

Challenges and Approaches to Meeting Water Quality Standards Report Highlights

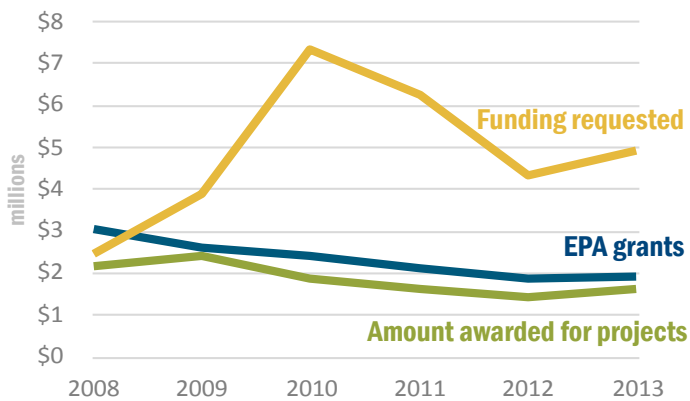
July 2014

States face many challenges while working to meet water quality requirements of the federal Clean Water Act. Two of the most significant challenges states face are determining appropriate water quality standards and finding cost effective methods for both point and nonpoint pollutant dischargers to meet those standards.

Point source dischargers are generally responsible for the cost of pollutant reductions required to meet permit limits. In contrast, nonpoint sources are not required to meet specific discharger limits.

Historically, states have used funds from EPA grants to encourage nonpoint sources to reduce pollutant runoff by adopting best management practices. However, EPA grant dollars have been declining and are not meeting demand. In 2013, approximately \$5 million was requested while only \$1.6 million was awarded.

Total funding requested for nonpoint source pollution improvement projects in Idaho is greater than the amount awarded.



To address such challenges, Idaho has considered two approaches: Use attainability analysis and water quality trading.

Use attainability analysis

Use attainability analysis (UAA) is states' principal tool for determining and revising uses of a water body. Despite Idaho's relative success with UAAs, stakeholders considering a new UAA can be

overwhelmed by the UAA process, high standard of evidence, and cost of conducting a UAA. Formal guidance from the Department of Environmental Quality (DEQ) would assist stakeholders as they approach and conduct UAAs.



We recommend the DEQ complete its UAA guidance document intended to help stakeholders navigate the process.

Idaho has had more UAAs approved by the EPA than all UAAs submitted by other states in EPA Region 10 combined.

UAA	Year
Blackbird Creek	1997
Bucktail Creek	2002
Lower Boise River tributaries	2002
Brownlee Reservoir	2003
Butcher Creek	2003

Water quality trading

Water quality trading is a market-based pollutant-reduction program. With only a few localized successes, trading programs have struggled to take hold. Despite the state's early involvement in developing trading frameworks, to date only one trade has occurred in Idaho. Idaho must meet at least three necessary preconditions for trading to occur:

- 1 Complete TMDLs where necessary
- 2 Establish trading frameworks
- 3 Incorporate trading language in NPDES permits

For more information, or to view the full report, go to:

www.legislature.idaho.gov/ope/

