDES permitting context.

We appreciate your efforts to coordinate review of the Nutrient Tracking Tool by experts in the field and recognize that the tool will not be appropriate for all circumstances. It is our understanding that the tool is currently producing accurate, conservative reduction estimates for riparian forest restoration, installing fencing to manage livestock, use of cover crops, changing crop rotations, and employing conservation tillage. Estimates for other conservation actions (for example, nutrient management or wetland restoration) can also be made by the tool; however, the Willamette Partnership and expert reviewers believe further review is warranted and cannot recommend their use in a trading program at this time.

We look forward to incorporating the Nutrient Tracking Tool and applicable pieces of the nutrient and sediment crediting protocol into DEQ's water quality trading program.

Sincerely,

Dick Pedersen
Director

DP:m

cc: Neil Mullane, Water Quality Division, DEQ
Ranei Nomura, Western Region – Eugene Office, DEQ

