

Potential Implementation Discussions

Water Quality Standards

Regional Numeric Indicators and Site-Specific Numeric Criteria

- Advantages and disadvantages of phased implementations
- Should headwaters (Category 1 Waters) be immediately prioritized for numeric criteria?
- What process should be used for prioritization of site-specific criteria efforts elsewhere?
- **Is it even possible to have a phased implementation given the GSL is in this state?**

Development of Site-Specific Standards

- Empirical Approaches
- Mechanistic Models
- Consideration of Multiple Lines of Evidence
- **All of the above**

Monitoring and Assessment

Identification of Nutrient-Related Impairments **(this assumes what, a standard is in place or the priority for one to be implemented?)**

- Rotating Basin and Tiered Monitoring Approaches
- Development and Implementation of Nutrient-Specific Assessment Approaches
- Bioconfirmation: Integration of Numeric Indicators with Biological Response Information
 - o Site-specific demonstration of deleterious nutrient effects

Potential Site-Specific Modifications to Response Thresholds

- Development of Site-Specific Standards
- Determination of “Best Attainable” Conditions **(will this address habitat and regime shift and include cost?)**
 - o Irreversible Conditions
 - o Recovery Potential
 - o Natural Confounding Factors (i.e., slope, channel shading, lake depth/residence time)

Protection of Downstream Resources

- “Near Field” and “Far Field” effects
- Moving upstream to Address Problems

Development and Implementation of Watershed Nutrient Reduction Strategies

A Collaborative Process Framework

- Assuring Continual and Iterative Progress *(does this include adaptive management processes or just tightening standards on point sources?)*
- Development of Collaborative Teams: Getting the Right People to the Table
- Combining Resources
 - Water quality trading *(there are very few of these programs that work and they are just shifting the responsibility to manage non-point discharges from the regulatory agency to point sources)*
- Statewide Prioritization Processes *(standard is in place then this is based on TMDL process if standard is exceeded)*
 - Incorporate with NPS funding schedule?
- Accounting for Watershed-Specific Situations
 - Relative Contribution of Different Sources
- Relative Ability to Address Problems *(is this related to economic ability or technical ability?)*
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- Accountability Concerns
- How to provide short- and mid-term regulatory certainty to partners?

Required and Optional Elements of Nutrient-Reduction Strategies

- Stormwater Plans
- Non-Point Source Reduction Strategy
- Numeric Criteria Implementation
- Adaptive Management Implementation Approaches
- Monitoring and Progress Reports

Addressing Non-Point Sources

- Challenges and Opportunities with Identifying Problem Areas
- Appropriate Funding Mechanisms
 - WI model: 80/20 or 90/20 cost share agreement for required reductions

- o How to fund this approach?

Addressing Point Sources: UPDES Considerations

Technology-Based Permit Limits

- o What limits are appropriate? (*GSL basin vs non-GSL basin issues*)
- o Where should the limits apply?
 - Size of facility/size of receiving water
 - Surrounding land use (*Does this mean urban vs rural or something else?*)
- o Assuring mid- and long-term regulatory certainty to affected facilities

Developing Nutrient-Related Permit Limits

- o Use of Qual2Kw and other approaches
 - Model parameterization process
- o How to address effluent dominated receiving waters?
- o (*waiver for wide spread economic harm*)
- o (*Procedure for mixing zones and economic limits of technology*)

Antidegradation Considerations

- o Establishing “least degrading” alternatives
- o Different Requirements for new facilities? Major upgrades? (*This still has an economic component*)

Economic Considerations

- o Variance Policies
- o Determination of “Extensive and Widespread” Economic Impacts
 - Economic planning tools