

Implementation Classification Schemes

Why?

- Allows prioritization of limited resources
- Helps address scientific uncertainty (i.e., the strength stressor-response relationships often varies under different environmental considerations)
- Provides a framework under which implantation procedures can be clearly described
- Allows phased implementation under different environmental considerations
- Maximizes flexibility with regard to developing appropriately protective nutrient reduction programs that best balance environmental needs with stakeholder concerns
- These classification schemes are of critical importance because they help convey how nutrient indicators (criteria) will be applied under varying circumstances

How?

Programmatic Designations

- Define classes based on existing regulations (i.e., antidegradation categorical protections)
- Define classes based on management processes (i.e., impaired/TMDL watersheds)

Empirical Categorization

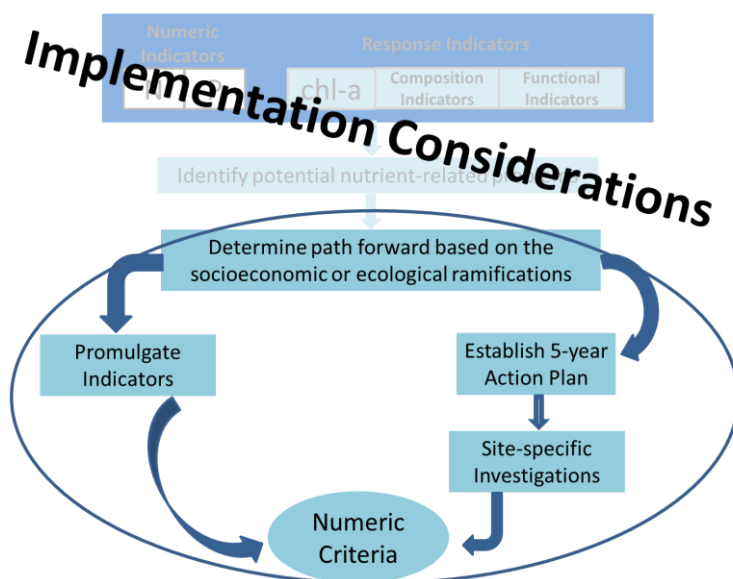
- Create classes to account for varying confidence in stressor-response relationships
 - Confidence in regional criteria often varies under different environmental conditions
- Define classes based upon the fact that the sensitivity of streams and lakes to excessive nutrient inputs varies under different environmental conditions
 - i.e., excessive benthic algae growth is more likely with stable substrate

Proposed and Existing Classification Schemes

These are very preliminary examples, which are intended to initiate discussion. We anticipate that implementation classification schemes will be extensively explored during future meetings.

Colorado

- Define different implementation procedures upstream and downstream of municipal discharges



Montana

- Develop site-specific criteria for large rivers, regional criteria elsewhere
- Different implementation procedures based upon economic impacts to communities

Wisconsin

- Clear implementation procedures for both point- and non-point sources; provides for financial support of any required non-point source remediation practices

Texas

- Define the need to develop permit limits for nutrients based on the relative sensitivity of receiving waters

Leland's Proposal (details to follow)

- Apply regional criteria immediately for most water that are designated with the most protective antidegradation protections or as drinking water sources
- Prioritize development of site-specific standards for other waters depending on the sensitivity to nutrient enrichment
- For urban waters assign a lower priority or longer timelines on the scientific complexities of defining appropriate site-specific criteria

Important Considerations

- These classifications and associated management responses could ultimately determine whether we move forward with nutrient reduction programs or with lengthy and costly litigations
- Flexibility is predicated on demonstration of continued progress in achieving nutrient reductions
- Appropriate implementation classification schemes and procedures must balance the needs of the environment with the concerns of stakeholders who may be affected by nutrient reduction programs
- Proposals must comply with State and Federal rules and regulations
 - In some cases rules (i.e., variance policies) will need to be developed to accommodate these approaches